**Supplier Code of Conduct**

**Introduction**

Vision Australia is committed to ethical, sustainable and socially responsible procurement.

**About this policy**

This Supplier Code of Conduct (Code) sets out the minimum standards of behaviour that Vision Australia expects its suppliers to meet in the areas of labour and human rights, accessibility, health and safety, environment, business integrity, cyber security and privacy, and supplier diversity.

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

**To whom does this policy apply**

This Policy applies to all Suppliers and for the purpose of this Code, ‘Suppliers’ include contractors and suppliers of goods and services for all Vision Australia Group Entities.

**The Code**

We expect all our suppliers to work in accordance with this code of conduct and with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking and child labour. In order to achieve this Vision Australia expects their suppliers to adopt an open attitude to the monitoring activities that will be implemented and to cooperate fully with our own or any third-party auditors employed.

Where suppliers breach this Code of Conduct, we will try to work with them to improve standards and employee welfare. However, we reserve the right to terminate an arrangement with any Supplier immediately for appropriate transgressions or where there is no willingness to make the necessary improvements. This code is mandatory and may be subject to audit.

Vision Australia’s position statement for Modern Slavery is a publicly available document published on its website. The Modern Slavery policy document is available on our intranet.

**Accessibility**

1. The Federal Disability Discrimination Act 1992 (DDA) provides protection for everyone in Australia against discrimination based on disability. This includes freedom of access to information.
2. As part of the advocacy on behalf of people that are blind or have low vision, Vision Australia seeks to promote the highest accessibility standards. Furthermore, as a major employer of people with blindness and low vision, Vision Australia requires systems and documents to be accessible to its workforce.
3. The Supplier is expected to provide documents that are accessible. Any system used by Vision Australia should be accessible for people who are vision impaired or blind. As a minimum any system should comply with the W3C Web Content Accessibility Guidelines version 2.2 (WCAG 2.2) to Level AA.

**Employment is freely chosen**

1. There is no forced or compulsory labour in any form, including bonded, trafficked, or prison labour.
2. Workers are not required to lodge deposits or their identity papers with their employer and are free to leave their employer after reasonable notice.

**Freedom of association and the right to collective bargaining are respected**

1. Workers have the right to join or form trade unions of their own choosing and to bargain collectively, and the employer has open attitude towards the activities of trade unions and their organisational activities.
2. Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
3. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates without hinderance, the development of appropriate means for independent and free association and bargaining.

**Working conditions are safe**

1. A safe and hygienic working environment is provided, and adequate steps taken to prevent accidents and injury to health arising out of, or associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
2. Workers receive regular and recorded health and safety training, and such training is repeated for new or reassigned workers.
3. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage is provided.
4. Accommodation, where provided, is clean, safe, and meet the basic needs of the workers.
5. The company observing the code assigns responsibility for health and safety to a senior management representative.

**Sustainable Procurement**

1. Vision Australia wishes to share its commitment to ethical procurement with suppliers whose practices conform to applicable ethical standards.

**Child labour is not used**

1. There is no recruitment of child labour.
2. Companies develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
3. Children and young persons under 18 are not to be employed very late at night or in hazardous conditions.

**Living wages are paid**

1. Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event, wages should always be enough to meet basic needs and to provide some discretionary income.
2. All workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
3. Deductions from wages as a disciplinary measure are not permitted nor shall any deductions from wages not provided for by national law be permitted without the express permission of the worker concerned. All disciplinary measures should be recorded.

**Working hours are not excessive**

1. Working hours comply with national laws and benchmark industry standards, whichever affords greater protection, and that workers are not required to work in excess of 48 hours per week and are provided with at least one day off for every 7 days period on average.
2. Overtime should be on a voluntary basis; should not exceed 12 hours a week, is not demanded on a regular basis and always be compensated at a premium rate.

**No discrimination is practiced**

1. There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

**Regular employment is provided**

1. To every extent possible, work performed is on the basis of recognised employment relationship established through national law and practice.
2. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship is not avoided through the use of labour-only contracting, sub-contracting, or home – working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment. Nor is any such obligations avoided through the excessive use of fixed-term contracts of employment.

**No harsh or inhumane treatment is allowed**

1. It is expected that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited.

**Legal requirements**

1. Vision Australia is committed to full compliance with the laws and regulations in each location where Vision Australia conducts business, and will not knowingly operate in violation of any such law or regulation, and will not knowingly use suppliers who violate applicable laws and regulations

**No bribery or corruption will be tolerated**

1. The offering, paying, soliciting or accepting of bribes or kickbacks, including facilitation payments, is strictly prohibited. A bribe may involve giving or offering any form of gift, consideration, reward or an advantage to someone in business or government in order to obtain or retain a commercial advantage or to induce or reward the recipient for acting improperly or where it would be improper for the recipient to accept the benefit. Bribery can also take place where the offer or giving of a bribe is made by or through a third party, e.g. an agent, representative or intermediary.
2. Facilitation payments are small payments or fees requested by government officials to speed up or facilitate the performance of routine government action (such as the provision of a visa or customs clearance). Such payments are strictly prohibited.
3. Suppliers, representatives and their employees are compliant with all applicable anti-bribery and corruption laws in Australia.
4. Suppliers and representatives have in place anti-corruption and bribery procedures to prevent employees or persons associated with its business from committing offences of bribery or corruption. Suppliers and representatives properly implement these procedures into their business and review them regularly to ensure that they are operating effectively.

