

**WISE** Employment

# Modern Slavery Statement

FY 2024/2025

## MODERN SLAVERY STATEMENT 2024/2025

WISE Employment strives to do the right thing and to cause no harm. It is our role to ensure every participant of our programs, employer, social enterprise customer, learner, employee, supplier and funder is in some way better off because they engaged with WISE. Inherent in creating a positive impact, WISE Employment models a zero-tolerance approach to exploitative practices that violate an individual's human rights in all forms.

This Modern Slavery Statement (Statement) has been prepared according to the Modern Slavery Act 2018 (Cth) (the Act) for the reporting period 1 July 2024 – 30 June 2025 by WISE Employment Ltd (ABN 68 093 718 766). The statement encompasses all operations and entities, developed in consultation across key business units, supported by the WISE Executive team and endorsed by the WISE Employment Board.

Modern Slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom. The Global Estimates of Modern Slavery estimates that more than 50 million people are living in situations of modern slavery on any given day, of which approximately 27.6 million are in forced labour and 22 million in forced marriages. Women, children, and migrants – the most vulnerable – are disproportionately affected, with more than 12 million of all people in modern slavery being children, and women and girls accounting for over half (54 per cent)<sup>1</sup>. Acknowledging this stark situation drives WISE to commit to implementing all controls possible to ensure its supply chains and operations do not advertently or

inadvertently contribute to Modern Slavery practices, to take prompt and appropriate action if such issues arise, and to promote efforts against modern slavery amongst its suppliers and personnel.

WISE Employment is committed to implementing ongoing measures aligned with our strategic roadmap that will enshrine anti-modern slavery practices and ensure the actions that we take will continue to have a positive social impact and support the delivery of our mission. This statement describes the steps taken by WISE Employment to identify and respond to modern slavery risks during the financial year ending June 2025. WISE has focused on maintaining and strengthening governance structures to monitor supply chains and increase staff awareness around modern slavery and ensure we receive the same commitment from our suppliers, contractors and partners. To meet current and emerging modern slavery risks, WISE must continue to adapt its approach, adjusting existing and/or implementing new strategies and learnings to ensure it contributes to the elimination of modern slavery practices.

