

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

- IntoWork Australia Ltd coordinates the IntoWork Australia Group as appropriate, and primarily provides shared services to Group businesses.
- Gippsland Group Training Ltd, trading as AGA Apprenticeships Plus, is a Group Training Organisation (GTO), Registered Training Organisation (RTO) and partner of MAS National for the delivery of Apprenticeship Network Provider services in Victoria.
- Hume Employment Service Ltd (Kestrel Recruitment) is a Group Training Organisation (GTO) operating in North East Victoria and Southern New South Wales and partners with Mas to deliver Apprenticeship Network Provider services in Victoria.
- Interact Australia Ltd is a Disability Employment Service provider, a provider of Disability Community Services, and a registered service provider for the National Disability Insurance Scheme.
- MAS National Ltd and its Controlled Entities is an Apprenticeship Network Provider, servicing South Australia, Victoria, Queensland and Tasmania. MAS National holds a number of government contracts and also provides WorkSafe consultation services.
- Work & Training Ltd is a GTO, RTO and Foundations Skills service provider throughout Tasmania, and holds a number of government contracts.
- Capricornia Training Company Ltd is a GTO and service provider of the Youth Housing and Reintegration Services program across Central Queensland.
- 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.
- During 2022, MRAEL acquired DGT Employment & Training (formerly Downs Group Training), a GTO and RTO organization in Queensland.
- Hospitality Training Network Ltd (HTN) operates as an apprenticeship employment organisation (GTO) for the tourism, hospitality and food service industries. HTN has serviced New South Wales and the Australian Capital Territory for the past 30 years.
- Plus Recruitment Pty Ltd is the parent entity of the following businesses:
  - Stockdale Personnel Pty Ltd is a leading Print industry recruitment and labour hire company with offices in Melbourne and Sydney.
  - FindStaff Pty Ltd (previously known as Susan Rogan Child Care Services Pty Ltd) is a provider of blue and white collar labour hire as well as high quality experienced educators for child care centres as well as nannies for families.
  - Institute of Training and Further Education Pty Ltd is a quality RTO delivering short and certificate courses.

IntoWork Australia had revenues during the 2022 financial year of \$240m and employees of circa 1500.

## 2. Our Supply Chain

As a provider of recruitment, training and apprenticeship services, we consider our supply chain to be relatively simple in comparison to many other industries. We work with a small 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. Therefore, we have close relationships with our suppliers.

We believe that there is a relatively low risk of labour exploitation or other forms of slavery and human trafficking occurring within it. Nevertheless, we are committed to preventing these practices from occurring within both our business and supply chain, which is demonstrated by our practices.

### **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 2022 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 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 a number of procedures in place in relation to our employees to proactively manage any risk, including robust recruitment processes in line with Australian employment laws and encouraging employees to report any concerns.

All 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 in 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.

As part of our own business 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.

We also ensure 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.

In the event that we were to find evidence that one of our suppliers or clients has failed to comply with the Modern Slavery then we would require the relevant party to remedy such non-compliance, and we would terminate our relationship should we see no 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 that demonstrates this.

During the course of the 2022 financial year 381 suppliers provided this commitment to IntoWork Australia and Group companies, and more are expected throughout the course of 2023. In addition, our onboarding of Vendor Panel Contract Management system has allowed us to compile a repository of Modern Slavery policies from our key suppliers, and we hold copies of 14 Modern Slavery Statements against key contract providers which have been reviewed and discussed with the suppliers.

In 2022 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 developed a fact sheet on Modern Slavery. This provides a clear snap shot 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

We will know the effectiveness of the steps that we are taking to ensure that slavery is not taking place within our business or supply chain if no reports are received from employees, clients, candidates, members of the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

## 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.

We are also investing in training and procurement 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.

## 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 2020.

During the reporting period this statement covers, IntoWork actively engaged and consulted with all companies within the Group and the development of this statement. We discussed the Modern Slavery Act 2018’s 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.

A handwritten signature in black ink, appearing to read "Poul Bottern".

Poul Bottern  
Group Chief Executive Officer

30 November 2022

**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