

St Vincent's Health Australia (SVHA) Group Policy

Policy Title:	Supplier Code of Conduct
TRIM Number:	D/2026/32554
Version:	V1.0
Portfolio:	Operations and Supply Chain
Keywords	Modern Slavery, Labour Standards, Environment Standards, Ethical Standards
Policy Applicable to	Direct and indirect suppliers, contractors, consultants, service providers, external partners and third parties to St. Vincent's Health Australia, all St. Vincent's Health Australia subsidiaries and joint ventures.
Status	Current
Review Officer/Author(s):	SVHA General Manager Procurement in consultation with Group Buyers, SVHA Group Environment Social Governance Lead, Group Procurement Specialist-Environment Social Governance, SVHA Group General Counsel, General Manager Enterprise Risk Management, National Director Legal & Risk
First Introduced:	June 2026
Summary of changes:	New Document
Next Review Date:	June 2029
Approval by:	SVHA Board
Approved Date:	18 June 2026

All SVHA policies must comply with the Code of Ethical Standards for Catholic Health and Aged Care Services in Australia, the Ethical Framework for Mary Aikenhead Ministries and the SVHA Ethics Policy.

Version	Date Approved
V1.0	27 May 2026 by SVHA MEA Committee 18 June 2026 by SVHA Board

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Purpose

SVHA procures goods and services from diverse suppliers who deliver quality products, services and value while adhering to our environmental, social, and governance (ESG) principles.

SVHA is committed to protecting the rights of employees, partners, and individuals within our supply and value chains. Our suppliers, contractors, consultants, and partners must follow the Supplier Code of Conduct (Code) and comply with all applicable laws. SVHA selects suppliers who demonstrate respect for ESG principles and meet Code requirements.

This Code aligns with the UN Guiding Principles on Business and Human Rights, the ILO Fundamental Principles and Rights at Work, the Australian Modern Slavery Act (2018), and standards for social, environmental responsibility, and anti-corruption.

Application of this Code

This Code outlines SVHA's expectations of suppliers, their entities, employees, subcontractors, and third parties concerning labour rights, workplace safety, environmental protection, and ethical practices. SVHA expects Suppliers to communicate this Code to all relevant parties in their local language. Suppliers should encourage their own suppliers to meet these principles or equivalent standards. SVHA will assess compliance with this Code, investigating violations through internal or independent review. SVHA may take appropriate action, where violations occur and there is no commitment to address non-compliance within reasonable time. Such action may lead to remediation, suspension, or transitioning to alternative suppliers, where feasible, depending on the risk severity and availability of alternatives.

Standards expected of Suppliers

Suppliers are expected to align with our **social, ethical, environmental and corporate governance standards**, all else being equal. We outline the minimum standards expected from our suppliers and contractors below.

Social Standards

1. Labour Standards

No forced or bonded labour

No forced or bonded labour. Work must be freely chosen without threat or abuse. Workers shall not be forced to work to repay debt and must be free to leave employment. This includes not restricting workers' identity papers, holding deposits, or limiting movement.

No child labour (as legally prohibited by local laws)

No workers under the local legal minimum age are permitted. Young workers must not engage in dangerous or harmful work. Work should not interfere with schooling or their ability to benefit from it.

No worker should pay for a job

No worker should pay for a job; SVHA prohibits charging employees recruitment fees. Costs associated with recruitment and employment, including migration costs, must be paid by employers.

Fair pay

Suppliers must pay workers a living wage in accordance with relevant agreements and local laws, including minimum wage, leave entitlements, and benefits.

Subcontractor payment terms

SVHA expects suppliers to offer fair payment terms to subcontractors, similar to those provided by SVHA. Suppliers must process all legitimate payment claims promptly and maintain an accessible subcontractor register.

Working hours

Workers should not face excessive hours. Normal working hours must follow local laws, with overtime requiring adequate breaks and compensation.

Freedom of association

Suppliers must respect workers' rights to form unions, bargain collectively, engage in peaceful assembly, and refrain from such activities.

Safely raise grievances

- a. Workers should be able to raise concerns through accessible, confidential, and anonymous reporting mechanisms that protect them from reprisal. The supplier must establish processes for investigating and addressing worker concerns.
- b. Safe and secure working and living conditions
A safe, secure, and hygienic working environment shall be provided for the relevant industry. Steps should be taken to prevent accidents and injuries by minimising hazards within the working environment. Worker accommodation must also be safe, secure, and hygienic.