This statement has been approved by the WISE Employment Board on

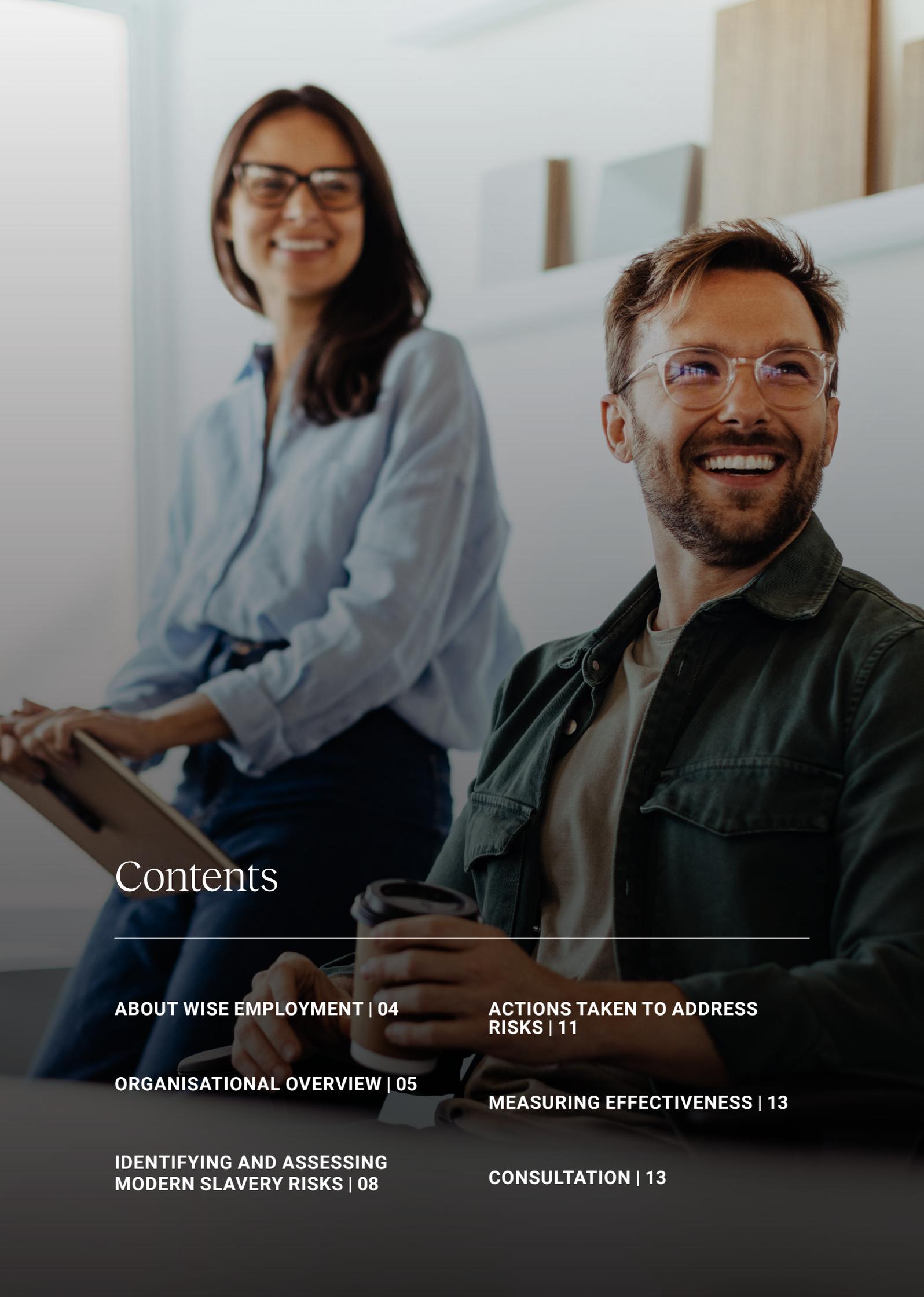
**Patsy Toop**

**CHAIR AND COMPANY DIRECTOR**



---

1. *Global Slavery Index*, <https://www.walkfree.org/global-slavery-index/findings/global-findings/>



# Contents

---

**ABOUT WISE EMPLOYMENT | 04**

**ACTIONS TAKEN TO ADDRESS  
RISKS | 11**

**ORGANISATIONAL OVERVIEW | 05**

**MEASURING EFFECTIVENESS | 13**

**IDENTIFYING AND ASSESSING  
MODERN SLAVERY RISKS | 08**

**CONSULTATION | 13**

# About Us

WISE Employment is an Australian not-for-profit employment services provider established in 1992 to assist people with disability and from disadvantage into employment. For 33 years, WISE Employment (WISE) has empowered job seekers to take control of their employment journey, helping over a quarter of a million people into meaningful work through our 205 offices nationally.

In 2024/25, over 70,000 people, especially those with disabilities and health conditions and the most marginalised, were assisted in employment pathways towards achieving sustainable employment, gaining critical skills for work through our delivery of national and local community-focused programs.

At WISE we believe that the power of employment provides far-reaching benefits beyond an income for the individual; it impacts their loved ones, households, friends, and the whole community.



## OUR VALUES

People                      Inclusion  
Innovation                Integrity  
Collaboration            Excellence

## OUR VISION

Enriching the Community:  
empowerment through employment.

## OUR MISSION

Our mission is to guide and inspire people to realise their potential and achieve fulfilling vocational goals.

## OUR ASPIRATIONS

Positively impact 1 million people

In 2025 WISE Employment achieved its promise to positively impact 1 million lives (since Jan 1, 2020).

