

SKILLSNEST

Sourcing & Supply of Skilled Workers for Regional Australian Employers

Modern Slavery Statement

Voluntary Statement — Reporting Year 2026

Prepared with reference to the mandatory reporting criteria of section 16 of the Modern Slavery Act 2018 (Cth)

Document title	SkillsNest Modern Slavery Statement
Reporting entity	SkillsNest Pty Ltd (ABN 78 688 545 520)
Reporting period	[1 July 2026 – 30 June 2027]
Status	Voluntary statement. SkillsNest's annual consolidated revenue is below the A\$100 million mandatory reporting threshold under the Modern Slavery Act 2018 (Cth). This Statement is published voluntarily, in good faith, and in substantial conformity with the Act's mandatory reporting criteria.
Approved by	Board of Directors, SkillsNest Pty Ltd, on 27 June 2026
Signed by	Managing Director, SkillsNest Pty Ltd
Next statement due	Within 12 months of this Statement, or earlier should SkillsNest's revenue approach the mandatory threshold
Associated documents	Ethical Recruitment Policy v1.0 · Anti-Bribery and Corruption Policy v1.0 · Offshore Sourcing Partner Agreements · Whistleblower Procedure

Published at www.skillsnest.com.au

A Statement from the Managing Director

SkillsNest exists because regional Australian employers cannot find the skilled workers they need, and because skilled workers in the Philippines, India, and across the Pacific cannot find a fair, transparent path to use those skills in Australia. We built this business to close that gap honestly.

We also built it knowing that the industry we operate in — labour migration, overseas recruitment, and the supply of workers into regional Australia — is one that the Australian Border Force, the Australian Anti-Slavery Commissioner, the NSW Anti-Slavery Commissioner, and international bodies including the United Nations Special Rapporteur on Contemporary Forms of Slavery have all identified as carrying elevated modern slavery risk. We do not publish this Statement to claim that risk does not exist in our sector. We publish it because it does, and because the only credible response to that risk is transparency about it.

SkillsNest's annual consolidated revenue does not currently meet the A\$100 million threshold that triggers mandatory reporting under the Modern Slavery Act 2018 (Cth). We have chosen to publish this Statement voluntarily, modelled on the Act's six mandatory reporting criteria, because we believe that candidates, employer clients, and the public deserve to know how we identify, manage, and remediate modern slavery risk — regardless of whether the law currently compels us to tell them.

This is our first Statement. It will not be perfect, and we say so directly in the sections that follow: our processes are still maturing, our visibility into some parts of our supply chain is still developing, and several of the actions described in this Statement are commitments we are in the process of implementing rather than achievements we have already completed. We have chosen to be specific about that distinction throughout this document rather than blur it.

We commit to reviewing and republishing this Statement at least annually, to reporting honestly on what has and has not worked, and to acting — including by ending relationships with partners or employers where necessary — when we identify a real risk to a real person in our operations or supply chain.

Sumeet Kumar

Managing Director, SkillsNest Pty Ltd

27 June 2026

Criterion 1 — Our Structure, Operations, and Supply Chains

1.1 Reporting entity

This Statement is made by SkillsNest Pty Ltd (ABN [ABN]), an Australian proprietary company. SkillsNest has no subsidiaries and does not currently control or own any other reporting entity for the purposes of the Act. SkillsNest is headquartered in [location], Australia, and as at the date of this Statement has [X] employees and engages contractors and partners as described in Section 1.3 below.

1.2 Our operations

SkillsNest is a sourcing and workforce-services business. We connect skilled candidates — both within Australia and overseas — with Australian employers, predominantly regional employers, across industries including aged care, disability and NDIS services, nursing and allied health, construction and trades, meat processing, mining and resources, engineering, hospitality, transport and logistics, manufacturing, and agriculture.

Our services fall into three categories, each of which carries a different modern slavery risk profile, set out in detail in Criterion 2:

- **Onshore and offshore sourcing and recruitment:** identifying, screening, and presenting candidates to employer clients for permanent or sponsored roles.
- **Migration and sponsorship support:** coordinating Standard Business Sponsorship, Nomination, Labour Market Testing, and visa-related processes, delivered through independent Registered Migration Agents engaged under contract.
- **Offshore back-office placement:** connecting Australian employers with offshore workers (Philippines and India) for back-office and administrative functions, delivered through subcontracted overseas service providers, with SkillsNest acting as a commission-based intermediary rather than the direct employer.

