

SCHWARZ

Family Practice

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Ethical Sourcing and Modern Slavery Policy

This Ethical Sourcing and Modern Slavery Policy applies to all Employees of the business.

The objective of the policy is to ensure guidelines regarding ethical sourcing and modern slavery.

The requirement is for all staff to comply with Ethical Sourcing and Modern Slavery Policy.

Procedures (not required)

Purpose

The purpose of this Ethical Sourcing and Modern Slavery Policy is to outline Schwarz Family Practice's commitment to conducting business in an ethical and responsible manner. This policy aims to ensure that our supply chain and business practices are free from modern slavery, human trafficking, forced labour, and any other forms of exploitation, in compliance with the Australian Modern Slavery Act 2018

Objective

The objectives of the Ethical Sourcing and Modern Slavery Policy are to:

- Establish clear guidelines for ethical sourcing and procurement practices within the company.
- Promote transparency and accountability within our supply chain and business operations.
- Uphold human rights and labour standards, in accordance with national and international laws and regulations.
- Identify and mitigate the risk of modern slavery in our supply chain and business practices.
- Foster a culture of responsibility and ethical conduct within our organisation.

Policy Requirements

1. Supplier Due Diligence and Selection

- a. Schwarz Family Practice shall conduct a thorough assessment of potential suppliers, evaluating their labour practices and adherence to ethical sourcing principles.
- b. Suppliers must comply with all applicable national and international laws and regulations, including those relating to human rights, labour standards, and modern slavery.
- c. Suppliers shall be required to provide evidence of their compliance with this policy and their commitment to ethical business practices.

2. Supplier Contracts

- a. All supplier contracts must include clauses that explicitly prohibit the use of modern slavery, forced labour, child labour, and any other forms of exploitation.
- b. Suppliers must agree to allow Schwarz Family Practice or a designated third party to conduct periodic audits and inspections of their facilities and records to ensure compliance with this policy.
- c. Failure to comply with the terms of this policy may result in the termination of the supplier relationship.

3. Risk Assessment and Management

- a. Schwarz Family Practice shall regularly conduct risk assessments of our supply chain and business operations to identify and address any potential risks related to modern slavery or unethical practices.

- b. The company will implement appropriate risk mitigation measures and monitor their effectiveness.
- c. Any identified instances of non-compliance or potential risks must be reported to management for further investigation and action.

4. Training and Awareness

- a. Schwarz Family Practice shall provide regular training and resources to all employees involved in procurement, supply chain management, and other relevant roles, ensuring they are aware of their responsibilities under this policy.
- b. Employees are encouraged to report any concerns or suspicions of modern slavery, human trafficking, or unethical practices within the supply chain or business operations.

5. Reporting and Remediation

- a. Schwarz Family Practice is committed to maintaining open channels of communication for employees and external stakeholders to report concerns or allegations related to modern slavery or unethical practices.
- b. All reports will be treated confidentially and investigated promptly. Appropriate remedial action will be taken based on the findings of the investigation.
- c. The company will report annually on its efforts to address modern slavery in its supply chain and business operations, as required under the Australian Modern Slavery Act 2018. Under the Modern Slavery Act, reporting entities include:
 - i. Commonwealth entities and entities with an annual consolidated revenue of AUD 100 million or more.
 - ii. Entities that are the subsidiary of a reporting entity and meet a revenue threshold of AUD 50 million or more.
- d. Reporting entities are required to submit a Modern Slavery Statement annually, providing information about:
 - i. Their structure, operations, and supply chains.
 - ii. The potential modern slavery risks in their operations and supply chains.
 - iii. The actions taken to assess and address those risks.
 - iv. The effectiveness of those actions.

By adhering to the Ethical Sourcing and Modern Slavery Policy, Schwarz Family Practice demonstrates its commitment to conducting business in a responsible and ethical manner, upholding human rights, and promoting fair labour practices throughout our supply chain and operations.

The practice Manager is responsible for communicating the Ethical Sourcing and Modern Slavery Policy to all persons working for or on behalf of the organisation and making it available to interested parties.