*"Our Vision is a reality and there is more to come".*

# Organisational Overview

## STRUCTURE

WISE Employment was incorporated in October 1992 as Work Integration & Supported Employment (WISE) Inc. under the Associations Incorporations Act 1981. In 2001, it became known as WISE Employment Ltd, registered under the Corporations Law of Victoria as a public company limited by guarantee.

WISE Employment is a not-for-profit organisation whose purpose includes providing assistance to the disadvantaged (including long term unemployed, those with disabilities and other cohorts including persons in necessitous circumstances) to overcome barriers to securing and retaining employment and to provide training and other services relating to employment. Funding obtained by the organisation is primarily through government employment contracts and other grant sources.

WISE Employment Board of Directors provides stability in guiding WISE's continuous growth, bringing professional qualifications and expertise for providing good governance with Legal, Finance, Audit, Risk, Psycho Disability and Government Relations backgrounds. Three of the six volunteer non-executive directors have been on the Board for more than 20 years.

WISE Employment currently employs more than 1,700 staff, operating in more than 150 full-time and part-time sites across all States and Territories of Australia.

### **WISE Employment Ltd Entity** Details as of June 30, 2025

#### **Registered Office:**

Level 1, 552 Victoria St,  
North Melbourne,  
Victoria 3051, Australia

ABN: 68 093 718 766

ACN: 093 718 766

Registration Date:  
02/07/2001

#### **Type:**

Australian Public Company,  
Limited by Guarantee

#### **Charity Status:**

Not-for-Profit registered as  
a charity with the Australian  
Charities and Not-for-Profits  
Commission (ACNC)

#### **Other Trading Names:**

Clean Force Property  
Services; ELS (Equity Labour  
Services), PepperGreen  
Farm and PepperGreen Farm  
Catering

#### **Website**

[wiseemployment.com.au](http://wiseemployment.com.au)

# Operations 24/25



## Workforce Australia and Disability Employment Services

WISE delivers the Australian government's Disability Employment Services (DES), transitioning to the new Inclusive Employment Australia Program from November 2025 across all States and Territories of Australia.

WISE delivers Workforce Australia services in Victoria, New South Wales, South Australia, Western Australia, Queensland and the Northern Territory.

## WISE occupational rehabilitation

### Occupational Rehabilitation Services

WISE Occupational Rehabilitation Services, based in Melbourne, operates through all WISE locations. It provides services to job seekers as well as employees returning to work.

## Grad WISE

### GradWISE

GradWISE assists tertiary graduates with disability and was established in Melbourne. It is quickly expanding its partnerships with universities in other states of Australia.

## WISE Training Services #6653

### WISE Training Services

WISE is a National RTO (#6653)-trading as Interskills in South Australia and AST in Victoria), delivering accredited and non-accredited training, including vocational qualifications, foundation skills and customised pre-employment training and the Skills for Education and Employment (SEE) program in Bendigo, Victoria.

## PEPPERGREEN FARM

### Social Enterprises

WISE's award-winning Social Enterprises employ people with disability or from disadvantage who find it challenging to secure or maintain employment in the open labour market. Clean Force Property Services is based in Melbourne and Sydney and Equity Labour Services (ELS) operates from Ulverstone Tasmania. Peppergreen Farm is based in Bendigo, showcasing organic fresh produce, quality services and heritage listed tourism.

## NDIS at WISE

### NDIS Supports

NDIS@WISE offers supports from locations in Tasmania, Victoria, Queensland and South Australia. WISE is a registered NDIS provider specialising in assistance to access and maintain employment, specialist employment support, development of life-skills, community participation, social inclusion and therapeutic supports, as well as School Leaver Employment (SLE) Supports.