1.3 Our supply chain

SkillsNest's supply chain — the people, entities, and arrangements through which our services are produced and delivered — includes:

Supply chain category	Description
Overseas sourcing partners	Recruitment agencies licensed in the Philippines (POEA) and India (Ministry of External Affairs / NSDC-registered) that identify and pre-screen candidates on SkillsNest's behalf.
Registered Migration Agents (RMAs)	Independently contracted, OMARA-registered migration agents who provide immigration advice and prepare sponsorship, nomination, and visa documentation. Engaged on an independent contractor basis, not employed by SkillsNest.

Supply chain category	Description
Registered Training Organisations (RTOs)	Vocational training providers delivering bridging and credentialing programs (e.g. Certificate III in Individual Support, Diploma of Nursing pathway programs) to candidates ahead of placement.
English-language testing and skills-assessment bodies	PTE, IELTS, OET providers; assessing authorities including TRA, VETASSESS, ANMAC, EA, ACS, AHPRA, ACECQA.
Offshore back-office subcontractors	Philippines- and India-based service providers employing or engaging back-office workers placed with Australian employer clients on a commission basis.
Accommodation and settlement-service providers	Where SkillsNest refers candidates to accommodation or settlement support during relocation, the providers of those services.
Employer clients	Australian businesses engaging SkillsNest's services. Employer clients are not strictly part of SkillsNest's 'supply chain' under the Act, but are the entities whose own labour practices materially affect the welfare of workers SkillsNest has sourced or placed — and are treated as a distinct risk category in this Statement accordingly.
Corporate and technology suppliers	Applicant tracking system / CRM providers, case-management software, cloud hosting, office services. Standard lower-risk professional-services supply chain.

A note on what we do not control

SkillsNest does not employ the candidates and workers we source, except where we directly engage offshore back-office or administrative staff under our own arrangements. In the great majority of placements, the employment relationship is between the candidate and the employer client, or between the offshore worker and the overseas subcontractor. This matters for how we describe our risk and our influence in this Statement: we do not have direct operational control over an employer client's payroll, accommodation, or workplace conditions, and we are honest about the limits of our visibility and leverage in Criterion 2 and Criterion 3, rather than overstating what we can guarantee.

Criterion 2 — Modern Slavery Risks in Our Operations and Supply Chains

We assess modern slavery risk using the recognised lens of three factors: sector and industry risk, geographic risk, and the nature of the business relationship (in particular, the degree of control or influence SkillsNest has over working conditions). This section sets out our assessment honestly, including risks that arise from the structure of our own industry and from third-party schemes we do not operate but whose workers we may place into employment.

2.1 Why our sector carries elevated risk

Migration-linked recruitment and labour supply is recognised globally, and by Australian regulators specifically, as a higher-risk sector for modern slavery. The reasons are structural, not incidental:

- Workers relocating internationally for employment often depend on a single employer or sponsor for their visa status, income, and sometimes accommodation — a dependency that, left unchecked, can be exploited
- Recruitment fees charged to workers (rather than to employers) are a recognised driver of debt bondage, because workers who have paid or borrowed to secure a job are less able to leave it freely
- Information and language asymmetry between candidates in source countries and Australian immigration and employment systems creates scope for deception about wages, conditions, and visa terms
- Industries with seasonal, physically demanding, or socially undervalued work — aged care, meat processing, agriculture, hospitality, construction — have a documented history of labour exploitation in Australia, independent of any particular recruiter or scheme

2.2 Risk by category of operation

The following table summarises our current risk assessment by category of operation. Ratings reflect the inherent risk in the activity before SkillsNest's controls are applied (see Criterion 3), and are reviewed annually.

