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Labour Standards and Human Rights Policy



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Policy statement

Sonic Healthcare Limited (Sonic) is a global healthcare company focussed on delivering quality, independent services in laboratory medicine/pathology, radiology/diagnostic imaging and primary care medical services. Sonic, together with all its subsidiaries, is committed to respecting human rights and upholding labour standards. As a healthcare company, this respect and commitment is central to the success of Sonic's entities in all the communities in which it operates, and Sonic considers modern slavery and human trafficking of any kind, including forced labour and child labour, to be completely unacceptable.

This Labour Standards and Human Rights Policy is aligned with the principles established within the Universal Declaration of Human Rights, and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. In combination with Sonic's Core Values and Code of Conduct, this Policy reinforces the commitment to ensuring all internal and external stakeholders are treated with dignity and respect. As part of due diligence when entering into supplier relationships, acquisitions, new operations and other contractual arrangements, Sonic seeks to abide by the requirements set out in this document to ensure any labour standards and human rights issues are identified and assessed.

Sonic's Board of Directors, CEO and senior executives are responsible for setting the ethical code of this Policy and overseeing its compliance, however it is the responsibility of each Sonic Employee to adhere to the standards outlined in this document.

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, law or regulation, this conflict should be referred to the local CEO as well as Sonic's Company Secretary in Australia.

The purpose of this Policy is to set out the responsibilities of Sonic, its Employees and Associates in observing and upholding our principles with respect to labour standards and human rights.

Definitions

Associate

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.

CEO

Means the chief executive officer, president or equivalent business head of a Sonic subsidiary.

Employee

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.

Sonic

'Sonic' means Sonic Healthcare Limited and its subsidiaries, being all companies within the Sonic Healthcare Group worldwide (including controlled joint ventures).

To whom does this policy apply?

This Policy applies across all Sonic subsidiaries as well as all Employees, Associates and Directors of those business units. Companies and joint ventures in which Sonic has a non-controlling interest are also encouraged to apply this Policy.

Community and stakeholder engagement

As a provider of essential healthcare services, Sonic is acutely aware of its impact within the communities in which it operates. Sonic is committed to engaging with stakeholders within these communities to ensure that it is listening to, and learning from, their views on how Sonic conducts its business, including specifically how this relates to matters of labour and human rights.

Commitment to local employment

Sonic is structured as a decentralised federation of medically-led practices. An outcome of this federated model is that Sonic is committed to supporting the local communities in which it operates through the priority given to local labour recruitment. To this end, all Sonic entities are expected to attempt, in the first instance, to source job applicants from the local community in which the business operates.

Commitment to diversity

As outlined within our Diversity Policy, Sonic Healthcare strives to maintain a healthy, safe and productive environment that is free from discrimination and harassment based on race, colour, deprived backgrounds, poor social status, religion, gender, sexual orientation, age, national origin or disability. In addition, Sonic is committed to equal employment opportunities and the continued development and implementation of initiatives to remove barriers that disadvantage any person or group, such that everyone is able to compete on equal terms.

Diversity is valued as it assists Sonic to meet its objectives, and ensures that its own people, at all levels, reflect the customers and the communities Sonic serves.

Freedom of association and collective bargaining

Sonic respects the rights of its employees to join or form a labour union without fear of harassment, intimidation or reprisal. The same applies to employees who elect not to join a union.

When dealing with legally recognised unions, Sonic is committed to facilitating constructive dialogue and bargaining in good faith with representatives of the employee group.

Workplace health and safety

Sonic is committed to guarding the health, safety and wellbeing of its Employees, Associates, contractors and visitors by preventing injuries and illnesses in the workplace, and ensuring working conditions are safe and hygienic.

Sonic commits to complying with all applicable health and safety laws and regulations in the jurisdictions in which it operates, including compliance with reporting requirements and maintaining a transparent process for identifying, assessing, and controlling modern day slavery impacts.

Sonic's Workplace Health and Safety Management System (WHSMS), Sonic's Workplace Health & Safety Policy and SonicSAFE Improvement Program give effect to this commitment, and include frameworks for consistent risk management strategies, continual assessment (and remediation) of potential hazards, and regular measurement of safety key performance indicators.

Child labour

The use of child labour is prohibited by Sonic. 'Child' is defined as any persons under fifteen years of age, unless a national or local law stipulates a higher minimum working age, in which case the higher age will apply. Sonic is committed to upholding the Children's Rights and Business Principles¹ through our involvement in the communities in which Sonic operates and in the communities where Sonic provides charitable assistance.

Employment of individuals under eighteen years of age (but over fifteen years of age and above the minimum working age) is permitted and appropriate in non-hazardous roles or roles that do not involve modern slavery.

1. Developed by UNICEF, the UN Global Compact and Save the Children, the Children's Rights and Business Principles are the first comprehensive set of principles to guide companies on the full range of actions they can take in the workplace, marketplace and community to respect and support children's rights.

Modern slavery

Sonic prohibits the causing of, use of, or contribution to, all forms of modern slavery, including but not limited to forced labour, bonded labour, slave labour, human trafficking, prison labour, servitude, forced marriage or deceptive recruiting for labour, services or any operations that link Sonic to modern slavery. All employment should be freely chosen, and no worker should be subject to the deprivation of personal freedoms or any treatment that is cruel or inhumane.

Compensation and employee conditions

Sonic operates in full compliance with employment laws and regulations in all jurisdictions in which it operates. This includes but is not limited to laws governing wages, working hours, overtime and statutory employee benefits.

The Company compensates employees competitively relative to the industry and respective local labour markets. Sonic is committed to ensuring that no employee is paid below the legal minimum wage.

'Respect for our People' forms part of Sonic's Foundation Principles. As part of this commitment, Sonic recognises its responsibility to ensure its people are able to enjoy a work-life balance and are provided with opportunities to develop professionally.

Reporting of non-compliance

Sonic's Foundation Principles, Code of Conduct, Whistleblower Policies and Core Values are tangible demonstrations of the Company's commitment to its people and the communities in which Sonic operates. Central to this commitment is fostering workplaces in which all employees are valued and respected.

If instances of non-compliance with this Policy are suspected, Sonic encourages reporting to an immediate supervisor or local CEO using formal reporting platforms. If circumstances deem this not appropriate, items of concern can be reported confidentially to the Business Assurance Manager and/or Sonic's Company Secretary in Australia.

Sonic encourages openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.

Remedy

We take seriously any allegations that human rights are not being properly respected. We seek to provide effective remedy if human rights are contravened.

Training and communication

This Policy is communicated to senior management in all jurisdictions and is made available on the Sonic Healthcare website and subsidiary intranet sites. It is the responsibility of senior management in each jurisdiction to ensure those reporting to them are made aware of, and understand, this Policy.

Additional training of senior management is provided where deemed necessary.