



# Ethical Sourcing Policy

## Introduction

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Calvary is committed to developing a culture which affirms life and healing, a culture which promotes the common good through just and compassionate health, aged, disability and community services.

Consistent with our values of hospitality, healing, stewardship and respect, Calvary is also committed to upholding human rights, not only with respect to its own employees but also for workers in its supply chain. Our Ethical Sourcing Policy (Policy) encompasses comprehensive criteria on anti-corruption, labour rights, fair and safe working conditions and environmental compliance.

We are committed to building a culture in which diversity is valued and to provide a workplace that is free from discrimination, harassment and bullying. Our Policy embraces and enacts UN Universal Declaration of Human Rights labour standards, standards relating to the environment and anti-corruption. Our Policy respects and incorporates all relevant conventions of the [International Labour Organisation \(ILO\)](#) and the principles of the [United Nations' Universal Declaration of Human Rights](#). Our policy is also cognizant of the requirements set out in the [Modern Slavery Act 2018 \(Commonwealth\)](#) and State legislation.

Calvary expects all our suppliers to respect and comply with the requirements set out in this Policy and we will continue to work with and support those suppliers who demonstrate continual improvement. We encourage our suppliers to be open and honest about the challenges they face so together we can find practical solutions.

This Policy applies to all Calvary Health Care suppliers no matter where they operate in the world and it is complemented by a compliance audit program based on the risk rating of the country of origin.

Our Policy aims to communicate a clear set of requirements for our suppliers and work with them to:

- improve working conditions for workers in our supply chain,
- protect our corporate reputation and the trust in our brand by doing the right thing,
- demonstrate both the [Spirit of Calvary](#), respect and good stewardship.

## Policy

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### Compliance with International Labour Standards and National Legislation

This Policy sets our minimum requirements. We are committed to working with our suppliers to implement improvement plans and together achieve compliance. Suppliers to Calvary are expected to implement and maintain systems to achieve compliance with this Policy as well as national laws.

In particular, suppliers must be cognizant of and compliant with the following international agreements, as amended and in force for Australia from time to time:

- (a) the International Convention to Suppress the Slave Trade and Slavery, done at Geneva on 25 September 1926 ([1927] ATS 11);
- (b) the ILO Convention (No. 29) concerning Forced or Compulsory Labour, done at Geneva on 28 June 1930 ([1933] ATS 21);
- (c) the Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices similar to Slavery, done at Geneva on 7 September 1956 ([1958] ATS 3);
- (d) the International Covenant on Civil and Political Rights, done at New York on 16 December 1966 ([1980] ATS 23);
- (e) the Convention on the Elimination of All Forms of Discrimination Against Women, done at New York on 18 December 1979 ([1983] ATS 9);
- (f) the Convention on the Rights of the Child, done at New York on 20 November 1989 ([1991] ATS 4);
- (g) the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27);
- (h) the Optional Protocol to the Convention on the Rights of the Child on the Sale of Children, Child Prostitution and Child Pornography, done at New York on 25 May 2000 ([2007] ATS 6);
- (i) the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

Where the provisions of the law and this Policy address the same subject, whichever affords greater protection applies.

Suppliers should communicate this Policy to their own suppliers and where reasonably practicable, extend the principles of this Policy through their supply chain.

## Ethical Sourcing Criteria

<p><b>Bribery and Corruption</b></p>	<ul style="list-style-type: none"> <li>• Bribes, favours, benefits or other similar unlawful or improper payments, in cash or in kind, are strictly prohibited.</li> <li>• This is regardless of whether given to obtain business or otherwise.</li> <li>• Suppliers shall provide transparent documents and records.</li> </ul>
<p><b>Labour Rights</b></p>	<ul style="list-style-type: none"> <li>• Employment is freely chosen. The use of forced, bonded or involuntary prison labour is prohibited.</li> <li>• Workers are not permitted or encouraged to incur debt through recruitment fees, fines or other means.</li> <li>• Workers are not required to lodge deposits or their identity papers with their employer and are free to leave their employer after reasonable notice.</li> <li>• Workers are free to leave the workplace after their shift.</li> </ul>
<p><b>Freedom of Association</b></p>	<ul style="list-style-type: none"> <li>• Workers, without distinction, have the right to join or form trade unions of their own choosing and to collectively bargain, without prior authorisation from suppliers' management.</li> <li>• The employer adopts an open attitude towards the activities of trade unions and their organisational activities and does not interfere with or prevent such legitimate activities.</li> <li>• Workers' representatives of trade union members are not discriminated against or penalized. Suppliers shall give workers representatives access to the workplace to carry out their representative functions in the workplace.</li> <li>• Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.</li> </ul>
<p><b>Working Conditions, Health &amp; Safety</b></p>	<ul style="list-style-type: none"> <li>• A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health in the working environment.</li> <li>• Suppliers shall provide adequate safeguards against fire and shall ensure strength, stability and safety of buildings and equipment (including residential accommodation where provided).</li> <li>• Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.</li> <li>• Access to clean toilet facilities and to clean and drinkable water and, if relevant, sanitary facilities for food preparation and storage shall be provided.</li> <li>• Accommodation, where provided shall be clean, safe, and meet the basic needs of the workers.</li> <li>• Suppliers shall ensure that personal protective equipment is available and workers are trained in its use. Safeguards on machinery must meet or exceed local laws.</li> </ul>