## WISE IDEA

### WISE IDEA

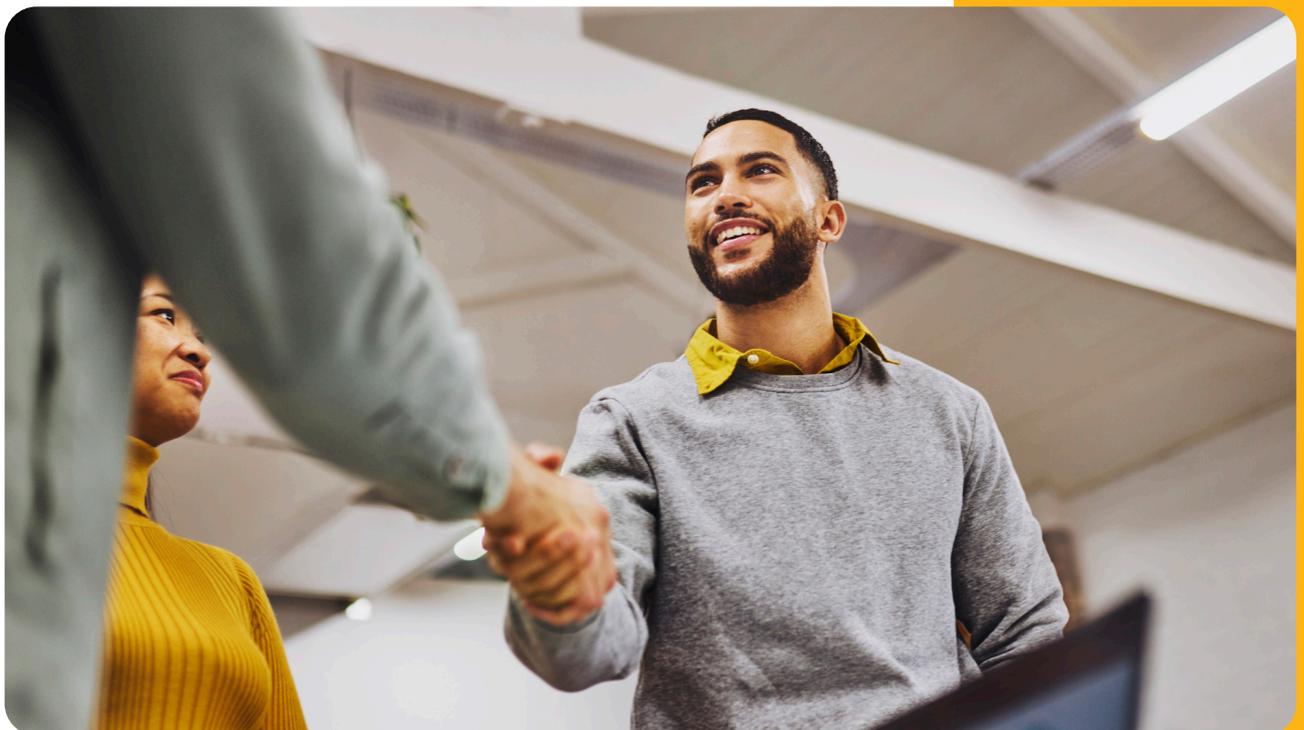
WISE IDEA (Innovation, Development, Evaluation, Application) is a centre of best practice in mental health and employment, an initiative of WISE Employment that aims to empower Australians living with mental health conditions through sustainable employment.

# Policy framework

WISE Employment takes a zero-tolerance approach to fraud and bribery, modern slavery, human trafficking and other unethical practices, including sexual harassment and sexual misconduct as well as child and vulnerable adult's protection issues.

