

# INTOWORK AUSTRALIA MODERN SLAVERY STATEMENT

## 1. Background

IntoWork Australia Limited and its Controlled Entities (IntoWork Australia) is a Group of companies operating under the IntoWork Australia banner.

This modern slavery statement is presented by IntoWork Australia and the following fully controlled subsidiaries of IntoWork Australia:

- IntoWork Australia Ltd coordinates the IntoWork Group as appropriate and primarily provided corporate shared services to Group businesses. It has a trading arm, IntoJobs delivering Workforce Australia employment services to Australians looking to enter or re-enter the workforce.
- Apprenticeships Group Australia Ltd is a Group Training Organisation (GTO) and Registered Training Organisation (RTO). AGA also delivers Transition to Work services for young people.
- Hume Employment Service Ltd (Kestrel Recruitment) is a Group Training Organisation (GTO) operating in North East Victoria and Southern New South Wales.
- Interact Australia Ltd is a Disability Employment Service provider, a provider of Inclusive Employment Australia services, a registered service provider for the National Disability Insurance Scheme and a provider of Injury Support Services.
- Help Enterprises is an Inclusive Employment Australia provider, a provider of Disability Community Services, social enterprises and a registered service provider for the National Disability Insurance Scheme.
- MAS National Ltd is an Apprenticeship Network Provider, servicing South Australia, New South Wales, ACT, Queensland and Tasmania. MAS National is a subcontractor to IntoJobs for Workforce Australia contracts, holds a number of government contracts and also provides Worksafe Consulting services.
- Institute of Training and Further Education Pty Ltd is a national quality RTO delivering short courses, online courses and certificate and diploma-level qualifications to business customers and individuals.
- Work & Training Ltd is a GTO, RTO and recruitment service provider throughout Tasmania, and holds a number of government contracts.
- Learning Partners is an RTO operating in Tasmania focusing primarily on traditional trades training.
- MRAEL Ltd operates in Queensland as a GTO, RTO, a Senior Vocational College and partners with MAS National to deliver Apprenticeship Network Provider services in Queensland. It is also a subcontractor to IntoJobs for Workforce Australia.
- Capricornia Training Company Ltd is a service provider of the Youth Housing and Reintegration Services program which has recently been novated to MRAEL Ltd.
- Toowoomba Regional Apprenticeship Company Pty Ltd operates in Queensland as a GTO and RTO providing training and workplace apprenticeship placement.
- Hospitality Training Network Ltd is a Group Training Organisation (GTO) focused on Hospitality and Tourism industries operating in New South Wales and the Australian Capital Territory.
- Skill Hire WA Pty Ltd is a GTO, RTO, labour hire and Transition to Work service provider predominately in Western Australia.
- Nara Training and Assessing Pty Ltd is an RTO providing high-risk short course training servicing Western Australia.
- Plumbing and Painting Training Company is a GTO and RTO operating in Perth, focused around plumbing and painting.
- The GO2 People Australia Pty Ltd is a labour hire company primarily operating in Queensland.
- GO2 Recruitment Pty Ltd is a labour hire company operating in Queensland and Western Australia.
- Plus Recruitment Pty Ltd is the parent entity of the following entities:

- Hunter Executive Search Consultants Pty Ltd is a white collar recruitment company specialising in executive search, and board appointments operating across Australia.
- FindStaff Pty Ltd is a leading recruitment agency in printing, mining, manufacturing, logistics, administration and civil sectors.
- Stockdale Personnel Pty Ltd is a leading print industry recruitment and labour hire company with offices in Melbourne and Sydney.
- IntoWork New Zealand Ltd is the parent entity of the following entity:
  - Apprenticeship Training Trust is a Group Training Organisation (GTO) operating across New Zealand supporting Plumbing, Drainlaying, Gasfitting and Electrical apprentices.

IntoWork Australia had revenues during the 2025 financial year of \$378m and employees of circa 2,400.

## 2. Our Supply Chain

As a provider of employment, skills and education, and support services, we consider our supply chain to be relatively simple in comparison to many other industries. We work with a range of suppliers who provide goods and services across a number of different categories, such as IT and telecommunications, marketing, legal, property, facility management and other services.

Our supplier spend is significantly weighted towards services in which we purchase intangible services from locally sourced suppliers and as a result we have close relationships with our suppliers. Recently we conducted analysis on our spend categories listed in the table below which highlights the relative share of the spend category.

### Spend category insights

Spend Category	% share
Advertising & Marketing	3.2%
Consumables	3.0%
Energy	0.8%
Fleet & Vehicle Leasing	7.9%
Human Resources	1.7%
ICT	15.2%
Insurance	9.7%
Miscellaneous	19.4%
Professional Services	6.8%
Property	13.1%
Training	10.5%
Travel	8.8%

Understanding our key spend categories helps us understand our supply chain. In the table above the spend categories describe the services we purchase and when further extrapolated the common and inherent features within the supply chain industries can be identified. For example, Energy is a category where we source electricity and gas from our local suppliers within Australia. However, fleet and vehicle leasing contains a component of overseas vehicles and manufacturers in addition to local suppliers.