Operation / relationship	Nature of the risk	Inherent risk rating
Overseas sourcing partners (Philippines, India)	Risk that a partner agency charges candidates recruitment or placement fees, retains identity documents, or misrepresents job terms to secure candidate sign-up.	HIGH
Candidate fee structures (SkillsNest's own)	Risk that fee structures, if poorly designed, create debt-like obligations or are perceived to condition assistance on a sponsorship outcome (also addressed in our Ethical Recruitment Policy under s.245AR of the Migration Act).	MEDIUM

Operation / relationship	Nature of the risk	Inherent risk rating
Employer client workplace conditions post-placement	Risk that an employer client, after a worker is placed, underpays wages, makes unlawful deductions, restricts freedom of movement, or otherwise exploits a worker whose visa is tied to that employer. SkillsNest has limited direct operational control once placement is complete.	HIGH
PALM-scheme adjacent activity	Where SkillsNest refers or partners with employers participating in the Pacific Australia Labour Mobility scheme, the scheme itself has been identified by the NSW Anti-Slavery Commissioner and independent researchers as carrying modern slavery risk indicators, principally because PALM workers are tied to a single approved employer and face restricted ability to change employer. This is a risk inherent to the scheme's design, not to any individual operator, but it is a risk we must manage carefully in any partnership.	HIGH
Offshore back-office subcontractors	Risk that an overseas subcontractor underpays, misclassifies, or imposes excessive hours on offshore workers placed with Australian employer clients, particularly where SkillsNest's visibility into the subcontractor's own employment practices is limited.	MEDIUM
Accommodation arranged in connection with relocation	Risk of substandard, overcrowded, or excessively priced accommodation tied to employment, a recognised modern slavery indicator (particularly documented in PALM-scheme and working-holiday-maker contexts in Australian regional and remote areas).	MEDIUM
RTOs and credentialing providers	Lower risk, but includes the risk of predatory or low-quality training providers extracting fees from candidates for qualifications of little genuine value.	LOWER
Corporate and technology supply chain	Standard professional-services and SaaS supply chain. Lower inherent risk, monitored on a standard due-diligence basis rather than enhanced monitoring.	LOWER

2.3 What the evidence tells us about our specific sector

We do not rely solely on general risk frameworks. We track sector-specific evidence directly relevant to our operations, and we report on it candidly here rather than only in internal documents:

- Government data (Department of Employment and Workplace Relations, PALM scheme reporting) records over 32,000 workers engaged under the PALM scheme as at late 2025, concentrated in agriculture, meat processing, and aged care — three of SkillsNest's target industries

- The NSW Anti-Slavery Commissioner's 2024 report identified indicators of forced labour, deceptive recruiting, and in some cases sexual servitude risk associated with the PALM scheme's single-employer visa structure
- Public reporting in 2025 and 2026 has documented specific instances of PALM workers facing excessive wage deductions for airfares, accommodation, transport and equipment, in some cases reducing effective take-home pay substantially below the headline wage advertised at recruitment
- Independent research (Migrant Justice Institute, The Australia Institute) has found that a majority of surveyed PALM workers report they would change employer if permitted to do so — a strong indicator, under the ILO's forced labour framework, of restricted exit rather than free choice of employment
- The UN Special Rapporteur on Contemporary Forms of Slavery has separately characterised employer-tied temporary and seasonal migration schemes, internationally, as a 'breeding ground' for modern slavery risk where exit options are constrained

We set this evidence out plainly because it is directly relevant to decisions SkillsNest makes about whether, and how, to engage with PALM-scheme-adjacent employers and intermediaries. Our position and the specific controls we apply as a result are described in Criterion 3.

2.4 Geographic risk factors

Our overseas sourcing operations are concentrated in the Philippines and India, both of which carry elevated structural risk for labour exploitation in international recruitment, reflected in independent indices including the Global Slavery Index and the U.S. Department of State Trafficking in Persons reports. Risk in these geographies is associated less with state complicity than with the prevalence of informal and unlicensed recruitment intermediaries, debt-based migration financing, and limited worker awareness of rights once in Australia. Our due diligence approach (Criterion 3) is calibrated specifically to these risk drivers.

Criterion 3 — Actions We Take to Assess and Address These Risks

This Statement distinguishes, throughout this section, between controls that are fully implemented and operating, and commitments we are in the process of building. We have marked each accordingly so that this Statement does not overstate our maturity.

3.1 Governing policy framework

Our actions are anchored in two board-approved policies, both publicly available on our website:

- **Ethical Recruitment Policy (v1.0):** establishes the Employer Pays Principle, prohibits charging candidates for sponsorship-related events, sets partner due-diligence and contract standards, and establishes our grievance and remedy framework.
- **Anti-Bribery and Corruption Policy (v1.0):** addresses the corruption-adjacent risks that frequently accompany migration fraud and exploitative recruitment, including facilitation payments and falsified Labour Market Testing or qualification documents.

