



Ethical Sourcing and Modern Slavery Policy

Connecting health solutions

1. Purpose

Sigma Healthcare Limited (**Sigma**) is committed to an ethical, and transparent approach to business and the eradication of modern slavery¹ and expects our suppliers and external stakeholders to work with Sigma to fulfil these common goals. Forced labour and the exploitation of vulnerable workers are abuses of basic human rights and have no place in Sigma's operations or supply chains.

The *Modern Slavery Act 2018* (Cth) (the **Act**) commenced 1 January 2019 and requires Sigma to publish an annual report (**Modern Slavery Statement**) which documents Sigma's approach to assessing and addressing the risks of modern slavery in its operations and supply chains.

The purpose of this policy is to ensure that the Sigma group of companies (**Sigma Group**):

- is compliant with all laws and regulations which govern its business operations, including the Act;
- work with suppliers and external stakeholders to source goods and services ethically and in accordance with its legal ethical and environmental obligations;
- assess, mitigate, and where appropriate, remedy modern slavery found to exist in its operations and supply chains, and the operations and supply chains of its suppliers and external stakeholders.

2. Principles of Ethical Sourcing and Modern Slavery

Sigma's commitment and approach to protecting human rights, eradicating modern slavery, and ethical sourcing of goods and services extends to all areas of Sigma's business and is underpinned by the following principles:

- We ensure safe working conditions, reasonable working hours and fair remuneration;
- Employment must be freely chosen and we do not tolerate forced² or bonded labour³;
- We do not tolerate child labour and require compliance with the minimum legal working age (or absent such law, in compliance with the ILO Convention 138);
- We do not tolerate discrimination, harassment or any other inappropriate workplace behaviour;
- We promote equal employment opportunities based on ability, performance and potential;
- We encourage and respect freedom of association and provide grievance mechanisms for workers to access;
- We prohibit bribes, favours, benefits or other similar unlawful or improper payments in cash or kind in exchange for business or otherwise;
- We seek assurance from, or perform due diligence on, new (or renewing) suppliers to determine their risk and the procedures adopted in relation to ethical sourcing and modern slavery; and
- We will monitor and assess compliance with the terms of this policy and to the extent possible, seek to remedy any breach of this policy.

¹ 'Modern Slavery' encompasses slavery, servitude, the worst forms of child labour, forced labour, human trafficking, debt bondage, slavery like practices, forced marriage and deceptive recruiting for labour or services.

² Forced labour is any work or service extracted from any person under the menace of any penalty, where such work has not been freely chosen by the person.

³ Bonded labour is any work which is not for compensation received by the worker, but to repay a debt, which is often incurred by another person offering the worker's labour in exchange.

3. Supporting Policies

This policy intended to be read in conjunction with the Sigma’s other governance policies and frameworks including:

- Code of Conduct;
- Health and Safety Policy;
- Diversity Policy;
- Anti-bribery and Corruption Policy;
- Whistleblower Policy;
- Environmental Management and Sustainability Policy; and
- Sigma’s general approach to sourcing and contracting under the Sigma Supplier Handbook.

4. Reporting

In accordance with the Act, Sigma Management will develop and prepare a combined Modern Slavery Statement for Sigma and the Sigma Group, for each financial year ending 31 January.

The Modern Slavery Statement must be endorsed by the Risk Management and Audit Committee and approved by the Board. The Board approved Modern Slavery Statement must be provided to the Australian Border Force for publication on an online central register within six months of the end of Sigma’s financial year.

5. Document control and related documents

Document control

This policy will be periodically reviewed in accordance with the table below to check that it is operating effectively and whether any changes are required to the policy.

Name of document	Ethical Sourcing & Modern Slavery Policy		
Document Author	Legal Counsel		
Document Approver	Board	October 2020 Board Meeting	
Document Reviewers	CEO & Managing Director	CFO	
	General Counsel & Company Secretary		
Review Period	Two-yearly		
Related documents	Code of Conduct; Health and Safety Policy; Diversity Policy; Anti-bribery and Corruption Policy; Whistleblower Policy; Environmental Management and Sustainability Policy; and Sigma Supplier Handbook.		
Change record	Version	1.0	Change Notes
	Publish date	14 October 2020	See policy version register