

1.2.10 Ethical Sourcing and Modern Slavery Policy



1. PURPOSE OF POLICY

Altius Group aims to provide its customers with exceptional services to assist their employees to realise their health potential. As a national provider of services with a growing presence in the international market, Altius Group is committed to managing our business in a manner that reflects our high ethical and moral values. Altius Group is committed to upholding human rights, fair working conditions and environmental protection.

Altius Group is aware of its corporate responsibilities in relation to the Modern Slavery Act 2018. We have a zero-tolerance position on modern slavery, and we will ensure services are ethically sourced and produced to avoid modern slavery taking place in our organisations and supply chain. It is consistent with our Ethical Sourcing that expects a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations.

2. CONTEXT

Modern Slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom. This includes human trafficking, slavery, servitude, forced labour, forced marriage, debt bondage, the worst form of child labour and deceptive recruiting for labour or services.

In accordance with expectations of our customers, the community, and the requirements of the Law, we endeavour to always operate responsibly within the community and we expect the same from our suppliers and subcontractors. Maintaining a reputation for the highest legal, moral and ethical standards in our dealing with our customers and other key stakeholders is critical for our ongoing success.

3. EXPECTATIONS

We expect our suppliers to support the ethical standards set out in this Policy with regard to modern slavery, workplace safety, environment and fair pay and employment conditions. The policy sets out the standards that we expect all of our suppliers to comply with when producing and supplying products for Altius Group. Altius Group reserves the right to cease business with suppliers that do not meet the minimum ethical standards.

4. ETHICAL STANDARDS

4.1 Business Integrity

Vendors must demonstrate a high degree of professionalism and have a close affinity with our business ethics. In particular, honesty, fair dealing and the proper treatment of workers are required at all times. Offering or receiving bribes, favours, gifts, benefits, facilitation payments, secret commission, or similar unlawful or improper payments, in case or kind, are strictly prohibited, whether given to obtain business or otherwise.

4.2 Labour Rights

- Employment is freely chosen.
- There is no forced, bonded or involuntary prison labour.

- Workers are not required to lodge deposits or their identity papers with their employer and are free to leave their employer after reasonable notice.

4.3 Working Conditions

- 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.
- Workers shall receive regular and recorded health and safety training and such training shall be repeated for new or reassigned workers.
- Access to clean toilet facilities and to clean and drinkable water and, if appropriate, sanitary facilities for food storage shall be provided.
- Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- Suppliers will ensure that personal protective equipment is available, and workers trained in its use. Safeguards on machinery must meet or exceed local laws.

4.4 Child Labour

- Suppliers shall not use child labour and must only employ workers who meet the local minimum age requirement. Suppliers must verify the age of their workers and maintain evidence of workers' proof of age. Altius Group has a zero-tolerance policy to child labour.

4.5 Living Wages

- Wages and benefits paid for a standard working week meet, at a minimum national legal standards or industry benchmark standards. In any event, wages should always be enough to meet the basic needs and to provide some discretionary income.
- Vendors must comply with all laws regulating local wages, overtime compensation, and legally mandated benefits.
- All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about their particulars of their wages for the pay period concerned each time that they are paid.
- 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.

4.6 Working Hours

- Working hours comply with any Law and benchmark industry standards, whichever affords greater protection.
- In any event, workers must not be required to work excessive working hours per week including overtime and have the option of at least one day off in seven. We expect that all record keeping will be strictly accurate, complete and transparent at all times.

4.7 Discrimination

- All conditions of employment must be based on an individual's ability to do the job, not on the basis of personal characteristics.
- There must be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

4.8 Regular Employment

- To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice and international labour standards whichever affords greater protection.
- Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

4.9 Harsh or Inhumane Treatment

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

4.10 Entitlement to Work and Immigration

- Only workers with a legal right to work shall be employed or used by the supplier
- All workers, including employment agency staff must be validated by the supplier for their legal right to work by reviewing original documentation.

4.11 Sub-Contracting and Home Working

- There shall be no sub-contracting unless previously agreed with Altius Group or one of its subsidiary companies as relevant.
- Suppliers must have adequate processes in place for properly managing subcontracting and home working to ensure sub-contractors do not abuse, exploit or provide unsafe working conditions for their employees.

5. REPORTING REQUIREMENTS

Should any form of unethical sourcing, including modern slavery, be suspected team members must:

- Immediately inform their line manager.
- Inform a senior member of staff or a member of the People & Culture team in the absence of a line manager.
- Senior staff must email slavery.consultations@abf.gov.au, report the suspicion and seek further guidance.

SUPPORTING DOCUMENTATION:

Altius Group Fraud Policy

Altius Group Whistleblower Policy

VERSION CONTROL

Version	Version Date	Process Owner
1	14.01.2021	Altius Group
2	12.04.2021	Altius Group
3	12.10.2022	Altius Group