



**Australian Association of the Order of Malta Limited  
Modern Slavery Policy as approved at July 2022  
(Policy Number: AAOML\_P\_019)**

**Effective Date:** 27 July 2022

**Review Date:** 31 July 2024

## **1 Purpose**

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This policy affirms our commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations.

It reflects and is consistent with the ethos of the Order, which expects a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations. It is also consistent with the broader policies of the Australian Association of the Order of Malta (Order of Malta Australia). As a result, this Modern Slavery Policy is part of the Order of Malta Australia Ethical Framework.

This Policy also supports the intent of international conventions, treaties and protocols relevant to combating modern slavery and the *Modern Slavery Act (Cth) 2018*

## **2 Context**

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Modern slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom.

Order of Malta Australia values faith, service, humility, courage and fraternity. We are therefore called by our Catholic faith, mission, and values to an ethical and human response to slavery. A key priority of Order of Malta Australia is to assist people made vulnerable through migration, including people impacted by modern slavery.

Through working directly with people at risk of or experiencing human trafficking and slavery, our Order, the Sovereign Order of Malta has direct insight into the global drivers and humanitarian impact of modern slavery. Order of Malta Australia has also gained strong insights from our work directly with communities, collaborating with government agency responders and other community organisations; and undertaking research and education activities.

Order of Malta Australia commits to use these insights to contribute to ending all forms of modern slavery, both in Australia and our Asia Pacific region, by ensuring our supply chains and operations don't contribute to modern slavery practices, and to take appropriate action to respond to the humanitarian impacts of modern slavery.

## **3 Scope of Policy**

This Policy applies to all Members, candidates, applicants, employees, contractors and volunteers of Order of Malta Australia.

## **4 Definitions**

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**Modern Slavery Act 2018 (Cth)** being the Commonwealth legislation (the Act) enacted by the Parliament of Australia on 29 November 2018 (and may be amended from time to time).

**Modern slavery** for the purposes of this policy is defined as including eight types of serious exploitation outlined in Section 5.

**Operations** is defined as an activity undertaken by Order of Malta Australia.

**Partnership** means all relationships between Order of Malta Australia and a Partner whereby Order of Malta Australia grants the Partner the possibility of using its name, emblem/logo or image in its communication and promotional materials, thereby potentially creating a public association of image between the Partner and Order of Malta Australia. This relationship includes arrangements of; sponsorships, cause-related marketing initiatives, strategic alliances and joint ventures.

**Risks of modern slavery practices** means the potential for Order of Malta Australia to cause, contribute to, or be directly linked to modern slavery through its supply chains and operations.

**Suppliers** are defined as any organisation or person who provides us with goods or services, including their subcontractors, agents, related entities and consultants.

**Supply chains** is defined as the products and services (including labour) that contribute to Order of Malta Australia's own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers

## **5 What is modern slavery**

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Modern slavery is defined by the *Modern Slavery Act (Cth) 2018* to include eight types of serious exploitation and which can be understood as:

- trafficking in persons, which is the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;
- slavery, which is where the offender exercises powers of ownership over the victim;
- servitude which is where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work;
- forced labour, which is where the victim is either not free to stop working or not free to leave their place of work;
- forced marriage, which is where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony;
- debt bondage, which is where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined;
- the worst forms of child labour, which involves situations where children are: exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs; and
- deceptive recruiting for labour or services which is where the victim is deceived about whether they will be exploited through a type of modern slavery.

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It can also extend to:

- entering into a commercial transaction involving an enslaved person;
- exercising control or direction over, or providing finance for, any commercial transaction involving an enslaved person or act of slave trading;
- conducting a business involving servitude or forced labour (including exercising control over the business or providing finance to it);

### **6 Order of Malta Australia approach to limiting the risk of modern slavery practices**

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Order of Malta Australia will work proactively to reduce and ultimately end modern slavery within our supply chains and operations. We expect all organisations we engage with to do the same.

#### **6.1 Supply Chain**

##### **Order of Malta Australia Supplier Code of Conduct**

We expect all existing and new Suppliers to comply with the principles set out in our Supplier Code of Conduct. Fundamental to the Supplier Code of Conduct is an expectation that all Suppliers comply with the laws and regulations in the jurisdiction where the goods are sourced, procured or services are performed.

Suppliers must use their best endeavours no modern slavery exists in their supply chains and operations. If Suppliers identify any occurrence of, or material risk of modern slavery in their supply chains or operations they are to take practical and effective steps to address that occurrence or risk. Suppliers must notify Order of Malta Australia as soon as practicable of any event, or material risk of modern slavery they have identified and notify relevant authorities where appropriate.

