



# Vision Australia

## Modern Slavery Statement

**March 2022**

### Position Statement Summary

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (CTH) by Vision Australia Limited and its controlled entities (Vision Australia Group).

This statement covers the activities of the following Vision Australia Group Entities:

- Vision Australia Limited – ABN 67 108 391 831
- Vision Australia Foundation – ABN 91 007 428 284
- Vision Australia Trust – ABN 88 646 584 335
- Seeing Eye Dogs Australia Pty Limited – ABN 28 004 758 641
- 5RPH Pty Limited – ACN 608 798 661
- 6RPH Pty Limited – ACN 608 797 762
- Quantum Technology Pty Limited – ABN 29 001 381 728

If you would like this position statement in an alternative format or wish to discuss it with Vision Australia's Government Relations and Advocacy team, please contact us:

Vision Australia  
Government Relations & Advocacy Team  
Tel: 1300 84 74 66 (within Australia)  
(+61 2) 9334 3333 (outside Australia)  
Email: [info@visionaustralia.org](mailto:info@visionaustralia.org)  
Website: [www.visionaustralia.org](http://www.visionaustralia.org)

### About Our Business

Vision Australia is a leading national provider of blindness and low vision services in Australia. Our mission is to support people who are blind or have low vision to live the life they choose. We are a for-purpose organisation and a major participant and partner in the international blindness community.

We support more than 25,000 people of all ages and life stages, and circumstances. We do this through more than 30 Vision Australia centres in Victoria, New South Wales, the Australian Capital Territory, Queensland, South Australia and Western

Australia; and through outreach programs in the Northern Territory and Tasmania. We have 833 employees and around 3000 volunteers. Our annual turnover in FY2021 was \$119M. Vision Australia provides the following services: low vision assessment; speech pathology; occupational therapy; physio therapy; psychology; orientation and mobility services; access technology training and assessment; library services; print accessibility; employment services; retail of assistive technology, and Seeing Eye Dogs service.

For more information about Vision Australia, go to:

[www.visionaustralia.org](http://www.visionaustralia.org)

## **Supply Chain**

Vision Australia's supply chain relationships include suppliers from the following sectors: Information, Communication and Technology; Property Services (including Facilities Management, Cleaning, Security); Fleet Management; outsourced Fundraising Services; Print and Promotional Goods and Services; Office Supplies; Corporate Accounting, Legal and Consulting Services; Corporate Clothing; Recruitment Agencies; Finance; Veterinary Supplies and off-shore Digital Services. We also procure assistive technology products and low vision aids for sale in our retail division from overseas suppliers and genetic material for our Seeing Eye Dog breeding programs from local and overseas suppliers.

## **Policy Framework**

Vision Australia is committed to operating our business lawfully and ethically and only working with suppliers that are aligned to our values. We expect our suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking and child labour.

Vision Australia has a range of policies and processes which outline our commitment to ethical business practices and compliance with applicable laws. They include:

- Procurement Policy and Procedures
- Retail Purchasing Policy
- Charter of Professional Behaviours
- Fundraising Integrity Policy
- Modern Slavery Policy
- Supplier Code of Conduct

Vision Australia has ensured its Modern Slavery Policy is a publically available document.

## Due Diligence Processes

Vision Australia considers the risk of modern slavery to be low within most of our direct business operations. However, Vision Australia recognises the risk of indirect exposure to modern slavery and human trafficking through our supply chain.

As part of the procurement process and managing the risks of modern slavery in our supplier chain, Vision Australia has undertaken the following measures:

- a) Developed a modern slavery questionnaire and sent the questionnaire to all suppliers to complete. The questions are filtered based on the categories selected by suppliers. This allows the identification of suppliers who will be required to complete the questionnaire and accordingly will require an annual review;
- b) Through the questionnaire, commenced obtaining data to evaluate the supply chain to verify and address the risks of human trafficking or slave labour;
- c) Provided training to finance procurement staff to educate on the awareness of the modern slavery requirements; and
- d) Published the modern slavery position statement on the Vision Australia website.

