

## 1. INTRODUCTION

Karingal St Laurence Limited (KSL) is committed to ethical, sustainable, and socially responsible procurement and we expect our suppliers to hold the same level of commitment. KSL considers that our suppliers are its strategic partners in delivering the care and services that KSL provides.

This Supplier Code of Conduct (**SCoC**) describes the obligations of suppliers engaged by KSL relating to integrity, ethics and conduct; conflicts of interest, gifts, benefits and hospitality; confidentiality and privacy; information security; corporate governance; labour and human rights; health and safety; and environmental management. KSL expects all suppliers to be aware of their obligations under the SCoC and ensure that areas of their business and supply chain meet the standards of the SCoC.

## 2. PURPOSE OF SUPPLIER CODE OF CONDUCT

The purpose of the SCoC is to ensure that KSL's purchases of goods and services has a positive impact on society and the environment.

## 3. SCOPE

This SCoC applies to:

- all suppliers to KSL and its subsidiaries and related entities (the KSL Group); and
- all types of services or goods provided to the KSL Group by a supplier, including but not limited to goods or services provided under:
  - formal, written contracts;
  - informal agreements; and
  - purchase orders.

The requirements under this SCoC are in addition to a supplier's other legislative or contractual obligations.

## 4. POLICY

KSL expects suppliers to embody attitudes, values and behaviours that are consistent with KSL's Values, Mission and Vision, which are all underpinned by our core belief that we should be 'All Safe, All the Time'.

### 4.1. Integrity, ethics and conduct

Suppliers will exhibit high standards of ethical conduct and compliance with all applicable laws. Suppliers are expected to be ethical in their business activities, including relationships, practices, sourcing and operations.

#### 4.2. Business integrity

Suppliers will comply with all anti-bribery, anti-corruption, anti-money laundering, and modern slavery laws. Suppliers must not engage in, either directly or indirectly, fraudulent, corrupt, exploitative or collusive activities.

Suppliers will take all reasonable steps to prevent, report and respond to concerns relating to ethical issues, abuse and neglect, misconduct, unacceptable behaviours, family or domestic violence, Work Health & Safety (WHS) concerns, criminal activity and breach of the SCoC.

#### 4.3. Record keeping and documentation

Suppliers will maintain records that accurately document all financial transactions and information regarding their business activities, labour, health and safety and environmental practices in accordance with applicable laws, policies and procedures.

#### 4.4. Professional conduct

Suppliers will conduct themselves in a manner that is fair, professional and that will not bring KSL into disrepute.

Suppliers and their staff will develop, foster and maintain respectful relationships with clients, workers and others that they come into contact with while delivering services or goods to KSL.

Suppliers will ensure professional boundaries with clients and workers are maintained at all times during their engagement with KSL.

Suppliers will support KSL practices and policies designed to promote equality, respect and non-violence.

#### 4.5. Confidentiality and Privacy

Suppliers will comply with relevant Commonwealth, State and Territory privacy laws in protecting the confidentiality of business, commercially sensitive and/or client/worker personal information gathered during the course of providing goods or services to KSL.

Suppliers will keep confidential and not divulge either directly or indirectly to any person any information relating to the business, processes, systems or affairs of KSL which is of a confidential or private nature or which is not otherwise in the public domain, except where the disclosure is required by law or may reasonably be required for the purpose of enabling the parties to fulfil their respective obligations under an agreement.

Suppliers will ensure that the personal details of KSL clients or workers are not shared (whether verbally, in writing or electronically) without consent from both the individual and a member of KSL's senior leadership team or unless required to do so by law.

Suppliers will ensure that their staff do not share images, information or details about KSL's clients or workers in any medium (including social media) unless express consent has been provided by both the individual and a member of KSL's senior leadership team.

These obligations remain even after the relationship with KSL ends.

#### 4.6. Information Security

Suppliers will take all necessary and reasonable steps to prevent unauthorised disclosure of KSL's information. Suppliers will promote their information security compliance responsibilities and maintain responsible information security policies and practices. Suppliers will comply with all applicable laws and regulations relating to information security and cyber security, including any management and reporting obligations.

Suppliers will manage the impact of their operations by:

- including information security awareness as part of worker induction training and on-going training programs; and
- promoting compliance with physical information security requirements such as clear screen and clean desk policies, wearing authorisation IDs, , password protection of devices and information systems, not sharing authorisation IDs and passwords and ensuring all buildings are properly secured (eg all external doors, to staircases and to the outside, are firmly closed).

#### 4.7. Conflicts Of Interest; Gifts, Benefits and Hospitality

Suppliers will conduct all business activities free of inducements, with impartiality and identify, record and manage conflicts of interest.

##### Conflicts of interest

Suppliers will declare to KSL any actual, potential or perceived conflicts of interest that may impact (or could be interpreted as impacting) the delivery of goods or services provided to KSL.

##### Gifts, benefits and hospitality

Appropriately recording and managing offers of inducements (gifts, benefits and hospitality) is critical to earning and sustaining trust. Suppliers are expected to conduct themselves with the highest standards of integrity, impartiality and accountability.

Suppliers must not ask for, accept or provide any inducement, gift or hospitality that may affect or be seen to affect the way KSL's services are provided or in how the supplier's goods or services are delivered. This applies to relationships between the supplier and KSL workers, clients, families of our clients, other affiliates or KSL Directors. Common courtesy and hospitality, such as the provision of refreshments at a meeting, are permitted.

