

Policy category	CS - Corporate		
Best care goals	<input checked="" type="checkbox"/> Safe	<input checked="" type="checkbox"/> Personal	<input checked="" type="checkbox"/> Connected <input checked="" type="checkbox"/> Effective
Applies to	National		
Version	Approval authority	Effective from	'Review due' date
1	General Counsel & Executive Director, Contracts, Procurement & Risk	23/02/2026	23/02/2029

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1. Purpose

This Supplier Code of Conduct outlines the standards and expectations that apply to all suppliers, contractors, consultants, and partners (“Suppliers”) who provide goods or services to Silverchain. Silverchain is committed to delivering high-quality, safe, equitable and respectful aged-care services. It expects its Suppliers to uphold these values and comply with the principles in this Code which applies to all Suppliers and their personnel and subcontractors engaged in work for or on behalf of Silverchain.

The obligations in this Code do not supersede any contractual obligations a Supplier may have to Silverchain, nor does it alter any legislative obligations.

Suppliers must implement and maintain systems, processes, policies and procedures as necessary to ensure compliance with this Code.

2. Policy statement

Silverchain is committed to working with suppliers who demonstrate the highest standards of ethical conduct, integrity, safety, and respect. This Supplier Code of Conduct sets out the minimum expectations and requirements for all suppliers and their personnel (including any subcontractors) in relation to the provision of goods or services to Silverchain. Suppliers are expected to comply with all applicable laws and regulations, uphold human rights, support safe and inclusive workplaces, protect privacy and confidentiality, and act in a manner consistent with Silverchain’s values and commitment to delivering safe, personal, connected and effective care.

3. Roles and responsibilities

This policy applies to:	Suppliers to Silverchain Group Ltd and its controlled entities.
Suppliers	<ul style="list-style-type: none"> To understand and comply with the Supplier Code of Conduct in the provision of goods or services to Silverchain. To ensure that its personnel (including subcontractors) understand and comply with the Supplier Code of Conduct as applicable.
All staff	<ul style="list-style-type: none"> To promote awareness of the Supplier Code of Conduct in any dealings with third party suppliers to Silverchain (including their personnel) and to raise with managers any instances of an actual or suspected breach of the Code by a supplier.
Managers	<ul style="list-style-type: none"> To be aware of the Supplier Code of Conduct when dealing with third party suppliers to Silverchain. To ensure any suppliers with whom they are dealing (and their personnel) are aware of the Supplier Code of Conduct. To escalate any instances of an actual or suspected breach of the Supplier Code of Conduct as appropriate.

4. Policy principles

When a supplier works for or with Silverchain, they and their personnel are expected to operate in a manner consistent with Silverchain's values of **integrity, respect, trust and compassion**.

This includes having in place policies, procedures and systems of work to ensure:

- Respect and dignity for all clients (including their families and carers) and personnel
- Integrity and transparency in all business dealings
- Equity, inclusion, and non-discrimination
- Commitment to safety (of both clients and personnel) and high-quality care
- Accountability and ethical behaviour.

4.1 Compliance with laws and regulations

Suppliers must comply, and must ensure personnel comply, with all applicable Australian state and federal laws, regulations, standards, and codes relevant to their work, including but not limited to:

- *Aged Care Act 2024* (including the strengthened Aged Care Quality Standards and the Statement of Rights) and *Aged Care Rules 2025*
- Work Health and Safety laws
- Privacy legislation (including the *Privacy Act 1988* & Australian Privacy Principles)
- Fair Work Act and modern award obligations
- Anti-discrimination and gender equality laws
- Anti-modern slavery laws
- Environmental laws.

4.2 Delivery of services to Silverchain clients

Best Care is the way Silverchain and its personnel work to ensure safe, personal connected and effective care and services for every person, every time.

The Best Care Strategic Quality and Safety Framework BC-FMWK-0001 ('Framework') provides guidance for suppliers and their personnel who are involved in delivery of care to Silverchain clients to perform their role in achieving Best Care. The Framework ensures everyone is informed regarding what Best Care is, the actions Silverchain will take every day to achieve it, how team members will be supported and how Silverchain tracks its progress towards Best Care for every client.

Where suppliers are involved in delivering care to Silverchain clients, they are expected to uphold the principles of Best Care by:

- Providing a physically, culturally and emotionally safe client experience.
- Working in partnership to provide care and services focused on client needs and preferences.
- Facilitating a smooth, integrated care experience that meets the client's needs.
- Providing the right care in the right way.
- Responding sensitively and respectfully to clients and their families, considering the culture and language and always involving them in planning and decisions about their care.
- Working in partnership with clients to ensure they are safe from harm and able to exercise informed decision making.
- Working as a team player to make sure care is organised around the client and is well connected.
- Ensuring they are competent and skilled in their work to deliver care that provides a quality experience for the client, their carer and support/kinship network.

When delivering services to Silverchain clients, Suppliers must, and must ensure that their personnel:

- Comply with any applicable working validation requirements, including those set out in any contract between the supplier and Silverchain.
- Act in accordance with the Best Care Strategic Quality and Safety Framework.
- Understand and comply with the Aged Care Code of Conduct PC-POL-0048 where providing aged care services.
- Respect the autonomy, privacy, and dignity of older people.
- Respond appropriately to any suspicion of elder abuse or neglect.
- Promptly report concerns in line with Silverchain's Safeguarding Policy BC-POL-0084.
- Ensure no action or inaction causes harm, distress or exploitation.
- Comply with any contractual reporting or escalation requirements.

4.3 Human rights, labour and employment standards

Silverchain values and respects all human rights and strongly opposes all forms of modern slavery and exploitative labour practices.

Suppliers must (in any jurisdiction where they operate):

- Prohibit child labour, forced labour, and human trafficking.
- Ensure fair wages, lawful working hours, and entitlements.
- Maintain safe and respectful working conditions.
- Ensure freedom from harassment, bullying, discrimination, or retaliation.
- Respect freedom of association and lawful employee representation.
- Undertake appropriate due diligence in relation to their supply chains and have in place effective measures to promote compliance with applicable laws and ethical standards - in particular, to ensure that there is no modern slavery, forced labour, child labour, human trafficking or other exploitation occurring.
- Report to Silverchain any suspected situations of modern slavery in their supply chain.

4.4 Health, safety and wellbeing

Silverchain suppliers and subcontractors (and their personnel) are expected to strive to do the right thing and treat each other with care and respect. This includes looking out for their own safety and the safety of their colleagues, clients and communities. Suppliers, subcontractors and their personnel have a responsibility to ensure that they maintain the compliance and competence needed to perform their work safely and well.

Suppliers must:

- Provide safe and compliant equipment, products, and services.
- Follow all site-specific WHS requirements.
- Implement policies and procedures to prevent bullying, harassment and discrimination in the workplace.
- Ensure personnel are properly trained, licensed, and competent before they provide any services to Silverchain and its clients.
- Report incidents, unsafe conditions, and risks promptly and ensure their personnel know how and when to escalate incidents, unsafe conditions and risks.
- Ensure work practices do not endanger residents, clients, personnel or visitors.
- Comply with any specific contractual provisions relating to health, safety and wellbeing.
- Ensure all personnel are fit for work when performing services for Silverchain.

- Ensure personnel comply with any relevant policies and procedures including those related to WHS.
- Deal with reported WHS issues promptly and appropriately, taking any corrective action necessary.

4.5 Privacy and confidentiality

Silverchain protects personal information and provides Best Care by valuing the privacy of everyone including its clients, their families and team members and expects its suppliers and their personnel to do the same.

Suppliers must, and must ensure their personnel:

- Protect personal, health and sensitive information.
- Use such information only with consent and for the purpose for which it was provided.
- Store and transmit information securely.
- Not store or transmit data outside of Australia without Silverchain's prior written approval.
- Ensure access to any data is secure and protected from cyber incidents, unauthorised access or data breaches. Report known or suspected data breaches immediately and in accordance with any contractual provisions.
- Refrain from disclosing any confidential information (which may include information related to Silverchain's business).
- Comply with any other contractual obligations in relation to privacy and the handling of personal information.

Suppliers must comply with the *Privacy Act 1988*, Australian Privacy Principles, and any Silverchain procedural requirements notified to them in relation to privacy.

Where a supplier or their personnel are provided with equipment or resources to assist them in delivering services to Silverchain and/or its clients, they have a responsibility to take care of all equipment and resources provided and adhere to any Silverchain policies, procedures or guidance on usage including:

- Using resources for Silverchain business purposes only.
- Being considerate of the economic and environmental impact of their choices.
- Caring for equipment.
- Ensuring intellectual property remains the property of Silverchain and is appropriately protected.
- Not tampering with GPS settings on any Silverchain devices.

4.6 Professional standards and behaviour

Suppliers are expected to demonstrate professional standards and behaviours consistent with Silverchain's expectations including by:

- Living the values of integrity, respect trust and compassion.
- Maintaining all compliance requirements to perform the services.
- Working within the scope of practice, training and position description.
- Following all relevant policies and procedures and speaking up when there are challenges in doing so.
- Undertaking mandatory and compulsory training.
- Respecting and maintaining professional boundaries.
- Never seeking or accepting and personal or financial gift or benefit from a client.

- Acting with honesty and transparency.
- Declaring any actual or potential conflicts of interest.
- Avoiding offering gifts, benefits or hospitality that may influence decisions.
- Not engaging in fraud, bribery, corruption, or unethical behaviour.

