

MODERN SLAVERY POLICY

1. Purpose of Policy

This policy affirms our commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations.

It is consistent with, and forms part of, our Ethical Framework, that expects a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations.

This Policy also supports the intent of international conventions, treaties and protocols relevant to combatting modern slavery and the *Modern Slavery Act (Cth) 2018*¹.

This policy aims to:

- > Acknowledge the risk of Modern Slavery within the State Medical Assistance Operations and Supply Chain
- > Ensure all State Medical Assistance activity
 - > Identifies and reports Modern Slavery Risks
 - > Takes active steps to proactively address Modern Slavery Risks

2. Scope of Policy

This policy covers all State Medical Assistance activities including, but not limited to:

- > Design and Delivery of Operations and Services
- > Supplier and Sub Contractor Relationship Management
- > Corporate Activity

3. Definitions

Modern Slavery Act 2018 (Cth)¹ being the Commonwealth legislation (the Act) enacted by the Parliament of Australia on 29 November 2018 (and may be amended from time to time).

Modern slavery for the purposes of this policy is defined as including eight types of serious exploitation and outlined in Section 4.

Operations is defined as activity undertaken by State Medical Assistance.

Partnership means all relationships between SMA and a Partner whereby SMA grants the Partner the possibility of using its name, emblem/logo or image in its communication and promotional materials, thereby potentially creating a public association of image between the Partner and SMA. This relationship includes arrangements of; sponsorships, cause-related marketing initiatives, and strategic alliances.

Risks of modern slavery practices means the potential for SMA to cause, contribute to, or be directly linked to modern slavery through its supply chains and operations.

State Medical Assistance (SMA) refers to State Medical Assistance Pty Ltd and any related companies.

State Medical Assistance employees include any current:

- Members of a Governance Body (members of the SMA Board, or its Sub-Committees)
- Volunteers;
- Employees;
- Owners; and
- Contractors

Suppliers is defined as any organisation or person who provides SMA with goods or services, including their subcontractors, agents, related entities and consultants.

Supply chains is defined as the products and services (including labour) that contribute to SMA's own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.

4. What is Modern Slavery

Modern slavery is defined by the *Modern Slavery Act (Cth) 2018*¹ to include eight types of serious exploitation and which can be understood as:

- **Trafficking in persons**, which is the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;
- **Slavery**, which is where the offender exercises powers of ownership over the victim;
- **Servitude** which is where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work;
- **Forced labour**, which is where the victim is either not free to stop working or not free to leave their place of work;
- **Forced marriage**, which is where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony;
- **Debt bondage**, which is where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined;
- **The worst forms of child labour**, which involves situations where children are: exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs; and
- **Deceptive recruiting for labour or services** which is where the victim is deceived about whether they will be exploited through a type of modern slavery².

It can also extend to:

- Entering into a commercial transaction involving a slave;
- Exercising control or direction over, or providing finance for, any commercial transaction involving a slave or act of slave trading;
- Conducting a business involving servitude or forced labour (including exercising control over the business or providing finance to it)

5. State Medical Assistance approach to limiting the risk of modern slavery practices

SMA will work proactively to reduce modern slavery within our supply chains and operations and we expect all organisations we engage with to do the same.

5.1 Supply Chain

SMA Supplier Code of Conduct

We expect all existing and new Suppliers to comply with the principles set out in our Supplier Code of Conduct. Fundamental to the Supplier Code of Conduct is an expectation that all Suppliers operate in full compliance with the laws and regulations in the jurisdiction where the goods are sourced, procured or services are performed.

Suppliers must use best endeavours to ensure that there is no modern slavery in their supply chains and operations. In the event Suppliers identify any occurrence of, or material risk of modern slavery in their supply chains or operations they are to take practical and effective steps to address that occurrence or risk. Suppliers must notify SMA as soon as practicable of any occurrence of, or material risk of modern slavery they have identified and notify relevant authorities where appropriate.

SMAs' contractual terms

Our contractual terms reflect Supplier obligations outlined in the Supplier Code of Conduct, including compliance with Australian modern slavery laws and those foreign modern slavery laws that apply in the location(s) in which they operate.