2. Modern Slavery - As per the Modern Slavery Act 2018 (Cth)

Upon request, provide SVHA information regarding:

- i. Steps to identify Modern Slavery risks in operations and supply chains.
- ii. Processes for addressing Modern Slavery practices.
- iii. Training content and timing for employees, contractors, and suppliers.
- iv. Processes for handling complaints consistent with this Code.

If Modern Slavery Practices are found in operations or supply chains, you must:

- i. Take action to address these practices, including in supply chains.
- ii. Take steps to remediate impacts, prioritising victim welfare per UN Guiding Principles.
- iii. Promptly disclose the incident and response to SVHA.

3. Inclusive culture with no discrimination

SVHA maintains a zero-tolerance policy regarding discrimination within its workforce. Suppliers must:

- a. Provide a workplace free of discrimination, harassment, and bullying, supported by anti-discrimination and equal opportunity policies for employees, suppliers, and subcontractors.

- b. Ensure no discrimination occurs in hiring, compensation, training, promotion, termination, or retirement based on race, caste, origin, religion, age, disability, gender, pregnancy, marital status, sexual orientation, union membership, or political affiliation. Employment should be awarded on merit and based on job requirements.

4. Anti-harassment and abuse

SVHA expects suppliers to maintain an environment that treats employees with dignity and respect, without threats of violence, exploitation, or verbal or psychological harassment. Furthermore, harsh treatment or corporal punishment is not tolerated. SVHA expects suppliers to support internationally proclaimed human rights and avoid complicity in human rights abuses.

Ethical Standards

1. Anti-corruption and anti-bribery

SVHA expects suppliers to maintain the highest ethical standards, respect local laws, and refrain from corrupt practices, including extortion, fraud, or bribery. SVHA does not tolerate corruption, fraud, or bribery, which may be illegal under local law.

2. Conflict of interest

Suppliers must conduct business with impartiality and manage any conflicts of interest.

Suppliers must:

- a. Declare to the purchasing department or Group Procurement Manager (or facility manager under contract, or primary contact for goods, services or construction works), any actual, potential or perceived conflict of interest related to SVHA dealings; and
- b. Avoid relationships which may compromise their duties under their SVHA business arrangement. SVHA employees must avoid actual, perceived and potential conflicts of interest where possible. Unavoidable conflicts must be declared and managed appropriately.

3. Gifts, benefits and hospitality

Supplier staff and contractors must conduct themselves with integrity, impartiality, and accountability, performing duties without favouritism or personal gain. Suppliers shall not offer SVHA personnel gifts or benefits, directly or indirectly. Hospitality should be limited to basic courtesy offers during meetings. Suppliers must not take actions to obtain an unfair advantage.

4. Intellectual property

Intellectual property rights must be respected, with technology transfer ensuring the protection of these rights, and customer and supplier information safeguarded.

5. Data and privacy

- a. Business dealings must be transparent and accurately recorded in business books according to established standards. Information pertaining to labour, safety, environmental practices, business activities, structure, and performance must be disclosed in accordance with applicable laws and industry practices. Record falsification is unacceptable.
- b. Personal information of partners, suppliers, customers, and employees must be protected in accordance with applicable laws and industry practices.

Environmental Standards

Alignment with SVHA Strategy

Suppliers are expected to support SVHA's strategic commitment to environmental stewardship as part of the Strategy 2030 and the organisation's environmental sustainability and climate resilience agenda. Suppliers should contribute to:

- Reducing the environmental footprint of healthcare delivery
- Supporting net zero emissions pathways
- Improving resource efficiency and circularity
- Strengthening climate resilience across the health and aged care system
- Protecting community health through responsible environmental practices

1. Environmental Compliance

Suppliers must:

- a. Comply with all applicable environmental legislation, regulations and permits in jurisdictions where they operate.
- b. Maintain appropriate environmental management processes to monitor and manage compliance.
- c. Promptly notify SVHA of any significant environmental incidents, regulatory breaches or enforcement actions that may affect service delivery or organisational reputation.

