



Corporate Social Responsibility (CSR) Policy

Version 1.0	Updated 09/09/2025	Next review 09/09/2026
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1. Policy Statement

Marco Polo Portal is committed to operating responsibly, ethically, and sustainably while delivering technology that empowers people with disabilities to live better, more independent lives.

Our CSR approach integrates **environmental responsibility, social impact, ethical governance, and community partnerships** into every aspect of our operations. We recognise that our business success is inseparable from the wellbeing of the communities we serve, particularly NDIS participants, their families, and providers.

2. Scope

This policy applies to all directors, employees, contractors, suppliers, and partners of Marco Polo Portal across all operations and services.

3. CSR Pillars

3.1 Environmental Responsibility

- Comply with the **Environmental Management Policy** and **Environmental Management Plan (EMP)**.



- Minimise our ecological footprint through paperless systems, renewable-powered cloud hosting, and waste reduction.
- Offset unavoidable emissions and continuously improve sustainability performance.

3.2 Social Impact & Inclusion

- Empower people with disability through our core platform, enabling **choice and control** in housing and living arrangements.
- Ensure accessibility of our services in line with **WCAG 2.1 AA** standards.
- Create employment opportunities for people with disability, women, Aboriginal and Torres Strait Islander peoples, and other underrepresented groups.
- Support employees affected by **domestic and family violence**, providing paid leave and flexible arrangements.
- Uphold the **NDIS Code of Conduct** in all dealings with participants and providers.

3.3 Indigenous Engagement

- Honour commitments under the **Indigenous Engagement & Supply Policy** and Plan.
- Direct a minimum of **3% procurement spend** to Indigenous-owned businesses, in line with the Commonwealth Indigenous Procurement Policy (IPP).
- Build respectful partnerships with Indigenous communities and suppliers.

3.4 Ethical Governance

- Uphold transparency, accountability, and integrity in decision-making.
- Protect privacy and confidentiality of personal data in line with the **Privacy Act 1988 (Cth)**, **Australian Privacy Principles**, and **NDIS Practice Standards**.
- Implement secure systems and comply with the **Notifiable Data Breaches Scheme**.



- Ensure directors, employees, and contractors act in compliance with the **Corporations Act 2001 (Cth)**, the **Fair Work Act 2009 (Cth)**, and other relevant laws.

3.5 Community Engagement & Partnerships

- Partner with NDIS providers, coordinators, and advocacy groups to co-design better housing solutions.
- Support community initiatives that align with disability rights, inclusion, and housing.
- Engage with policymakers and industry to promote reforms that improve outcomes for people with disability.

4. Implementation

CSR principles are embedded into Marco Polo Portal's governance and operations through:

- Annual CSR objectives and KPIs approved by the Board.
- Cross-functional accountability across HR, Procurement, Technology, and Operations.
- Publication of CSR performance in annual reporting to stakeholders.
- Integration of CSR considerations into procurement, recruitment, and business planning.

5. Monitoring & Reporting

- **Quarterly reviews** of CSR performance metrics (environment, diversity, procurement, accessibility, privacy compliance).
- **Annual CSR Report** to the Board and, where relevant, external stakeholders.



- Corrective actions implemented promptly where targets are not met.

6. Responsibilities

- **Board of Directors** – oversight of CSR strategy and performance.
- **CSR Officer** (or equivalent) – coordinates initiatives, tracks KPIs, and prepares reports.
- **Managers** – ensure CSR principles are applied in day-to-day operations.
- **Employees & Contractors** – expected to uphold CSR values and participate in training.
- **Suppliers & Partners** – required to align with Marco Polo Portal's CSR commitments.

7. Continuous Improvement

This policy will be reviewed annually to ensure alignment with evolving legislation, industry best practice, and stakeholder expectations. Marco Polo Portal is committed to progressively raising its CSR standards as the business grows.

8. References

- Corporations Act 2001 (Cth)
- Fair Work Act 2009 (Cth)
- Privacy Act 1988 (Cth) & APPs
- NDIS Act 2013 (Cth), Code of Conduct, and Practice Standards



- Commonwealth Indigenous Procurement Policy (IPP)
- UN Sustainable Development Goals (SDGs 5, 8, 10, 12, 13, 17)
- Marco Polo Portal: Environmental, Diversity, DFV, Privacy, and Indigenous Policies

Approved by:

Board of Directors, Marco Polo Portal

Date: 09/09/2025