These spend categories are closely aligned with industry sectors and supply chains which have unique features, behaviours and geographies. Where intangible services are provided through the transfer of skills, knowledge and intellectual property

from local sources we believe that there is a relatively low risk of labour exploitation or other forms of slavery and human trafficking occurring within it and this constitutes a lower risk to Intowork. As the table illustrates above a significant share of our spend portfolio is on services predominantly provided by local suppliers. However, there are categories in which services provided by specific industries such as cleaning are exposed to higher risk of labour exploitation and slavery due to a vulnerable workforce.

Whilst a significant portion of our portfolio may have an inherent lower risk, we still recognise the importance of high risk industries and IntoWork is committed to preventing any form of labour exploitation or other forms of slavery and human trafficking within our business and our supply chain which is demonstrated by our practises.

### **3. Policy on Modern Slavery**

IntoWork Australia opposes all forms of slavery and forced labour and is committed to procurement practices that eradicate it from our current and future suppliers.

During the 2025 financial year, IntoWork Australia has continued to follow the Procurement Policy that governs how we manage the risks associated with procurement and ensure that procurement processes are transparent.

IntoWork Australia and its Group of businesses are committed to:

- identifying and taking actions to address modern slavery risks, and increasing transparency within our supply chains and business operations,
- providing information and instruction on human rights and ethical sourcing to staff involved in procurement and our suppliers,
- assessing the adequacy and effectiveness of actions taken by both our supply chains and business operations to manage the risk of modern slavery, and
- reporting of actions to assess and address modern slavery risks in our operations and supply chains as required under the Commonwealth Modern Slavery legislation.

Our approach to the risk of modern slavery is maintained and managed within the IntoWork Risk Register.

### **4. Due Diligence Processes for Modern Slavery**

IntoWork Australia prohibits the use of all forms of forced labour and any form of human trafficking. We have several procedures in place in relation to our suppliers and employees to proactively manage any risk, including:

- Robust recruitment processes in line with Australian employment laws and encouraging employees to report any concerns.
- Maintaining close relationships with our existing suppliers and ensuring that suppliers agree to the IntoWork Australia policy on Modern Slavery through our supplier onboarding processes.
- All IntoWork and related entity employees have access to channels through which they may voice concerns, either through line managers, field officers, senior management, or human resources. IntoWork Australia is committed to protecting employees when disclosing malpractice and will ensure that all disclosures made will be treated without fear of retaliation. It is by receiving and evaluating feedback and maintaining a culture of compliance that the Group can assess the effectiveness of its practices and procedures.
- IntoWork Australia supplies temporary personnel and apprentices to a number of clients. In this respect we have established procedures to ensure that those employees have a right to work in Australia. This involves asking the individual directly to confirm their right to work and maintaining documented evidence of this right to work.
- IntoWork Australia also ensures that where we are responsible for such temporary personnel whilst they are employed on our client's premises, they are free to leave their assignment on reasonable notice and operate under fair conditions. These conditions are inspected in advance of labour hire staff being provided to other companies.

- From 2025 annual communications will be implemented to ensure all IntoWork business leaders understand our commitment to the principles of modern slavery reduction and prevention.

If we were to find evidence that one of our suppliers or clients fails to comply with our Modern Slavery commitment, we would require the relevant party to remedy such non-compliance, and we would terminate our relationship should we see no timely improvement in the way their business is conducted.

In addition, regular suppliers to the IntoWork Australia Group of businesses are required to confirm that they oppose all forms of slavery and forced labour and are committed to providing such information and evidence to demonstrate this.

All suppliers that engage with IntoWork Australia are required to provide this confirmation to IntoWork in order to supply goods or services to the Group and we have seen a significant growth in the number of companies providing confirmation to IntoWork Australia.

In 2023 we instigated contractual terms in high-risk service supplier areas to allow “open book” wage auditing, providing IntoWork the right to audit wages of supplier staff to ensure pay rates meet legislation requirements.

IntoWork Australia has a fact sheet on Modern Slavery. This provides a clear snapshot on what modern slavery is, which acts to educate those in Procurement of the risks and the importance of considering modern slavery within our supply chain.

## 5. Effectiveness of our actions

Effective identification, recording and mitigation of modern slavery risks for the Intowork group means we can positively impact our team, our suppliers and individuals and groups in the community by having a lasting social impact. To strengthen our commitment to eradicating modern slavery, Intowork has implemented a robust third-party modern slavery reporting platform, to enhance transparency and risk management across our supply chain. This centralised system captures, identifies, and organises supplier data, including geographical locations and supply chain details. The modern slavery platform enables us to utilise benchmarking and KPI's to assess the effectiveness of our actions including assessing risks and providing a comprehensive view of potential modern slavery vulnerabilities.