3.2 Recruitment-stage controls

Action	Description	Status
Employer Pays Principle	Candidates are not charged for sponsorship, nomination, or visa-grant events. Lawful candidate charges are limited to genuinely rendered pre-arrival and settlement services, disclosed in advance under a separate services agreement.	Implemented — policy in force
No retention of identity documents	SkillsNest, its staff, and contracted partners do not retain candidates' original passports, identity documents, or qualification certificates.	Implemented — policy in force
Written, plain-language job and visa information	Candidates receive job descriptions, salary, conditions, and visa-pathway information in writing before accepting any role.	Implemented — policy in force
No debt-financing of recruitment costs by SkillsNest or its partners	SkillsNest does not advance loans to candidates against future earnings and prohibits contracted overseas partners from doing so.	Implemented — policy in force

Action	Description	Status
Pre-engagement due diligence on overseas sourcing partners	Verification of local recruitment licensing (POEA, MEA/RA), director and beneficial-ownership screening, adverse-media checks, and reference checks before engagement.	Implemented for current partners; standard process for all new partners going forward
Mandatory no-candidate-fee clause in partner contracts	Every overseas sourcing partner contract prohibits charging candidates a recruitment, placement, processing, or introduction fee in connection with SkillsNest engagements.	Implemented — standard contract clause

3.3 Ongoing monitoring and partner oversight

Action	Description	Status
Annual partner audit (high-risk tier)	Onsite or video audit of overseas sourcing partners classified as high risk under our Anti-Bribery and Corruption Policy's risk-tiering framework.	Building — first audit cycle scheduled within 12 months of this Statement
Partner right-of-audit clause	Contracts give SkillsNest the right to audit partner operations and records on reasonable notice.	Implemented — standard contract clause
Worker check-ins independent of host employer	For sponsored and PALM-scheme-adjacent placements, periodic check-ins with placed workers, conducted separately from the host employer, to surface concerns about pay, accommodation, deductions, or freedom of movement.	Building — process being formalised; piloted on early placements
Modern slavery indicator training for staff	Staff and contractors trained to recognise ILO Forced Labour Indicators — debt to a recruiter or employer, document retention by a third party, excessive hours, restricted communication or movement, coached responses to questions.	Building — included in induction; annual refresher to be implemented in year one
Vetting of PALM-scheme-adjacent partnerships	Where SkillsNest engages with employers or intermediaries	Policy commitment in place (Ethical

Action	Description	Status
	connected to the PALM scheme, additional due diligence is applied, including requiring a published worker-welfare framework and an independent worker-advocate channel before any partnership proceeds.	Recruitment Policy §13.5); first partnerships under evaluation, none yet concluded as at this Statement

3.4 Employer client engagement controls

Because SkillsNest does not directly control an employer client's workplace once a placement is made, our principal lever is at the point of engagement and through the terms of the relationship:

- Employer Engagement Letters require acknowledgement of, and agreement to operate consistently with, SkillsNest's Ethical Recruitment Policy as a condition of engagement
- SkillsNest declines to act for, or terminates engagement with, any employer who proposes cost-recovery arrangements against a sponsored worker's wages, or who otherwise signals an intent to circumvent lawful working conditions
- Sponsored workers are provided written information, independent of the employer, about their right to change sponsor within the applicable grace period, their right to lodge a Fair Work Ombudsman complaint without fear of visa cancellation under the Assurance Protocol, and how to contact SkillsNest directly with any post-placement concern
- We are developing a basic pre-engagement screening checklist for new employer clients in higher-risk industries (meat processing, agriculture, hospitality), to flag employers with adverse Fair Work Ombudsman findings or labour-hire licence issues before engagement — this is in development and not yet a completed control

3.5 Grievance and remedy

Our Ethical Recruitment Policy establishes a free, confidential complaints channel available to every candidate and worker, published in our Candidate Information Pack and on our website. Candidates and workers are also directed to external channels independent of SkillsNest, including the Fair Work Ombudsman, the Australian Border Force, OMARA, and the relevant state labour-hire licensing authority. Where SkillsNest has caused or contributed to harm, our policy commits to remedy proportionate to that harm. As at this Statement, we have not received a complaint amounting to a modern slavery indicator; the channel and its publication are nonetheless treated as a foundational control, not a reactive one.