##### **Order of Malta Australia's contractual terms**

Our contractual terms reflect Supplier obligations outlined in the Supplier Code of Conduct, including compliance with Australian modern slavery laws and those foreign modern slavery laws that apply in the location(s) in which they operate.

##### **Supply chain mapping and risk assessment**

We encourage our suppliers to complete a Corporate Social Responsibility questionnaire which contains questions relevant to modern slavery. Answers to this questionnaire will give us a greater understanding of the risk of modern slavery within a supplier's supply chains or operations and enable us to work with a supplier to reduce the identified risks. We will actively and progressively improve our understanding and oversight of all tiers of our supply chains.

#### **6.2 Operations**

##### **Modern Slavery Policy**

Order of Malta Australia maintains a Modern Slavery Policy (this Policy) outlining our approach to reducing the risk of modern slavery practices within our supply chains and operations. The Policy provides guidance on the steps Order of Malta Australia takes to work with suppliers to reduce risks and the range of supports available for when Order of Malta Australia becomes aware that someone is at risk of or affected by modern slavery practices.

##### **Incorporating modern slavery into other policies**

When existing policies undergo policy review or new policies are under development, policy owners must identify existing modern slavery commitments that can be enhanced, or where modern slavery protections can be incorporated.

##### **Ethical Investments**

The Ethical Screening of Investments Guidelines seeks to ensure that the investment of Order of Malta Australia funds is consistent with the Vision, Mission and Values of Order of Malta Australia. As such, no investment should be made in companies who engage in activities or services that could be directly viewed as considerably compromising Order of Malta Australia..

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### **Human Resources**

We are committed to ensuring the health, safety and wellbeing of our workforce. We maintain a suite of policies that are informed by and compliant with Australian workplace and occupational health and safety laws. We ensure that our volunteers are engaged on a truly voluntary and non-exploitative basis

### **Partnership Screening**

The Strategic Alliances, Partnerships and Joint Ventures Policy and associated guidelines requires Order of Malta Australia to complete a partnership screening tool before entering into a partnership with another organisation.

Prospective partners are automatically disqualified from public association with Order of Malta Australia if they are knowingly or deliberately engaged in activities running counter to:

- Order of Malta Australia's vision, mission and values;
- Principles of International Humanitarian Law;
- Internationally recognised standards of human rights, labour rights and protection of health; and
- Are involved in the manufacturing or selling of arms, ammunition, tobacco or pornography.

## **7. Reporting concerns of modern slavery**

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### **7.1 Reporting unethical or unlawful conduct**

A key part of supporting ethical standards is enabling all Members, candidates, applicants, employees, contractors and volunteers of Order of Malta Australia and Other People (including Suppliers and Partners) to feel free and safe to speak up when there are reasonable grounds to suspect that Order of Malta Australia is not acting ethically or in accordance with laws and obligations.

Concerns about compliance, ethical issues, or illegal or unethical activities are to be reported according to the Order of Malta Australia Whistleblower Policy.

Reports of unethical or unlawful conduct will be responded to in accordance with the Order of Malta Australia Whistleblower Policy.

### **7.2 Responding to concerns of modern slavery practices**

The often hidden nature of modern slavery practices means it can be difficult to identify and difficult to report. It is important to respond in a safe, ethical way and respect the dignity and rights of the person at risk or affected by modern slavery practices.

There are a range of supports available for when a Member, candidate, applicant, employee, contractor or volunteer of Order of Malta Australia or another person becomes aware that someone is at risk of or affected by modern slavery practices, regardless of whether this occurs within Order of Malta Australia supply chains and operations or in the broader community.

In Australia, the Australian Federal Police is responsible for investigating suspected cases of modern slavery and can be contacted on 131 237 to discuss or report a suspected case. Contact can be made anonymously.

If someone is in immediate danger in an emergency, please call Triple Zero (000) for police assistance.

## **8 Related Policies and Documents**

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1. Financial Delegation of Authority Policy
2. Conflict of Interest (Register of Interests) Policy
3. Strategic Alliances, Partnerships and Joint Ventures Policy and Strategic Alliance Guidelines
4. Whistleblower Policy
5. Ethical Screening of Investments Guidelines

## **9 Review**

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This Policy will be reviewed periodically and updated when required.

The National Treasurer, National Hospitaller, Chancellor and Company Secretary is responsible for overseeing the review, and recommending changes to the National Executive Council.

This Policy is approved by the National Executive Council.