2. Climate Action and Emissions Reduction:

Healthcare supply chains are a major contributor to sector emissions. SVHA therefore expects suppliers to support climate action by:

- a. Measuring and managing greenhouse gas emissions where practicable.
- b. Identifying and implementing opportunities to reduce carbon emissions associated with products, services and logistics.
- c. Supporting decarbonisation by reducing Scope 1, 2 and relevant Scope 3 emissions.
- d. Providing emissions or environmental data where requested to support organisational sustainability reporting.

3. Resource Efficiency and Circular Economy

Suppliers are expected to minimise environmental impact by improving the efficient use of natural resources and supporting circular economy principles.

This includes:

- a. Reducing consumption of energy, water and raw materials
- b. Designing products and services that minimise environmental impact across their lifecycle
- c. Supporting reuse, refurbishment and recycling where appropriate
- d. Implementing environmentally responsible logistics and distribution practices

4. Waste and Hazardous Materials Management

Suppliers must ensure responsible management of waste generated through their operations and supplied products. This includes:

- a. Minimising waste generation across production and supply processes

- b. Ensuring safe handling, transport and disposal of hazardous, chemical and regulated waste
- c. Supporting healthcare waste reduction initiatives where relevant
- d. Complying with all applicable healthcare, environmental and biohazard waste regulations

5. Sustainable Products and Packaging

Suppliers are encouraged to support sustainable procurement outcomes by:

- a. Providing products that demonstrate reduced environmental impact across their lifecycle
- b. Minimising unnecessary packaging
- c. Using recyclable, reusable or sustainably sourced materials
- d. Avoiding environmentally harmful or restricted substances where safer alternatives are available

Where possible, suppliers should support initiatives to reduce single-use materials and increase product sustainability.

6. Deforestation, Pollution Prevention and Conservation of Natural Resources

SVHA expects suppliers to actively protect natural ecosystems and minimise environmental harm across their operations and supply chains.

Suppliers should:

- **Prevent Deforestation and Protect Biodiversity**
 - a. Ensure that products and raw materials are not sourced from operations that contribute to illegal deforestation, habitat destruction or biodiversity loss.
 - b. Where relevant (e.g., timber, paper, palm oil, rubber or agricultural products), prioritise certified sustainable sources.
 - c. Implement responsible land management practices that protect ecosystems, waterways and wildlife habitats.
- **Prevent Pollution**
 - a. Implement effective measures to prevent air, water and soil pollution arising from manufacturing, processing, transport or waste disposal activities.
 - b. Ensure appropriate management of chemicals, hazardous substances and emissions in accordance with environmental regulations and recognised best practice.
 - c. Maintain controls to prevent spillages, contamination and environmental incidents that may impact communities or ecosystems.
- **Conserve Natural Resources**
 - a. Use natural resources responsibly by improving the efficiency of energy, water, land and raw material consumption.
 - b. Implement initiatives to reduce resource use and environmental footprint across product lifecycles.
 - c. Support sustainable resource management and circular economy practices, including reuse, recycling and material recovery where feasible.

Suppliers are encouraged to demonstrate continuous improvement in environmental stewardship and support SVHA's broader commitment to environmental sustainability and climate resilience.

7. Environmental Management Systems

Suppliers are encouraged to implement robust environmental governance and management systems, such as:

- a. An Environmental Management System (EMS) aligned with ISO 14001 or equivalent

- b. Environmental policies and operational controls
- c. Environmental risk management and monitoring
- d. Workforce education and accountability for environmental performance

8. Transparency, Reporting and Collaboration

SVHA may request suppliers to provide environmental performance information to support sustainability reporting, procurement evaluation and climate disclosures.

Suppliers may be asked to provide:

- Greenhouse gas emissions data
- Energy or resource use information
- Waste and recycling performance metrics
- Environmental certifications or product lifecycle information

SVHA values collaborative partnerships with suppliers who are committed to continuous environmental improvement and innovation.

Corporate Governance

The SVHA Group Procurement function is responsible for implementation, monitoring and enforcement of this Code. Suppliers may be required to formally acknowledge and agree to this Code as part of onboarding and contract terms.

Robust management systems and risk controls are essential for SVHA's reliable supply chain. Suppliers must maintain sound administration processes. Suppliers are expected to assist SVHA in reviewing compliance with the Code. SVHA may request suppliers to provide evidence of Code compliance, including supporting documentation and records.