**Conflict of Interest**

1. It is expected that suppliers avoid actual, potential or perceived conflicts of interest with Vision Australia’s workforce. All Suppliers will declare all interests during the contractual/commission process. This information is reviewed and placed on their contract file.

**Environmental Considerations**

1. Vision Australia is committed to promoting environmental responsibility.
2. Suppliers are expected to minimise the environmental impact of their operations and maintain environmentally responsible policies and practices.
3. Suppliers are expected to comply with all applicable laws and regulations relating to the environment, including any management and reporting obligations. Suppliers are expected to manage the environmental impact of their operations by:

* ensuring the safe storage, transportation and disposal of hazardous substances including hazardous waste.
* maintaining policies and practices for the efficient use of energy, water and natural resource consumption; and
* maintaining policies and practices that reduce the risk of pollution, loss of biodiversity, deforestation, damage to ecosystems and greenhouse gas.

**Intellectual Property & Fair Competition**

1. Suppliers are expected to respect intellectual property rights of Vision Australia and other third parties. Any transfer of technology and knowhow is handled in a manner that protects intellectual property rights.
2. Suppliers are expected to conduct their business in full compliance with anti-trust and fair competition laws, and disclose information regarding business activities, structure, financial situation and performance in accordance with applicable laws.

**Cybersecurity & Privacy**

1. Vision Australia’s Privacy Policy outlines our privacy commitment and explains how we collect, use, disclose and protect personal information of our clients, customers, supporters and workforce members. We expect our suppliers to work with us to fulfil these obligations. Privacy is a non-negotiable part of how we work.
2. Suppliers who collect, use, store or have access to personal information on behalf of Vision Australia are expected to have controls and processes in place to safeguard that information and ensure its use is restricted to the purpose for which is has been provided.
3. Suppliers with access to Vision Australia systems and data are expected to maintain appropriate security measures as required by Vision Australia. This includes enforcing these security measures across their supply chain.
4. Suppliers are expected to monitor compliance with applicable privacy laws and their privacy obligations with Vision Australia. If the Supplier becomes aware of a breach of these obligations the Supplier is expected to immediately notify Vision Australia.

**Diversity**

1. Vision Australia is committed to being a diverse and inclusive company and achieving greater diversity in our supply chain. Vision Australia prefers suppliers who promote diversity in their supply chain.

**Monitoring & Reporting**

Suppliers are expected to self-assess their compliance with the Code and take timely action to correct any deficiencies or breaches reported or identified by an audit, assessment, inspection, investigation or review. Suppliers are encouraged to raise any concerns, discuss and seek clarification accordingly to any elements of the Code with Vision Australia. If requested by Vision Australia, Suppliers are expected to provide evidence and confirmation of their compliance with the Code, including the provision of documents and records that support their compliance.

The Chief Financial Officer (CFO) and the Compliance Manager will be notified of any suspected breaches of the Supplier Code of Conduct and will promptly and thoroughly validate any claims or allegations of breaches of the Code. If necessary, the CFO will escalate their findings to the CEO and relevant General 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.

**Whistleblower Policy**

Vision Australia has a Whistleblower (Protected Disclosure) Policy that allows (current and former) employees, volunteers, contractors and suppliers to raise concerns in a confidential manner. Our external provider is FairCall Whistleblower Hotline (1800 500 965). This channel is available for reporting breaches of this code. Employees and third parties can also raise concerns through our complaint’s mechanism: [complaints@visionaustralia.org](mailto:complaints@visionaustralia.org)

**Related Policies and Resources**

Digital Accessibility Policy

[Disclosure and Management of Interests Policy and Procedure](https://visionaustralia.sharepoint.com/:w:/r/sites/AllVisionAustralia/Policies/Directors%27%20Disclosure%20of%20Interests%20Policy%20Dec%202019_AC.DOCX?d=wb2b301b2cd934d86bbd2286481c984a8&csf=1&web=1&e=1GZma5)

[Environmental Policy](https://www.visionaustralia.org/about-us/governance/core-policies/environmental-sustainability)

[Information Security Policy](https://visionaustralia.sharepoint.com/:w:/r/sites/AllVisionAustralia/Policies/Information%20Security%20Policy.docx?d=w9bfd3a989a8b42cc9b39af4b731989d6&csf=1&e=ACQoTI)

[Modern Slavery Policy](https://www.visionaustralia.org/sites/default/files/2024-04/Modern%20Slavery%20Policy%20%20March%202024.docx)

[Privacy Policy](https://www.visionaustralia.org/about-us/governance/core-policies/private-policy)

[Procurement Policy and Procedure](https://visionaustralia.sharepoint.com/:w:/r/sites/AllVisionAustralia/Policies/Procurement%20Policy%20and%20Procedure.docx)

[Technology Acceptable Use Policy](https://visionaustralia.sharepoint.com/:w:/r/sites/AllVisionAustralia/Policies/Technology%20Acceptable%20Use%20Policy.docx)

[Whistleblower (Protected Disclosure) Policy](https://www.visionaustralia.org/sites/default/files/2024-02/Whistleblower_Protected_Disclosure_Policy_2024.doc)

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Prepared by: People and Culture and Chief Financial Officer

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| Version 1.0 | People and Culture/ CFO | Leadership Team | July 2020 | First Version |  |
| Version 1.2. | People and Culture/ CFO | Leadership Team | May 2022 | Update current policy to reflect cyber security, modern slavery and accessibility | Inclusion of other policies for reference and providing clarity on reporting |
| Version 1.3. | People and Culture/ CFO | Leadership Team | October 2024 | Periodic Review | General review, Addition of links to Resources and Policies |

Ends.