



Supplier Policy

SECTION	SUPPLIERS	
<p>POLICY STATEMENT</p>	<p>Sonic Healthcare Limited (Sonic) is an international healthcare company focussed on delivering quality, independent services in medical diagnostics and multi-disciplinary medical practices. To ensure that Sonic maintains its global reputation for quality, safety and service excellence, Sonic expects all of its major suppliers, service providers and any other agents or contracted third parties (collectively referred to as Suppliers) to adopt an approach to ethical business practices and sustainability that is consistent with Sonic's high standards.</p> <p>The Board of Directors, CEO and senior executives are responsible for setting the supplier code of conduct and overseeing compliance, however it is the responsibility of each Sonic Employee exposed to dealing with Suppliers to adhere to these standards.</p> <p>This general company-wide Policy does not override specific policies, procedures, laws or regulations in the local jurisdictions, but instead serves to complement them. If there is a conflict between this Policy and a specific local policy, procedure, law or regulation then this conflict should be referred to the local CEO and Sonic's Company Secretary in Australia.</p> <p>Sonic's Supplier Policy has been implemented to ensure that, as far as possible, Sonic's Suppliers will:</p> <ul style="list-style-type: none"> • Comply with all relevant laws, regulations and governmental requirements and directions; • Conduct their business in an ethically appropriate manner; • Seek to pursue environmentally sustainable business practices; • Treat all individuals, including employees and customers, with respect and dignity, including observing all relevant laws and regulations regarding discrimination, equal opportunity and individual and human rights; and • Abide by the procedures of customer organisations. <p>Sonic's major Suppliers (those suppliers whose commercial relationship with Sonic meets appropriate quantitative and qualitative materiality thresholds) have been provided with this Policy and asked to confirm that they will comply with the Policy. Sonic seeks to include relevant aspects of its Supplier Policy into request for proposals or contracts when entering into formal arrangements with Suppliers or potential Suppliers.</p>	
<p>DEFINITIONS</p>	<p>Associate</p>	<p>Associate means any third party (individual or organisation) who is not an employee, but is performing work on behalf of Sonic Healthcare (or a Sonic Healthcare subsidiary). This includes but is not limited to, consultants, contractors, joint venture partners (and their employees), stakeholders and other business partners.</p>
	<p>CEO</p>	<p>Means the chief executive officer, president or equivalent business head of a Sonic subsidiary.</p>
	<p>Employee</p>	<p>Any person conducting business on behalf of Sonic Healthcare (or a Sonic Healthcare subsidiary), whether employed in a permanent, casual, fixed term, temporary or agency capacity.</p>



	Sonic	'Sonic' means Sonic Healthcare Limited and its subsidiaries, being all companies within the Sonic Healthcare Group worldwide (including controlled Joint Ventures).
	Third parties	Third parties are any individuals or organisations with whom Sonic Employees or Associates come into contact during the performance of their duties for Sonic. This includes but is not limited to, customers (actual or potential), suppliers, health insurers, consultants, advisors, government agencies and other public bodies.
TO WHOM DOES THIS POLICY APPLY?	This Policy applies to all Sonic subsidiaries and their Employees, Associates and Directors. Companies and joint ventures in which Sonic has a non-controlling interest are also encouraged to apply this Policy.	
COMPLIANCE WITH THE LAW	Sonic requires its Suppliers to ensure that, at all times, they and all of their officers, employees, agents, contractors and other representatives adhere to all relevant applicable laws and regulations (including any valid requirements or directions of government departments or agencies). In addition, Suppliers are required to ensure that they do not commit or participate in any acts of fraud, corruption, bribery or other conduct that either breaches laws relating to such conduct or would reflect adversely on themselves or Sonic.	
CODE OF ETHICS	<p>Sonic has adopted a Code of Ethics ("Code") that outlines the standards required so that Sonic's people conduct themselves with the highest ethical standards. All Employees of Sonic are informed of the Code. The directors regularly review this Code to ensure it reflects best practice in corporate governance.</p> <p>Sonic expects its Suppliers to adhere to similarly high standards of ethical conduct at all times. This includes:</p> <ul style="list-style-type: none"> • ensuring they do not become involved in situations which would constitute a conflict of interest with their commercial relationship with Sonic; • treating all commercial information as confidential especially in, but not restricted to, their dealings with competitor organisations; • ensuring any gifts provided to customers, including Sonic, be of nominal value; • not offering to Sonic staff members paid travel expenses, accommodation or conference registration without the consent from the Sonic staff member's CEO to do so; • restricting any market sensitive information obtained from Sonic to only those employees within the Supplier organisation with a direct "need to know"; and • not making disparaging, untrue or misleading statements about Sonic, Sonic Employees, competitors, customers or other industry participants. 	
ENVIRONMENTALLY SUSTAINABLE BUSINESS PRACTICES	<p>Sonic recognises its corporate responsibility to respect and improve the environment in which we work and live. Sonic is committed to meet all relevant regulatory and legislative environmental requirements, to achieve continual improvement in environmental performance and to minimise pollution and waste.</p> <p>In addition, Sonic is committed to:</p> <ul style="list-style-type: none"> • seeking to continuously reduce water usage within the requirements of delivering high quality health care and as far as practicable maximising efficient water management; • identifying and reducing waste, and conserving resources through adopting sustainable purchasing principles where clinically appropriate and commercially viable, and encouraging suppliers and contractors to 	



