

Vision Australia Modern Slavery Policy

Introduction

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.

This policy covers 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

About this policy

Vision Australia is committed to addressing the requirements under the Modern Slavery Act 2018 (Cth) in three ways:

- a) in the procurement of goods and services;
- b) through contract management and monitoring key suppliers; and
- c) preparation and submission of the annual Modern Slavery statement.

To whom does this policy apply

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

Policy

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
- Supplier Code of Conduct
- Fundraising Integrity Policy

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); outsourced Fundraising Services; Print and Promotional Goods and Services; Fleet Management; Office Supplies; Finance; Corporate Clothing; and off-shore Digital Services. We also procure assistive technology products from overseas suppliers for sale in our Retail division.

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 that through its supply chain and customers, it can be indirectly exposed to the risk of modern slavery and human trafficking. 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 suppliers, and by engaging in periodic business reviews with suppliers to evaluate them and the process that they have in place to comply with this requirement.

All major and high-risk suppliers or those with a turnover of greater than \$100m (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.

'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.'

All suppliers must receive a copy of Vision Australia's Supplier code of conduct and sign our supplier compliance statement. No supplier will be appointed to provide goods or services to Vision Australia without first ensuring that these checks have been made and confirmation received that no slavery or human trafficking is occurring in their respective supply chain.

As part of the procurement process, Vision Australia seeks to:

a) Evaluate the supply chain to verify and address the risks of human trafficking or slave labour and to;

(b) Audit suppliers as necessary to evaluate compliance with standards for slavery and human trafficking in our supply chains.

Governance & Leadership Responsibility

The Vision Australia Board is responsible for approving and signing the annual Modern Slavery Statement. Members of the Leadership Team are responsible for the implementation of policy obligations throughout their respective areas of the business. The Chief Financial Officer (CFO) has overall responsibility for the implementation and management of this Policy.

Monitoring & Reporting

In order to monitor and maintain effective records of our modern slavery programme, the finance procurement team will keep records in NetSuite of all supplier position statements received. Safetrac, a third-party provider tool, will be utilised to keep evaluations and records to evidence the checks that are undertaken. Any documents provided by a supplier must be filed against a supplier's record in Safetrac by the finance procurement team. The CFO will report on the assessment of our supply chain on a quarterly basis to identify the actual numbers of suppliers appointed and assessed and to identify any possible gaps and areas that require further investigation and or audit.

The CFO must be notified of any suspected breaches to this policy, 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 of the investigation.

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 is available to relevant members of staff. Any queries or questions must be directed to our purchasing email at Purchasing@visionaustralia.org.

Whistle-blower Policy

Vision Australia has a Whistle-blower (Protected Disclosure) Policy that allows (current and former) employees, volunteers and contractors to raise concerns in a confidential manner. This channel is available for reporting modern slavery concerns.

Our external provider is Fair Call Whistle-blower Hotline (1800 500 965).

Employees and third parties can also raise concerns through our complaints mechanism complaints@visionaustralia.org

References

[Modern Slavery Position Statement](#)

[Procurement Policy and Procedure](#)

[Supplier Code of Conduct](#)

[Retail Purchasing Policy](#)

Document Control

Effective Date: August 2020

Version: 1.0

Policy scope: Level 1

Prepared by: People and Culture

Approved by: The Board

Next Review: March 2024

Version Control:

Version	Prepared by	Effective date	Reason for changes	Summary of Changes
Version 1.0	People and Culture/CFO	August 2020	First version	
Version 2.0	Anjelin Thotakura/ CFO	March 2022	Update on process implemented	Inclusion of subsidiary company names and update on current practise
Version 3.0	Lalini Raj/ Manager Financial Reporting	March 2023	Annual review	

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