

# Supplier Code of Conduct

## Application of this Code

Epworth HealthCare is Victoria's largest not-for-profit private hospital group, renowned for excellence in diagnosis, treatment, care and rehabilitation. As Victoria's largest not-for-profit private hospital group, Epworth HealthCare is committed to ethical, sustainable and socially responsible procurement and we expect the same high standards of our suppliers.

This Supplier Code of Conduct (**Code**) applies to all suppliers of goods or services to Epworth HealthCare. We expect that our suppliers, whether directly or through their supply chain, conduct themselves in accordance with the principles and minimum standards in this Code and implement suitable management systems and processes. We also expect that our suppliers provide influence and guidance within their own supply chain to adopt the principles and minimum standards in this Code.

Epworth HealthCare expects all existing and new suppliers to commit to the Code. The expectations outlined in the Code are not intended to supersede a supplier's regulatory and contractual obligations. Suppliers should check their respective contracts, agreements and purchase orders as they may contain additional obligations or higher standards than those set out in this Code.

## Compliance with Laws

Fundamental to this Code is an expectation that all suppliers operate in full compliance with all laws, rules and regulations of the jurisdictions in which they do business. Suppliers are required to operate in compliance with all applicable national and local laws and regulations, including but not limited to those relating to modern slavery, labour, health and safety, and the environment.

## Ethics and Business Conduct

### Integrity

Suppliers are expected to 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. All forms of corruption, extortion or embezzlement are strictly prohibited. Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted.

Suppliers should observe local custom with respect to gifts, and not offer or receive gifts that could affect, or be perceived to affect, the outcome of business transactions or are not otherwise reasonable and justified.

### **Record keeping and documentation**

Suppliers are expected to maintain adequate records that accurately record all financial transactions and information regarding its business activities, labour, health and safety and environmental practices in accordance with applicable laws, policies and procedures. Disclosure of information is expected to be undertaken without falsification or misrepresentation.

### **Professional Conduct**

Suppliers are expected to conduct themselves in a manner that is fair, professional and that will not bring Epworth HealthCare into disrepute.

### **Confidentiality**

Suppliers must not improperly use any private, confidential or commercially sensitive information in its possession relating to or in connection with its dealings with Epworth HealthCare.

### **Conflict of interest**

All business activities should be undertaken with impartiality and any conflict of interest should be raised and managed. Suppliers must:

- declare any situation that raises an actual, potential or perceived conflict of interest related to or in connection with its dealings with Epworth HealthCare; and
- avoid financial, business or other relationships which may compromise the performance of their duties under their business arrangement with Epworth HealthCare.

Any conflicts of interest that cannot be avoided are expected to be declared and managed appropriately.

### **Risk assessment and management**

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

### **Privacy and Data Security**

Suppliers are expected to protect the data of Epworth HealthCare and our patients against unauthorised access, use, modification, disclosure or other misuse and against loss. Epworth HealthCare expects suppliers to implement technical solutions and security measures, including monitoring processes to protect the supply chains of the supplier and Epworth HealthCare from breaches, that are no less rigorous than accepted industry practices.

## Modern Slavery, Human Rights and Labour Standards

### Modern Slavery

Modern slavery can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. Epworth HealthCare is committed to utilising ethical suppliers and ensuring that modern slavery risks in Epworth HealthCare's supply chain are identified and that steps are taken to address these risks.

Epworth HealthCare expects suppliers to comply with all applicable modern slavery laws and take steps to ensure that there is no modern slavery in their supply chains or in any part of their business.

### Human Rights

Epworth HealthCare respects fundamental human rights. As set out in the Universal Declaration of Human Rights (UDHR), suppliers are expected to recognise and commit to upholding the human rights of workers.

### Prevention of Child Labour, Forced Labour and Inhumane Treatment

Suppliers must not engage in practices relating to, or subcontract with organisations, who employ child labour.

Suppliers must not use any forced, bonded or indentured labour or involuntary prison labour.

Suppliers must not engage in, or condone, inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion of workers.

Suppliers will ensure their activities do not contribute toward human exploitation, including human trafficking.

### Wages, Benefits and Conditions

Suppliers must:

- follow all applicable laws and regulations with respect to wages, working hours and workers compensation insurance;
- ensure that all workers receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognised holidays; and
- pay workers' wages as required under applicable laws in a timely manner and not be expected to use wage deductions as a disciplinary measure. All overtime is expected to be reasonable and paid at the rate and in accordance with the applicable laws.

Suppliers are expected to freely allow workers to associate with others, form and join (or refrain from joining) industrial organisations or associations of their choice and bargain collectively, or engage in any lawful industrial activity without interference, discrimination, retaliation or harassment.

## Health and Safety

Suppliers are expected 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 relating to workplace health and safety.

Suppliers are expected to manage occupational health and safety hazards and provide workers with job-related training and consult with employees in relation to the provision of information and training.

## Diversity

Epworth HealthCare is committed to the maintenance and promotion of workplace diversity. Suppliers are expected to respect the diversity of their workforce and others with whom they interact.

## Environment

Epworth HealthCare is committed to promoting environmental responsibility. Suppliers are expected to minimise the environmental impact of their operations and maintain environmentally responsible policies and practices.

## Monitoring and Compliance

Suppliers are expected to self-assess their compliance with the Code and take timely action to correct any deficiencies or breaches reported or identified by an audit, assessment, inspection, investigation or review.

Suppliers are expected to conduct their business in accordance with the values, principles and minimum standards addressed in this Code and with respect to all legal requirements. If requested by Epworth, Suppliers must provide evidence and confirmation of their compliance with the Code, including the provision of documents and records that support their compliance.

Epworth HealthCare reserves the right to disqualify any potential supplier or discontinue business relationships with any current supplier which has failed to comply with this Code.

## Raising a Concern and Whistleblowing

If any supplier wishes to discuss any aspect of this Code they can contact their supplier relationship point of contact directly or email [Procurement@epworth.org.au](mailto:Procurement@epworth.org.au).

Suppliers should raise concerns or make disclosures about any actual or suspected breach of this Code directly with their supplier relationship point of contact. Concerns or disclosures may also be raised made anonymously to: [EC-DisclosureOfficer@epworth.org.au](mailto:EC-DisclosureOfficer@epworth.org.au).

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