Existing and new suppliers are required to be screened through the new modern slavery reporting platform. Suppliers are required to complete an online questionnaire which captures information on the supplier and their supply chain. Based on the information provided this allows IntoWork to determine the risks associated with the supplier and their supply chain, essentially building a transparent view of where they source their goods and services from and their modern slavery risks. We intend to carry this process forward as an annual assessment of our operations and supply chain.

We regularly conduct reviews across different spend categories, in which we carry out bespoke risk management activities which includes modern slavery. When conducting spend reviews, we identify the inherent risk of an industry by using the Global Slavery Index. As part of identifying the inherent risk we introduce appropriate risk management strategies to help eliminate or mitigate the identified risks.

Our procurement team is also responsible for oversight on our suppliers in conjunction with stakeholders in our operations teams. There is an escalation process in which any team member can reach out to the procurement team for assistance and support. Where contact with procurement is made, the procurement team will respond directly to the requestor and conduct further investigation if deemed necessary. Our procurement email inbox is setup to capture any enquiries including modern slavery risks. In the 2025 financial year we received no reports of modern slavery issues or concerns in our procurement inbox.

Underpinning these key strategies is our overall risk management framework which is based on best practise risk management models which helps us manage multiple areas within our organisation including modern slavery risks. The risk management framework contains key steps including identifying the risks, analyse and assessing risks, evaluating and ranking the risk, controlling and mitigating risks and finally monitor and reviewing the risk. These key steps are utilised in various activities including activities that relate to our supply chain and help us mitigate or eliminate modern slavery risks.

In addition, we regularly review information provided by external sources such as the Global Slavery Index and similar evaluative resources for identifying potential risks to our commitment to modern slavery. We work closely with our departments such as HR and the IntoWork businesses Contact Centre to identify any potential personnel at risk, or companies we work with who may have indicators of non-compliance with modern slavery principles. Such indicators will

include concerns expressed by our staff in dealing with these companies, and any legal or media alerts to potential companies of concern.

## 6. Next Steps

In the years to come, IntoWork Australia will:

- Work to increase collaboration with internal and external stakeholders to prevent and address any contribution that we may have to the global issue of modern slavery. We will achieve this by focusing on raising awareness of the forms of modern slavery among our employees and suppliers, continuing to evolve our due diligence processes to aid in the identification of risks, reviewing existing processes and exploring ways to improve identification and action on risks throughout our supply chain;
- Ensure that all high-risk contracts between IntoWork Australia and a supplier contain appropriate clauses relating to ethical workplace practices and modern slavery;
- Ensure existing suppliers are provided with the IntoWork Australia Supplier Code of Conduct;
- Continue to review the Global Slavery Index and other measures to confirm areas of vulnerability for our entities;
- Continue to invest in training of staff to enable IntoWork Australia and its Group of businesses to question suppliers and maintain a register of Modern Slavery policies from our suppliers, providing further transparency in the actions taken.
- Implement a formal escalation process for staff to contact the IntoWork procurement team to assist in identifying and recording of issues.

## 7. Approval

This statement is made pursuant to the Commonwealth Modern Slavery Act 2018 and constitutes IntoWork Australia's slavery and human trafficking statement for the financial year ending 30 June 2025.

During the reporting period this statement covers, IntoWork actively engaged and consulted with all companies within the Group during the development of this statement. We discussed the Modern Slavery Act 2018 reporting requirements; information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

The Board of Directors has approved this statement.



Poul Bottern  
Group Chief Executive Officer

### POLICY VERSION HISTORY

Rev.	Date	Description of Amendments	Amended By	Approved By
0	24/02/2021	Policy Creation	Procurement	Board of Directors
1.0	03/12/2021	Inclusion of new businesses and business descriptions. Updated Policy on Modern Slavery, Due Diligence and reference to the Modern Slavery fact sheet. Updated references to 2021.	Procurement	Board of Directors

2.0	30/11/2022	Update to IntoWork legal name, inclusion of new businesses and Vendor Panel, and updated references to 2022.	Procurement	Board of Directors
3.0	29/11/2023	Acquisition of GO2 by IntoWork occurred on 15 June 2023. GO2 People, GO2 recruitment, Skill Hire WA, NARA Training and Assessing, and Hunter Executive Search Consultants have been added to this document. Also added the statement from the Australian Border Force Modern Slavery Act Supplementary Guidance into our section on Supply Chain and made minor wording amendments.	Procurement	Board of Directors
4.0	30/10/2024	The merger of Help Enterprises, have been added to this document, along with updates to the contract management system, next steps and some minor wording amendments.	Procurement	Board of Directors
5.0	26/11/2025	<ul style="list-style-type: none"> <li>• Updates to business descriptors</li> <li>• Inclusion of Spend category insights</li> <li>• Re-wording of Effectiveness of our actions</li> </ul>	Procurement	Board of Directors