Supply chain mapping and risk assessment

We encourage our suppliers to complete a Corporate Social Responsibility questionnaire which contains questions relevant to modern slavery. Answers to this questionnaire will provide us with a greater understanding of the risk of modern slavery within a supplier's supply chains or operations and enable us to work with a supplier to reduce the risks identified. We will actively and progressively improve our understanding and oversight of all tiers of our supply chains.

5.2 Operations

Modern Slavery Policy

SMA maintains a Modern Slavery Policy (this Policy) outlining our approach to reducing the risk of modern slavery practices within our supply chains and operations. The Policy provides guidance on the steps SMA takes to work with suppliers to reduce risks and the range of supports available for when an SMA employee becomes aware that someone is at risk of or affected by modern slavery practices.

Incorporating modern slavery into other policies

When existing policies undergo policy review or new policies are under development, policy owners are required to identify existing modern slavery commitments that can be enhanced, or where modern slavery protections can be incorporated.

Ethical Investments

The investment of SMA funds must be consistent with the principles of SMA. As such, no investment should knowingly be made in companies who engage in activities or services which could be directly viewed as considerably compromising these principles.

Human Resources

We are committed to ensuring the health, safety and wellbeing of our workforce and we maintain a suite of policies that are informed by and compliant with Australian workplace and occupational health and safety law. We ensure that our volunteers are engaged on a truly voluntary and non-exploitative basis.

Partnership Screening

Prospective partners automatically disqualify from public association with SMA if they are knowingly or deliberately engaged in activities running counter to:

- > SMAs' principles;
- > Principles of International Humanitarian Law;
- > Internationally recognised standards of human rights, labour rights and protection of health; and/or

- Are involved in the manufacture or sale of arms, ammunition, tobacco or pornography.

Authorities

1. Provides delegated authority, as required, to initiate independent investigations instigated by the owner of this policy into alleged or observed occurrences of Modern Slavery.
2. Enables the owner of this policy to inform State Medical Assistance clients of any breaches of the Modern Slavery Act (2018 Cmth) found within the State Medical Assistance supply chain.

5.3 Communications, Engagement and Training

SMA employees will be provided communications and training opportunities to enhance their understanding of the causes and humanitarian impact of modern slavery, the Modern Slavery Policy and our approach to limiting the risk of modern slavery within our supply chains and operations.

SMA employees with high purchasing responsibilities are provided additional training on the SMA Supplier Code of Conduct, SMA contractual terms, and supporting suppliers to undertake due diligence.

SMA employees who initiate and/or periodically review relationships with third parties are provided with training to apply the central and whole of organisation due diligence tool and processes.

5.4 Continuous improvement approach to reducing the risk of modern slavery

We are committed to applying a continuous improvement approach to how we reduce the risk of modern slavery practices within our supply chains and operations.

We will seek feedback from SMA employees, Suppliers, Partners and other parties in regard to the success or otherwise of the actions we have taken to reduce the risk of modern slavery.

6. Reporting Concerns of modern slavery

6.1 Reporting unethical or unlawful conduct

A key part of supporting ethical standards is enabling people (including Suppliers and Partners) to feel free and safe to speak up when there are reasonable grounds to suspect that SMA or its employees are not acting ethically or in accordance with laws and obligations.

Concerns about compliance or ethical issues or illegal or unethical activities are to be reported to the owner of this policy.

Reports of unethical or unlawful conduct are responded to in accordance with SMA's Whistle-blower Policy.

6.2 Responding to concerns of modern slavery practices

The often hidden nature of modern slavery practices means it can be difficult to identify and can be difficult for people to report. It is important to respond in a way that is safe, ethical and respects the dignity and rights of the person at risk or affected by modern slavery practices.

There are a range of supports available for when an SMA employee becomes aware that someone is at risk of or affected by modern slavery practices, regardless of if this occurs within SMA supply chains and operations or in the broader community.

In Australia, the Australian Federal Police is responsible for investigating suspected cases of modern slavery and can be contacted on 131 237 to discuss or report a suspected case. Contact can be made anonymously.



In an emergency and if someone is in immediate danger, please call Triple Zero (000) for police assistance.

References

¹ Modern Slavery Act (Cth) 2018.

Available from: <https://www.legislation.gov.au/Details/C2018A00153>

² Department of Home Affairs. *Commonwealth Modern Slavery Act 2018: Guidance for reporting entities (2018)*. Available from <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf>