

Sonic Healthcare Limited Code of Ethics

Introduction

Sonic Healthcare, together with all its subsidiaries, is an organisation committed to ethical practice. The Sonic Healthcare Code of Ethics is a set of fundamental principles that serve as a guide to staff in all areas of the organisation.

Because of their special knowledge and expertise, those working in healthcare have a responsibility to improve and maintain the health of patients who, either in a vulnerable state of illness or for the maintenance of their health, entrust themselves to this care. Staff members of Sonic have a duty to themselves, fellow workers, the Company, customers and the community to uphold basic principles of honesty and integrity in their professional and business dealings at all times.

The Managing Director and Senior Executives are responsible for setting the ethical code and overseeing compliance with these standards. However, it is the responsibility of each Sonic employee to adhere to these standards.

Because advancing knowledge and technology may present new ethical issues, no set of guidelines should be considered the absolute last word in all circumstances. If there is any question in interpreting the ethical guidelines, it is an employee's responsibility to consult a supervisor. However, a violation of any guideline could result in disciplinary action, including dismissal.

1. Sonic Staff and the Customer (referring Doctors and patients)

1.1 Standards of Service

- (a) Provide the highest standard of service to all customers in all situations. Promote excellence at all times, ensuring courteous and professional communications to all customers.
- (b) Sonic Healthcare has a commitment that all its staff be appropriately qualified, trained and competent to carry out their duties.

1.2 Respect for Patients

- (a) Treat patients with compassion and with respect for their human dignity.
- (b) Ensure that your professional conduct is above reproach.
- (c) Where appropriate, informed consent (either verbal or written in specific instances) should always be obtained either from the patient or their guardian when performing any procedure.

1.3 The Patient and the Specimen

- (a) Be constantly aware of the responsibility entrusted in you to handle a patient's specimen.
- (b) Recognise the importance of every test requested on a patient specimen.
- (c) Treat each specimen with care, diligence and professional excellence, as if the specimen were indeed the patient!
- (d) Where the Company lacks the necessary knowledge, skill or facilities to provide testing for a patient, it has an ethical obligation to refer that specimen on to another professional organisation.

1.4 Confidentiality

Keep in confidence information derived from a patient, or from a patient's specimen, and divulge it only to the referring doctor when so requested, or with the patient's permission.

2. Corporate Principles

2.1 You and Your Job at Sonic Healthcare

- (a) It is an individual's responsibility to ensure that Sonic Healthcare's reputation for integrity in both medical and business ethics, as outlined in the Code of Ethics, is maintained.
- (b) Avoid practices detrimental to customers or fellow workers.
- (c) If you acquire knowledge of an unlawful or unethical situation, it should be reported immediately to your supervisor.
- (d) Sonic Healthcare strives to maintain a healthy, safe and productive environment which is free from discrimination and harassment based on race, colour, religion, sex, sexual orientation, age, national origin or disability.
- (e) All personnel information is regarded as confidential.
- (f) Accept only reliable information regarding organisational changes and avoid dealing in rumours.
- (g) Employees are personally responsible for protecting Company property entrusted to them, including intellectual property and information systems.
- (h) Much Company proprietary information is the result of ideas and hard work by past and fellow employees over many years. It is often based on substantial investment in planning, research and development. This information may give Sonic Healthcare a competitive advantage in the marketplace. As such, proprietary information should be regarded as confidential. If unsure of what proprietary information is confidential, ask you supervisor.

- (i) Employees are responsible for maintaining their own knowledge and partaking in ongoing education. However, the organisation will assist by a spectrum of support activities involving staff ongoing education and training.
- (j) Employees should pass on their skills and knowledge to fellow workers.

2.2 Conducting Business

- (a) Be informed, approachable and professional with all customers.
- (b) All dealings on behalf of Sonic Healthcare should be ethical and comply with all laws and regulations affecting the business.
- (c) Avoid misrepresentations to doctors, patients and other customers.
- (d) Seeking reciprocity with doctors or other customers is contrary to Sonic Healthcare policy and may often be unlawful.
- (e) Gifts to doctors or customers should be restricted to those with educational or advertising purposes or should have nominal value.
- (f) Do not advertise services or make announcements to referring doctors or other customers unless the chief purpose of the notice is to present information reasonably needed by any referring doctor or other customer to make an informed decision about the appropriateness and availability of your service. Ensure this announcement or advertisement is demonstrably true in all respects.
- (g) False and misleading statements about competitors should be avoided. All comparisons should be substantiated.
- (h) If you receive confidential or restricted information, you should not use, copy, distribute or disclose that information except in accordance with an agreement or understanding between the parties.
- (i) Suppliers should be judged on the value of their product and service only.
- (j) Gifts from suppliers should not be accepted if they could influence, or could reasonably give the appearance of influencing, the business relationship with that supplier or customer.
- (k) Do not enter into any contract with another organisation which may diminish the maintenance of Sonic Healthcare's autonomy and integrity.
- (l) Sonic Healthcare is committed to a safe working environment for all staff. All employees should comply with all occupational health and safety regulations.
- (m) The organisation is committed to environmental protection. All staff should comply with all environmental laws and regulations, and are encouraged to develop and maintain environmentally friendly work practices.

2.3 On Your Own Time

- (a) Situations involving a conflict of interest should be avoided.
- (b) Significant financial interests in competitors may present a conflict of interest and should be declared.
- (c) When someone close to you (e.g. partner or family member) also works in the organisation or industry, you must be mindful of issues of sharing confidential information or conflicts of interest. If uncertain about any situation, discuss it with your supervisor.
- (d) Staff who are party to significant confidential and financial information should be mindful of the regulations regarding Insider Trading in Australia (i.e. trading in Company shares).
- (e) Non-Sonic Healthcare income-generating work should not be performed on business premises or with the Company's equipment.

2.4 Management/Staff Relations

- (a) Managers and Supervisors should always treat subordinate staff in a fair and reasonable manner with respect for their rights and dignity as individuals.
- (b) If staff consider themselves aggrieved by either an action or a decision by a Manager/Supervisor and they are unable to satisfactorily resolve this issue directly with the Manager/Supervisor, then they have a right to seek resolution of the issue with a Manager more senior than the Manager/Supervisor in question.
- (c) Employment of staff should be based on qualifications, skills and personal attributes only. Relationships to other incumbent staff members should not cause prejudice for or against the employment of any prospective employee.