3.6 Honest account of current limitations

What we have not yet done

We are a young business, and this is our first Statement. In the interest of giving an accurate picture rather than a polished one, we record here what is not yet in place:

We have not yet completed a formal onsite audit of any overseas sourcing partner — this is scheduled within the next 12 months.

Our worker check-in process for placed candidates is in early-stage piloting, not yet a systematic, scheduled process across all placements.

We have not yet engaged an independent third party to verify our modern slavery due diligence — we intend to commission this from year two of operations, consistent with the commitment in our Ethical Recruitment Policy.

We have limited visibility into the day-to-day working conditions of offshore back-office workers placed through subcontracted overseas providers, and are developing a more structured monitoring approach for this category.

We have not yet finalised the pre-engagement employer screening checklist described in Section 3.4.

Criterion 4 — Assessing the Effectiveness of Our Actions

Assessing effectiveness honestly is harder than describing actions, particularly for a young business with a small placement volume to date. We set out below the indicators we currently track, what they show, and where our measurement is still maturing.

4.1 Current indicators

Indicator	What it measures	Current position
Overseas sourcing partners under signed no-candidate-fee contract	Coverage of our contractual control against the most common modern slavery driver in our sector	[X] of [X] active partners (target: 100%)
Candidate complaints alleging fee charges, document retention, or coercion	Direct evidence of whether our controls are preventing the specific harms they target	[Nil to date / X recorded], reviewed at each Quarterly Ethical Recruitment Review
Placements into PALM-scheme-adjacent arrangements	Our direct exposure to the highest-risk category identified in Criterion 2	[Nil to date / X], each subject to the enhanced due diligence described in §3.3
Staff completion of modern slavery indicator training	Whether our people are actually equipped to recognise risk indicators in practice, not just in policy	[Tracking to be reported in next Statement]
Partner audits completed against partners classified high-risk	Whether our highest-risk relationships are receiving the scrutiny our own risk framework says they should	0 completed to date; first cycle scheduled

4.2 What we can credibly claim, and what we cannot — yet

We can credibly claim that our policy framework directly addresses the specific, evidence-based risks identified in Criterion 2 — particularly candidate fee charging, document retention, and employer-tie dependency — rather than addressing modern slavery in only generic terms. We can also claim that our commercial model itself, structured around the Employer Pays Principle, removes one of the most common drivers of debt bondage in international recruitment by design, rather than by monitoring alone.

We cannot yet claim that our monitoring and audit processes are mature. Given our scale and the early stage of our partner relationships, our primary evidence of effectiveness to date is the absence of adverse findings, which is a necessary but not sufficient indicator — an absence of complaints can reflect genuine absence of harm, or it can reflect workers' limited awareness of how to complain, particularly in their first months in Australia. We treat this distinction seriously and have prioritised the worker check-in process described in Section 3.3 specifically to address it, rather than relying on inbound complaints alone.

4.3 External benchmarking

Once our placement volume and partner network are large enough to be meaningfully assessed, we intend to commission an independent external review of our modern slavery due diligence (committed to in our Ethical Recruitment Policy, targeted from year two of operations). Until that review occurs, readers of this Statement should treat our self-assessment as exactly that — a self-assessment, presented with the limitations above made explicit.

Criterion 5 — Consultation Process

SkillsNest Pty Ltd has no subsidiaries and is not currently part of a corporate group for the purposes of the Act. This Statement was nonetheless prepared through a consultation process appropriate to our structure:

- Drafted by the Director with operational responsibility for ethical recruitment and ABC compliance, drawing on the Ethical Recruitment Policy and Anti-Bribery and Corruption Policy approved by the Board
- Reviewed by both founding directors, including specific review of the risk assessment in Criterion 2 and the honest-limitations disclosure in Criterion 3
- Reviewed by SkillsNest's contracted Registered Migration Agents for accuracy of migration-specific content, including the description of sponsorship and visa processes
- Approved by the Board of Directors prior to publication

As SkillsNest grows — including if we engage additional entities, enter joint ventures, or establish overseas subsidiaries — this Statement's consultation process will be expanded accordingly, and any future statement covering multiple entities will describe the consultation undertaken with each.