	<p>address environmental management and performance;</p> <ul style="list-style-type: none"> • reducing energy consumption and minimising greenhouse gas emissions; • providing education and training to Sonic staff and Suppliers on environmental matters including waste reduction strategies; • visiting Supplier and service provider sites to conduct inspection audits; and • planning disaster mitigation strategies to reduce adverse environmental outcomes. <p>Sonic expects that its Suppliers will adopt a similar approach to ensuring they conduct their business operations in a manner that promotes environmental sustainability, adheres to all relevant laws and regulations and aims to reduce waste. When choosing significant suppliers, a formal assessment is made of their environmental policies and credentials.</p>
<p>RESPECT FOR THE INDIVIDUAL</p>	<p>One of Sonic's Core Values is to "Treat Each Other with Respect and Honesty", with the objective of growing a workplace where trust, team spirit, and equity are an integral part of everything Sonic does.</p> <p>In building commercial relationships with Suppliers, Sonic expects those organisations to adopt a similar approach to treating all individuals with which they interact, including employees and customers, with respect and dignity. More specifically, this includes:</p> <ul style="list-style-type: none"> • adherence to all relevant laws and regulations in relation to non-discrimination, equal opportunity, sexual harassment and human rights; • not using any form of bonded, slave or child labour; • providing a safe, healthy and comfortable workplace, including compliance with all relevant workplace health and safety laws and regulations, as well as abiding by the safety principles of each Sonic entity with which the Supplier has a relationship; • maintaining a blame-free work environment where employees are encouraged to report misconduct, illegal or inappropriate behaviour free from any threat of reprisals or other adverse consequences; • providing and supporting freedom of association for employees to join trade unions and other employee representative groups and for those groups to bargain collectively on behalf of employees; • employing only those individuals with a legal right to work in that jurisdiction; • complying with all relevant laws and regulations in relation to legal minimum rates of pay and other conditions of employment for workers, such as fair working hours, meal and rest breaks and other conditions designed to enhance employee health and safety; • prohibiting physical abuse, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation in both the workplace and in relationships with customers; • treating staff fairly and equitably, including providing written confirmation of their terms and conditions of employment; and • ensuring all employee entitlements and prescribed conditions of employment under relevant laws and regulations are adequately implemented and accounted for. <p>When choosing significant Suppliers, an assessment is made of their social policies and credentials.</p>



ADHERENCE TO CUSTOMER'S PROCEDURES	<p>Sonic has developed a set of procedures to enhance and streamline commercial relationships with Suppliers and also to protect Suppliers' safety when on site in Sonic laboratories and other locations. Sonic expects Suppliers to adhere to these procedures. These include:</p> <ul style="list-style-type: none">• adhering to the safety procedures of each Sonic entity which may include registration when visiting on site, wearing protective clothing when servicing medical equipment; and• adhering to the procurement policies of Sonic, which include referring all pricing, contractual and other commercial matters to the Sonic procurement department in the relevant jurisdiction.
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