<p><b>Human Trafficking</b></p>	<ul style="list-style-type: none"> <li>• Calvary does not practice, condone, or knowingly source from suppliers involved in slave trade/ human trafficking, the exploitation and 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.</li> <li>• Suppliers shall show that they are committed to respecting and supporting the following globally recognised declarations, principles and goals: <ul style="list-style-type: none"> <li>○ <a href="#">Universal Declaration of Human Rights</a></li> <li>○ United Nations Guiding Principles on Business and Human Rights</li> <li>○ <a href="#">The Ten Principles of the UN Global Compact</a></li> <li>○ <a href="#">International Labour Organization’s Declaration on Fundamental Principles and Rights at Work</a></li> <li>○ United Nations Women’s Empowerment Principles</li> <li>○ United Nations Sustainable Development Goals</li> <li>○ <a href="#">Rio Declaration on Environment and Development</a> and</li> <li>○ <a href="#">United Nations Convention against Corruption</a>.</li> </ul> </li> </ul>
<p><b>No Child Labour</b></p>	<ul style="list-style-type: none"> <li>• Use of <b>child labour</b> is strictly prohibited.</li> <li>• Suppliers shall comply with the national minimum age for employment or the age of completion of compulsory education and shall not employ any person under the age of 15, whichever of these is the higher standard.</li> <li>• Young workers must not be employed in conditions which compromise their health, safety or moral integrity, and/or which harm their physical, mental, spiritual, moral or social development. The term “<b>child labour</b>” is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.</li> </ul>
<p><b>Living Wages</b></p>	<ul style="list-style-type: none"> <li>• Wages and benefits paid for a standard working week shall meet or exceed, national legal standards or industry benchmark standards, whichever standard is higher. In any event, wages should always be enough to meet basic needs and to provide some discretionary income. All workers shall be 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.</li> <li>• Deductions from wages as a disciplinary measure or any deductions from wages not provided for by Law shall not occur without the expressed permission of the worker concerned.</li> </ul>

<p><b>Working Hours</b></p>	<ul style="list-style-type: none"> <li>• Working hours comply with any Law and benchmark industry standards, whichever affords greater protection to ensure the health, safety and welfare of workers.</li> <li>• In any event, workers shall not on a regular basis be required to work in excess of 48 hours (excluding overtime) per week and shall be provided with at least one day off for every 7 day period on average.</li> <li>• Suppliers shall respect all worker’s rights to breaks during work shifts.</li> <li>• Suppliers shall comply with national/local laws for workers’ entitlements to public and annual holidays.</li> </ul>
<p><b>Discrimination</b></p>	<ul style="list-style-type: none"> <li>• There is no discrimination in hiring, compensation, access to training, pay, benefits, promotion, discipline, termination or retirement based on race, caste, social background, disease, ethnic and national origin, religion, age, disability, gender, pregnancy, marital status, sexual orientation, union membership or political affiliation.</li> <li>• Terms and conditions of employment shall be based on an individual’s ability to do the job, not their personal characteristics or beliefs.</li> <li>• Suppliers shall treat all workers with respect and dignity.</li> </ul>
<p><b>Harsh or Inhumane Treatment</b></p>	<ul style="list-style-type: none"> <li>• Workers shall be treated with dignity and respect.</li> <li>• Suppliers will provide a workplace free from harassment including physical, sexual, verbal or visual behaviour that creates an offensive, hostile or intimidating environment.</li> </ul>
<p><b>Environmental Compliance</b></p>	<ul style="list-style-type: none"> <li>• The facility shall comply with national and local environmental laws and regulations.</li> <li>• The facility shall dispose of its production waste in accordance with local environmental laws and regulations.</li> <li>• The facility must have identified and documented its key environmental impacts and implemented controls to eliminate or minimise its impact on the environment with respect to solid waste disposal, hazardous chemicals storage and management, air and water emissions.</li> </ul>

## Assessment & Review

Calvary will work closely with suppliers to ensure they are aligned with this Policy.

Calvary requires each supplier which has its own supply chain to be able to provide Calvary with the following information:

- (a) A description of their structure, operations and supply chains; and
- (b) A description of their risks of modern slavery practices in their operations and supply chains any entities that the supplier owns or controls; and

- (c) A description of the actions taken by the supplier and any entity that the supplier owns or controls, to assess and address these risks, including due diligence and remediation processes; and
- (d) A description of how the supplier assesses the effectiveness of such actions; and
- (e) A description of the process of consultation with any entities that the supplier owns or controls; and
- (f) Any other information that the supplier considers relevant.

Calvary carries out regular assessments of the practices of its suppliers, including self-assessment by suppliers of their operations. In addition Calvary may conduct site visits to suppliers to carry out in depth reviews with the objective to work with our suppliers to identify best practice and support improvement.