#### 4.8. Corporate governance

Commitment to sound management administration, risk and corrective action systems, are key to a reliable supply chain for KSL. Suppliers are expected to maintain sound administration processes.

Suppliers will develop and maintain a process to identify, manage and control risks associated with their operations. These include supply chain risks and risks relating to labour and human rights, health and safety, the environment, business ethics, and corporate governance.

Suppliers will:

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- identify and assess potential critical incident, emergency situations and business continuity risks;
  - develop and implement emergency plans and response procedures that minimise harm to life, environment and property;
  - conduct periodic evaluations of their facilities and operations, and the facilities and operations of their subcontractors; and
  - cooperate openly and honestly with any KSL audit, assessment, or review.

#### 4.9. Labour and human rights

Suppliers will support and provide a fair and ethical workplace, which upholds high standards of human rights and integrates appropriate labour and human rights policies and practices into its business operations and supply chains.

Suppliers will:

- comply with the international human rights treaties to which Australia is party. This includes (but is not limited to) complying with the UN Convention on Rights of Persons with Disabilities, UN Convention on the Rights of the Child, UN Resolution on Protection Against Violence and Discrimination Based on Sexual Orientation and Gender Identity and the UN declaration of Human Rights.
- comply with all national and state laws relating to equal employment opportunity, privacy, anti-discrimination and the elimination of modern slavery.
- proactively identify, address and, subject to legal obligations, report on risks of modern slavery practices in their business operations and supply chains.
- support a workplace free from bullying, harassment, victimisation and abuse. Suppliers are expected not to bully or threaten workers, clients or their families with, or subject them to, unlawful or inhumane treatment. This includes, but is not limited to, abuse and harassment which can be verbal, physical, sexual or psychological.
- comply with mandatory reporting and other reporting obligations (as applicable), including contacting a member of KSL's senior leadership team, People & Culture or Legal team and/or the relevant state police authority, if a criminal offence is suspected to have occurred. This may include:
  - allegations of sexual assault;
  - suspected, observed or alleged abuse and neglect of clients and children under the age of 18;
  - deaths; and/or
  - any other criminal offences or allegations.
- comply with their obligations under the *Fair Work Act 2009* (Cth), *Fair Work Regulations 2009* (Cth), contract management practices and any other applicable workplace laws. Suppliers will ensure that those within their supply chain (including third-party recruitment agencies they engage) are also compliant.
- undertake regular audits to determine that the correct wages, loadings, allowances and penalties have been paid to its staff, and will promptly rectify any identified underpayments.

- notify KSL of any compliance action taken by the Fair Work Ombudsman, including but not limited to penalty infringement notices, compliance notices, enforceable undertakings, proactive compliance deeds or court orders arising from non-compliance with the *Fair Work Act 2009* (Cth) or *Fair Work Regulations 2009* (Cth) by the supplier, and any remedial action that the supplier is required to take, has taken or proposes to take as a result of the compliance action or court order.
- commit all necessary resources, financial or otherwise, and meet all necessary expenses to ensure they are able to comply with the SCoC and relevant workplace laws and human rights legislation.

#### 4.10. Health and safety

KSL expects its suppliers to provide a healthy and safe work environment and integrate sound health and safety management practices into its business. Suppliers must comply with all applicable laws and regulations relating to workplace health and safety.

Suppliers are expected to:

- provide a healthy and safe work environment, with comprehensive and effective health and safety management practices in place.
- have a written health and safety policy or equivalent document, and ensure that workers are informed of, and have a good understanding of their responsibilities in relation to this document and health and safety generally.
- have a system to record, monitor and manage health and safety risks and incidents, that is aligned to the organisation's risk profile as well as applicable laws and standards.
- report immediately any accident, incident and near-miss via the organisation's agreed procedures.
- identify and report immediately any workplace hazards and unsafe behaviour or unsafe conditions via the organisation's agreed procedures.
- cooperate with others in seeking appropriate solutions to manage hazards or when suggesting other health and safety improvement.
- provide workers with job-related training to ensure they are equipped with the knowledge and skill to undertake their role safely and without risk to health.
- actively consult and partner with KSL in relation to health and safety matters related to their delivery of services and/or goods.

#### 4.11. Environmental management

Suppliers will actively promote and model environmental responsibility by minimising the environmental impact of their operations and maintaining environmentally responsible policies and practices. Suppliers will comply with all applicable laws and regulations relating to the environment, including any management and reporting obligations.

Suppliers will manage the environmental impact of their operations by:

- ensuring the safe storage, transportation and disposal of hazardous substances;

- promoting and reducing (as much as is practicable) the efficient use of energy, water and natural resource consumption;
- regularly reviewing their business activities to identify and implement mitigations to reduce environmental impacts of their business; and
- promoting the reduction of the risk of pollution, loss of biodiversity, deforestation, damage to ecosystems and greenhouse gas emissions.

#### **4.12. Breaches of the Supplier Code of Conduct**

Any breaches of this SCoC should be reported to KSL’s Procurement Manager or by making an anonymous report by calling KSL’s whistleblower hotline.

Where a breach is substantiated, KSL may require the supplier to undertake remedial action. Depending on the nature and circumstances of the breach, KSL may also decide to terminate the relationship with the supplier.