Reinforcing its efforts to eliminate modern slavery risks from its operations, the following policies are in place:

- **Modern Slavery Policy** - Affirms our commitment and legal obligation to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations.
- **Due Diligence Policy and Toolkit** - Outlines WISE Employment's legal obligations in ensuring due diligence is considered in doing business with partners and suppliers and provides a toolkit to ensure due diligence policies are applied in practice.
- **Anti-Money Laundering and Terrorism Policy** - Defines and prohibits any involvement in Money Laundering and Terrorist Financing and sets out procedures to use where there is suspicion that any person/s or entity is involved in Money Laundering or Terrorist Financing.
- **Safeguarding and Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy** - Promotes the safety and welfare of people involved in the delivery of, or receipt of, humanitarian aid and development assistance and protects them from harm, including all forms of exploitation, abuse and harassment.

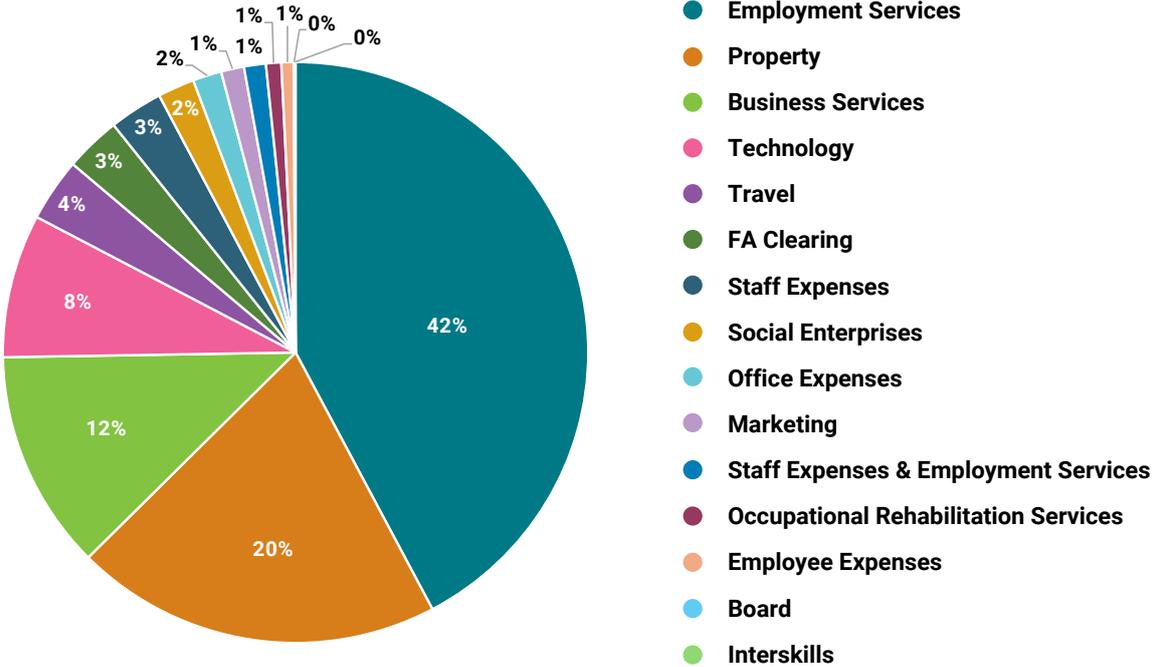


# Supply Chains

**WISE Employment continues to manage a very diverse supply chain.**

- In FY 24/25 WISE Employment managed approximately 1,628 suppliers with a total spend of almost \$64 million.
- The majority (99.01%) of suppliers were based in Australia.
- The majority of goods and services are purchased from domestic suppliers in metropolitan and regional areas.
- International suppliers (accounting for 0.98% of purchases) are predominantly for business services and business development, IT services and staff expenses.
- National suppliers (accounting for over 99% of purchases) are used for employment services, business and technology related expenses.
- Overseas suppliers did not exceed more than 1% of expenditure – the highest being recorded by South Africa (0.24%), UK (0.022%) and Korea (0.20%) for the categories of business services and travel expenses related to business development.