1. Risk assessment and management

Suppliers must maintain effective administrative processes and develop procedures to identify and manage operational risks, encompassing supply chain issues, labour rights, safety, environmental considerations, ethical practices, and governance.

2. Critical incident management

Suppliers must identify and manage critical incidents, emergencies and business continuity risks and report to SVHA of such incidents in a timely manner.

3. Audits and assessments

SVHA reserves the right to conduct audits, request supporting documentation to ensure compliance, suppliers must:

- a. Take reasonable steps to perform periodic evaluations of their facilities and operations, including subcontractors to ensure they comply with equivalent standards.
- b. Cooperate fully with any SVHA audit, review or mutually agreed corrective action detailed below.

4. Supplier Management Platform

SVHA employs the LinkSafe platform to manage supplier compliance, insurance, and accreditation. Suppliers must comply with all requested information and ensure it remains up-to-date.

Corrective action process

- Suppliers are required to inform their primary contact, such as the Group Procurement contact or the Facility Manager, about any identified or suspected issues related to the SVHA's social, ethical, environmental, and corporate governance standards concerning the goods, services, or construction works they provide.
- This notification must be submitted within 30 days of identifying the concern.
- The SVHA team will evaluate the incident and collaborate with the supplier to determine the next steps, including developing a remediation plan to address the issue.
- Throughout this process, a survivor-centric approach based on trauma-informed principles should be employed to minimise the risk of triggering or re-traumatising victim-survivors.
- If suppliers are uncertain about this approach, they should contact the SVHA team for guidance.
- Non-compliance with these requirements may lead to SVHA taking adverse actions, including reassessing the contractual relationship with the supplier.

Reporting misconduct, unethical behaviour or suspected corruption

If a supplier believes another supplier, contractor, or staff member has breached this Code, or that an SVHA employee has breached their Code of Conduct, they should report concerns to the following:

a. For supplier issues

Contact the Group Manager, Procurement:

Renee Hodge, Email: renee.hodge@svha.org.au

b. For SVHA staff misconduct

Contact the National Director Legal & Risk, SVHA Group Legal & Governance:

Renee Thomlinson, Email: renee.thomlinson@svha.org.au

c. External Whistleblower Hotline

A Discloser who does not feel comfortable making a report via the above channels, or where this would not be appropriate for any reason (including because the SVHA Principal Officer are involved in the concern) may make a report through the KPMG FairCall Whistleblowing Hotline. The service allows for anonymous reporting and is available 24 hours a day. Reports to the KPMG FairCall Whistleblowing Hotline are secure and confidential.

Reports may be made to this service using the following methods:

Telephone	1800 500 965
Email	faircall@kpmg.com.au
Post	Addressed to "The FairCall Manager KPMG Forensic PO Box H67 Australia Square Sydney NSW 1213"
Facsimile	+61 2 9335 7466

SVHA does not tolerate improper conduct or reprisals against those who disclose misconduct. While reporting concerns is encouraged, it must be done fairly and respectfully. Reports made in good faith will not result in disadvantage, even if the reported conduct is later found not to breach the Code.

Related Policies/Procedures/Guidelines

This policy is aligned with other SVHA policies that support the identification, treatment and referral of vulnerable patients, clients or residents who present to our facilities for care. It also supports policies that protect staff, suppliers or contractors when speaking up about concerns in the workplace, raise awareness and advocacy of issues to support fair and ethical practices in workplace. These include, but are not limited to:

- SVHA Ethics Policy
- SVHA Code of Conduct
- SVHA Employee Code of Conduct
- Whistle Blower Policy
- SVHA Modern Slavery Policy
- SVHA Group Procurement Policy
- Standard Terms and Conditions for the Supply of General Goods and Services
- Right to Work Approval & Visa Compliance Policy and Procedure
- Supplier Due Diligence Program

Legal and compliance considerations:

- The Corporations Act 2001 (Cth)
- Public Interest Disclosures Act 2012 (VIC)
- ASIC Regulatory Guide 270: Whistleblower policies
- AS 8001 Fraud and Corruption Control
- AS 8004 Whistleblower Protection Programs for Entities
- Modern Slavery Act 2018 (Cth)