



Vision Australia

Modern Slavery Statement

March 2021

Position Statement Summary

This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (CTH) by Vision Australia Limited (ACN 108 391 831)

If you would like this position statement in an alternative format or wish to discuss it with Vision Australia's Government Relations and Advocacy team, please contact us:

Vision Australia
Government Relations & Advocacy Team
Tel: 1300 84 74 66 (within Australia)
(+61 2) 9334 3333 (outside Australia)
Email: info@visionaustralia.org
Website: www.visionaustralia.org

About Our Business

Vision Australia is a leading national provider of blindness and low vision services in Australia. Our mission is to support people who are blind or have low vision to live the life they choose. We are a for-purpose organisation and a major participant and partner in the international blindness community.

We support more than 25,000 people of all ages and life stages, and circumstances. We do this through more than 30 Vision Australia centres in Victoria, New South Wales, the Australian Capital Territory, Queensland, South Australia and Western Australia; and through outreach programs in the Northern Territory and Tasmania. We have 833 employees and around 3000 volunteers. Our annual turnover in FY2020 was \$124M. Vision Australia provides the following services: low vision assessment; speech pathology; occupational therapy; physio therapy; psychology; orientation and mobility services; access technology training and assessment; library services; print accessibility; employment services; retail of assistive technology, and Seeing Eye Dogs service.

For more information about Vision Australia, go to:

www.visionaustralia.org

Supply Chain

Vision Australia's supply chain relationships include suppliers from the following sectors: Information, Communication and Technology; Property Services (including Facilities Management, Cleaning, Security); Fleet Management; outsourced Fundraising Services; Print and Promotional Goods and Services; Office Supplies; Corporate Accounting, Legal and Consulting Services; Corporate Clothing; Recruitment Agencies; Veterinary Supplies and off-shore Digital Services. We also procure assistive technology products and low vision aids for sale in our retail division from overseas suppliers and genetic material for our Seeing Eye Dog breeding programs from local and overseas suppliers.

Policy Framework

Vision Australia is committed to operating our business lawfully and ethically and only working with suppliers that are aligned to our values. We expect our suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking and child labour.

Vision Australia has a range of policies and processes which outline our commitment to ethical business practices and compliance with applicable laws. They include:

- Procurement Policy and Procedures
- Retail Purchasing Policy
- Charter of Professional Behaviours
- Fundraising Integrity Policy
- Modern Slavery Policy
- Supplier Code of Conduct

Vision Australia has ensured its Modern Slavery Policy is a publically available document.

Due Diligence Processes

Vision Australia considers the risk of modern slavery to be low within most of our direct business operations. However, Vision Australia recognises the risk of indirect exposure to modern slavery and human trafficking through our supply chain.

As part of the procurement process, Vision Australia seeks to:

- a) Evaluate the supply chain to verify and address the risks of human trafficking or slave labour and to;
- (b) Audit suppliers as necessary to evaluate compliance with standards for slavery and human trafficking in our supply chains.

This means we will review and monitor our supply chain for compliance with the legislation by undertaking appropriate due diligence checks, by obtaining compliance statements from our major or higher risk suppliers, and by engaging in periodic business reviews with selected suppliers to evaluate them and the process that they have in place to comply with this requirement.

All major and high risk suppliers (currently providing or seeking to provide goods or services to Vision Australia) are identified and sent a copy of Vision Australia's Modern Slavery Policy, our Supplier Code of Conduct and asked to complete our Modern Slavery Compliance Questionnaire.

The Modern Slavery Compliance Questionnaire requires all suppliers to confirm that the production and supply of goods and services supplied to Vision Australia and its entities are compliant with the UN Guiding Principles on Business and Human Rights or that all efforts are being made to take action to prevent, mitigate and, where appropriate, remedy modern slavery in the entity's operations and supply chains.

Where suppliers do not complete the questionnaire or demonstrate a lack of compliance with the UN Guiding Principles, Vision Australia will initially work with the supplier to gain compliance and, failing that, will seek alternative suppliers.

Vision Australia acknowledges that the following sectors have greater risk for potential modern slavery, so specific focus has been placed on them as part of this inaugural reporting year: Facilities Management (namely Cleaning Services); Corporate Clothing; Information, Communication & Technology suppliers; and off-shore digital services.

Monitoring & Reporting

In order to monitor and maintain effective records of our modern slavery programme, the relevant business unit will keep records in NetSuite of all evaluations and records to evidence the checks that are undertaken. Any documents provided by a supplier must be sent to the Compliance team to review and file against a supplier's record in

NetSuite. The compliance team will report on the assessment of our supply chain on a quarterly basis to identify the actual numbers of suppliers appointed and assessed and to identify any possible gaps and areas that require further investigation and or audit.

The Modern Slavery Compliance Coordinator must be notified of any suspected slavery or human trafficking, and will promptly and thoroughly investigate any claims or allegations that a supplier is engaging in slave labour activities or human trafficking, or is otherwise not complying with this policy. If necessary the Modern Slavery Compliance Coordinator will escalate their findings to the CEO and the Board, along with the findings of the investigation and the resolution of the claim.

Training

Our policies and statements are available on our intranet and website. Staff are required to familiarise themselves with this policy, our supplier code of conduct and our modern slavery statement. Specific training on eradicating slave labour or human trafficking is available to relevant members of staff. Any queries or questions must be directed to our Modern Slavery Compliance Coordinator.

Grievance & Feedback

Vision Australia has a Whistleblower (Protected Disclosure) Policy that allows (current and former) employees, volunteers and contractors to raise concerns in a confidential manner. Our external provider is FairCall Whistleblower Hotline (1800 500 965). This channel is available for reporting modern slavery concerns. Employees and third parties can also raise concerns through our complaints mechanism:

complaints@visionaustralia.org

This Modern Slavery Statement was approved by the Board of Directors of Vision Australia Limited on 16th December 2020.

Signed on behalf of the Board of Directors of Vision Australia Limited:

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Andrew Moffat

Chair (Vision Australia)