**TOTAL SPEND FY24/25**



# Identifying and Assessing Modern Slavery Risks

## GOVERNANCE

**WISE Employment Board of Directors** has ultimate responsibility for establishing a framework of risk management across the Organisation and any related entities. WISE Board adopts the TAGS™ specialized NFP governance system, with 10-year strategic plans, risk management framework, and 8 board meetings per year with financial and divisional reports reviewed against KPIs (financial, key risk areas, program performance, HR, stakeholder relations).

**WISE Employment Executive Team** comprising CEO (29 years WISE experience), Chief Financial Officer, Chief People Officer, CEO Asia and separate Chief Operating Officer's for WFA & Allied Services and Disability Employment Services is responsible for the day-to-day management and ensuring organisational, strategic and operational outcomes are achieved



# Current Identified Risks

WISE Employment continues an ongoing review process of its governance, supply chains and operations to identify and assess potential modern slavery risks. WISE has established an interdepartmental Modern Slavery Committee (MSC) to undertake the ongoing work of reviewing and developing strategies to address modern slavery risk. The following potential risks have been identified.

The following potential risks have been identified:

- High number of providers for one-off / short-term purchases.
- Multiple small suppliers with own supply chains and management of Modern Slavery risks
- Staff awareness of and their role in helping address Modern Slavery Issues
- Training staff in purchasing processes



# Actions Taken to Address Risks

## Due Diligence

WISE Employment has a legal obligation to ensure that its funds are used properly, lawfully and for their intended purposes. The WISE Due Diligence Policy and Toolkit is a comprehensive resource and guide that can be applied to risks of fraud and bribery, modern slavery, human trafficking and other unethical practices, including sexual harassment and sexual misconduct and child and vulnerable people's protection issues.

## Governance

- Regular Modern Slavery Committee (MSC) meetings
- Ongoing audit of WISE Policies related to Modern Slavery to identify gaps.
- Processes concerning Supplier procedures and due diligence are published on WISE's internal ProMapp system – a repository for all WISE processes and WISE Central (internal intranet) for policies that staff can access.
- The organisation has committed to providing additional staff resource to support the actions identified in this area

## WISE's Due Diligence Policy describes the process to:

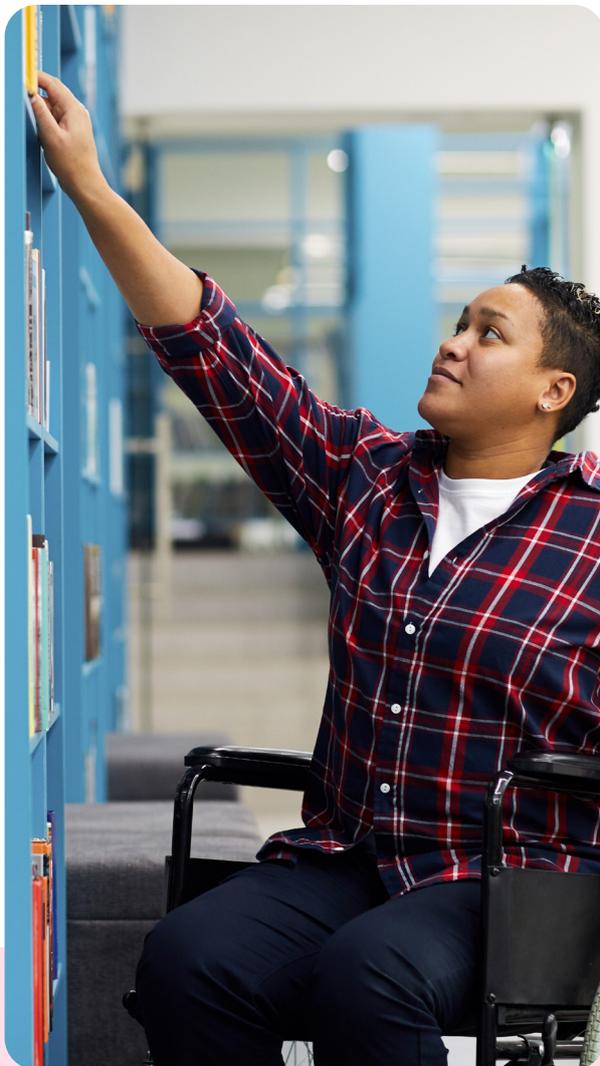
1. Undertake checks prior to entering into an agreement or arrangement with a supplier
2. Follow up on any concerns raised – including escalating to National Quality & Business Improvement Manager and the Chief Financial Officer for final determination.
3. Have suppliers to sign off against and comply with WISE Employment's Supplier Code of Conduct which outlines principles relating to anti-corruption, anti-money laundering, anti-terrorism, human rights and working conditions, and environmental responsibility