Criterion 6 — Other Relevant Information

6.1 Why we publish this Statement voluntarily

We are below the mandatory reporting threshold and could lawfully say nothing. We have chosen not to, for three reasons. First, the candidates and workers our business touches are exactly the population the Modern Slavery Act exists to protect, regardless of our company's revenue. Second, our Ethical Recruitment Policy already commits us to many of the practices the Act asks reporting entities to describe, and writing them up formally forces a discipline that an internal policy alone does not. Third, we believe that voluntary, credible reporting by small and emerging businesses in higher-risk sectors is part of what a genuinely improved system looks like — and we would rather build that habit now, while our scale is small and our mistakes are correctable, than wait until growth makes the stakes higher.

6.2 Our position on industry-wide risk we do not control

Some of the risk described in this Statement — most significantly the structural risk associated with the PALM scheme's single-employer visa design — is a feature of a government scheme, not a feature of SkillsNest's own conduct. We do not believe it is honest to omit this risk from our Statement merely because we do not control the scheme's design. Where we engage with PALM-scheme-adjacent employers or intermediaries at all, we do so applying the enhanced due diligence described in Section 3.3, and we will state plainly in future statements if we decide, based on our experience or on the evidence available, that the risk in a particular arrangement cannot be adequately managed and that we have declined or withdrawn from it.

6.3 Engagement with the Anti-Slavery Commissioner and sector bodies

SkillsNest intends to engage constructively with the Australian Anti-Slavery Commissioner's office and, where relevant to our regional NSW operations, the NSW Anti-Slavery Commissioner, including by seeking guidance on best practice for small and medium entities in the migration and labour-supply sector. We will report on the outcome of this engagement in future statements.

6.4 COVID-era and historical matters

This is SkillsNest's first Statement. There are no historical modern slavery incidents, findings, or remediation matters to report from a prior reporting period, as no prior Statement has been published.

6.5 How to raise a concern about this Statement or our practices

Any person — candidate, worker, employer client, partner, journalist, researcher, or member of the public — who has information or concerns relevant to modern slavery risk in SkillsNest's operations or supply chain is invited to contact us directly. Concerns may also be raised through the channels described in our Ethical Recruitment Policy, including external channels independent of SkillsNest such as the Fair Work Ombudsman and the Australian Border Force.

Contact

Email: [info@skillsnest.com.au / appropriate address]

Post: Managing Director, SkillsNest Pty Ltd, Level 3, 87 Marsden Street, Parramatta NSW 2150.

Concerns may be raised anonymously. See our Ethical Recruitment Policy and Whistleblower Procedure for full detail on protections against retaliation.

Our Commitments for the Next Reporting Period

In the interest of being held to account by our own Statement, we set out below the specific, checkable commitments we are making for the next 12 months. We will report against each of these, by name, in our next Statement.

Commitment	Owner	Target
Complete first onsite or video audit of each high-risk-tier overseas sourcing partner	Director — Operations	Within 12 months
Formalise the worker check-in process into a scheduled, documented process for all sponsored and PALM-adjacent placements	Director — Operations	Within 6 months
Deliver annual modern slavery indicator refresher training to all staff and contractors	Director	Within 12 months
Finalise and implement pre-engagement employer screening checklist for higher-risk industries	Director — Operations	Within 6 months
Engage with the Australian and/or NSW Anti-Slavery Commissioner's office for sector-specific guidance	Managing Director	Within 12 months
Scope and budget an independent external review of modern slavery due diligence, targeted for year two	Board	Scoping within 12 months
Publish next Modern Slavery Statement reporting against each of the above by name	Managing Director	Within 12 months of this Statement

Final note

This Statement is published voluntarily and is reviewed and approved by the Board of Directors of SkillsNest Pty Ltd. It reflects our genuine assessment of modern slavery risk in our operations and supply chains as at the date below, including the limitations in our current controls. We treat the publication of this Statement as the start of an annual discipline, not a one-off compliance exercise, and we welcome scrutiny of it.

Approved by the Board of Directors of SkillsNest Pty Ltd on [date].

Signed on behalf of the Board:

Name: Sumeet Kumar	Title: Managing Director
Signature:	Date: 27 June 2026

— End of SkillsNest Modern Slavery Statement —