4.7 Diversity and inclusion

Silverchain recognises that diversity is essential for it to deliver a client centred approach and that there are many benefits a diverse workforce brings.

Suppliers and their personnel are expected to promote an inclusive environment by:

- Promoting equal opportunity.
- Treating everyone fairly and with respect.
- Not discriminating, harassing, bullying or participating in any offensive or intimidating behaviour.
- Supporting and respecting people's individuality.
- Taking action when they see something that is not right.

4.8 Environmental responsibility

Suppliers are encouraged to:

- Minimise waste, emissions, and energy use
- Use sustainable materials and environmentally responsible practices
- Comply with environmental legislation and standards
- Support recycling and responsible disposal.

4.9 Quality and continuous improvement

Suppliers must:

- Provide goods and services that meet agreed standards and specifications
- Ensure products are safe, reliable and fit for purpose
- Demonstrate continuous quality improvement in service delivery
- Cooperate with audits, evaluations, and performance monitoring
- Be aware of, and direct clients to, Silverchain's complaints process where relevant and in accordance with any contractual obligations.

4.10 Subcontracting

Suppliers must:

- Obtain approval before engaging subcontractors
- Ensure subcontractors comply with this Code
- Remain accountable for subcontractor behaviour and performance
- Comply with any other contractual obligations regarding subcontractors.

4.11 Reporting misconduct (including whistleblowing disclosures)

Suppliers must report known or suspected wrongdoing including:

- Safety hazards
- Abuse, neglect or exploitation
- Fraud, corruption, bribery

- Serious breaches of this Code
- Breaches of the *Aged Care Act 2024*.

Suppliers involved in the provision of aged care services must understand and comply with, and ensure their personnel understand and are appropriately trained in relation to, the whistleblowing provisions in the Aged Care legislation, and that they:

- (a) are aware of their right to make a whistleblowing disclosure in accordance with the legislation and Silverchain's [Whistleblower Policy](#) available on the Silverchain website; and
- (b) are aware of their legislative obligations in the event they receive a whistleblowing complaint.

Whistleblowing disclosures can be made by any supplier or their personnel (regardless of whether they are delivering aged care services) using the contact details set out in Silverchain's Whistleblower Policy. Concerns other than whistleblowing disclosures can be reported via procurement@silverchain.org.au or 1300 650 803.

5. Acknowledgement and acceptance

Suppliers must confirm they have:

- Read and understood this Code
- Implemented systems and processes to ensure compliance
- Communicated the requirements set out in the Code to relevant personnel and subcontractors.

Acknowledgement may be required as part of tendering, contracting, or onboarding, or at any other time at Silverchain's discretion.

Non-compliance with this Supplier Code of Conduct may result in suspension, termination of contract, or removal from Silverchain's preferred supplier list.

Disclaimer

The Supplier Code of Conduct is not designed to be an exhaustive list of Silverchain's policies and procedures applicable to suppliers. It highlights key expectations regarding behaviour and should be read in conjunction with any contract the Supplier has with Silverchain and any other relevant policies and procedures.

Silverchain reserves the right to review and update this Supplier Code of Conduct from time to time. Any updated version of the Code will be effective from the time it is published on our website. Suppliers should review the Code periodically.

If a Supplier has any concerns or questions about the Supplier Code of Conduct, they can contact procurement@silverchain.org.au.

6. Escalation and reporting

Complaints, incidents or feedback are to be reported and escalated according to incident management, complaints and feedback policies and procedures.

7. Relevant standards

- Aged Care Quality Standards
- Statement of Rights.

8. Relevant legislation

- *Aged Care Rules 2025*
- *Aged Care Act 2024*
- *Privacy Act 1988* (including the Australian Privacy Principles)
- Various other federal and state legislation as referred to in clause 4.1.

9. Related information

Policies	
Whistleblower (External) Policy	Aged Care Code of Conduct (PC-POL-0048)
Safeguarding Policy (BC-POL-0084)	National Procurement Policy (CS-POL-0044)
Procedures	
National Procurement Procedure (CS-PRO-0004)	
Work Instructions	
Nil.	
Forms	
Nil.	
Other (eg regulations etc)	
Best Care Strategic Quality and Safety Framework (BC-FMWK-0001)	

10. Definitions

There are no terms.

11. Document details

Document owner	Procurement Operations Lead
Consumer participation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not Applicable
Document type	POL - Policy
Functional area	Contracts and Procurement
Periodic review	36 months

Silverchain Group policies align with relevant legislation and standards and are based on providing a fair, inclusive, and safe working environment free from bullying and discrimination and one that enables equal opportunity for all Silverchain Group staff.

Our policies embody our values of integrity, respect, trust, and compassion.