Where risks of breaching or violations by suppliers of these standards are identified, WISE will:

- a. Raise issues directly with suppliers with an offer to work with them to take appropriate corrective action.
- a. Where corrective actions do not resolve the risk, termination of any contract with the relevant party would be considered.

## Supply Chain

- Conducted annual program level analysis of suppliers focusing on type of product and service to identify potential products and services more at risk of modern slavery.
- Updated reconciliation process for purchases to provide greater clarity of what product or service has been purchased.
- Maintained improved screening processes for all new suppliers to the value above \$10,000 and incorporate modern slavery screening into the assessments.



## Future Actions - 25/26 Financial Year

- Undertake review of procurement processes to identify any Modern Slavery Risks.
- Modern slavery modules to be incorporated into WISE Learning and Development core training that staff need to complete on commencement and refreshed every three years.
- Undertake targeted in-depth analysis to identify modern slavery risks in specific areas of the supply chain.
- Further review supply chain and procurement processes.
- Continue raising the education and awareness of our staff to modern slavery issues and the application of due diligence processes across the organisation.
- Develop key performance indicators to help guide and measure the effectiveness of actions.

An annual audit undertaken by the WISE National Quality Manager of the processes implemented based on a high-risk and high-value framework, including reviewing the effectiveness of the processes put in place, of the accuracy of supplier checks, record keeping, compliance against any new procedures (e.g., purchasing delegations and processes) and checking the effectiveness of risk assessment processes.

# Measuring Effectiveness

WISE takes an ongoing approach to assess the effectiveness of its actions addressing Modern Slavery through:

- Regular and ongoing review of its modern slavery approach in alignment with regulatory/legislative changes and best practice.
- Reporting against key KPIs including: suppliers that have been reviewed, number and outcomes of actions taken of supplier risks identified, complaints or whistle-blower alerts received, enquiries received by the Finance team of operational staff seeking guidance on issues concerning modern slavery in procurement, numbers of open and closed findings where risks were identified.
- All new providers screened using new screening methods.
- The number/percentage of staff that have completed subsequent training implement on modern slavery.

The Modern Slavery Risk Committee meeting regularly to review all processes and report on progress.



# Consultation

In preparing this Statement, WISE Employment undertook a formal consultation process with its controlled entities and business units. This process included:

- Engaging with the management teams of WISE's controlled entities, including Clean Force Property Services, Equity Labour Services, Peppergreen Farm, and Interskills, to ensure consistent application of policies and alignment with WISE's governance framework.
- Circulating draft versions of the Statement to the leadership of these entities for review, feedback and confirmation of accuracy regarding their operations and supply chains.
- Conducting cross-entity workshops and meetings, led by the Modern Slavery Committee (MSC), to identify risks, harmonise due diligence processes, and share best practices.
- Ongoing collaboration with executive leadership and governance committees to ensure modern slavery risks are managed consistently across all entities that WISE owns or controls.

This consultation ensured that all relevant entities contributed to the preparation of the Statement and that modern slavery risks and actions have been considered across the entirety of WISE Employment's structure and operations.

# **WISE** Employment

MODERN SLAVERY STATEMENT 24/25