All major and high risk suppliers (currently providing or seeking to provide goods or services to Vision Australia) are identified and sent a copy of Vision Australia's Modern Slavery Policy, our Supplier Code of Conduct and asked to complete our Modern Slavery Compliance Questionnaire.

The Modern Slavery Compliance Questionnaire requires all suppliers to confirm that the production and supply of goods and services supplied to Vision Australia and its entities are compliant with the UN Guiding Principles on Business and Human Rights or that all efforts are being made to take action to prevent, mitigate and, where appropriate, remedy modern slavery in the entity's operations and supply chains.

Where suppliers do not complete the questionnaire or demonstrate a lack of compliance with the UN Guiding Principles, Vision Australia will initially work with the supplier to gain compliance and, failing that, will seek alternative suppliers.

Vision Australia acknowledges that the following sectors have greater risk for potential modern slavery, so specific focus has been placed on them as part of this inaugural reporting year: Facilities Management (namely Cleaning Services); Corporate Clothing; Information, Communication & Technology suppliers; and off-shore digital services.

## Monitoring & Reporting

In order to monitor and maintain effective records of our modern slavery compliance requirements, our finance procurement has engaged a third-party provider, Safetrac,

to manage the process for sending questionnaires to suppliers. All evaluations and records to evidence the checks that are undertaken is maintained in Safetrac and managed by the finance procurement. The modern slavery position statement provided by a supplier will be uploaded in Safetrac and flagged within the supplier records in the finance ERP system, NetSuite. The Chief Financial Officer (CFO) will be notified if any suppliers are identified as high risk.

Suppliers will be audited as necessary to evaluate compliance with standards for slavery and human trafficking in our supply chains.

This means we will review and monitor our supply chain for compliance with the legislation by undertaking appropriate due diligence checks, by obtaining compliance statements from our major or higher risk suppliers, and by engaging in periodic business reviews with selected suppliers to evaluate them and the process that they have in place to comply with this requirement.

The CFO will report on the assessment of our supply chain on a quarterly basis to the Leadership Team to identify the actual numbers of suppliers assessed and to identify any possible gaps and areas that require further investigation and or audit.

The CFO must be notified of any suspected slavery or human trafficking, and will promptly validate the risk rating for any claims or allegations that a supplier is engaging in slave labour activities or human trafficking, or is otherwise not complying with this policy. The CFO will escalate the findings to the Chief Executive Officer (CEO), the relevant General Manager and the Manager in-charge of Compliance who is part of the Leadership Team (Compliance Manager). If necessary, the matter will be reported to the Audit Finance and Risk Committee and the Vision Australia Limited Board, along with the findings.

Any identification of modern slavery practice will be reported to the Australia Federal Police (AFP) by the Compliance Manager. After contacting the AFP, or in the case of practices occurring offshore, the Australian Border Force (ABF) will be contacted at [slavery.consultations@abf.gov.au](mailto:slavery.consultations@abf.gov.au). No engagement will be made with the supplier on the allegation and an existing contract will only be terminated as a last resort.

## **Training**

Our policies and statements are available on our intranet and website. Staff are required to familiarise themselves with this policy, our supplier code of conduct and our modern slavery statement. Specific training on eradicating slave labour or human trafficking will be expanded and made available to relevant members of staff. Any queries or questions must be directed to our purchasing email at [Purchasing@visionaustralia.org](mailto:Purchasing@visionaustralia.org).

## Grievance & Feedback

Vision Australia has a Whistleblower (Protected Disclosure) Policy that allows (current and former) employees, volunteers and contractors to raise concerns in a confidential manner. Our external provider is FairCall Whistleblower Hotline (1800 500 965). This channel is available for reporting modern slavery concerns. Employees and third parties can also raise concerns through our complaints mechanism:

[complaints@visionaustralia.org](mailto:complaints@visionaustralia.org)

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This Modern Slavery Statement was approved by the Board of Directors of Vision Australia Limited on 16th March 2022.

*Signed on behalf of the Board of Directors of Vision Australia Limited:*

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**Andrew Moffat**  
Chair (Vision Australia)