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Code of Conduct and Ethics



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Introduction

Sonic Healthcare (Sonic¹) is a trusted and respected healthcare company known for our culture of Medical Leadership and commitment to providing patients and treating doctors with the highest quality products and services. We retain that trust by always acting responsibly, respectfully and with absolute integrity.

This Code of Conduct and Ethics (the Code) describes our shared culture and the ways in which we demonstrate our individual commitment to our Core Values through our everyday behaviour in relation to:

- our colleagues
- Sonic, as a company
- our stakeholders and the communities in which we operate.

This Code sets the expectation that we treat everyone with respect and conduct Sonic's business safely, responsibly, ethically and legally. It reminds us to be guided by our Core Values when we make decisions, especially when we are faced with an ethical dilemma. The Code also describes our shared responsibility to speak up when we see behaviour that is inconsistent with the Code, and provides guidance on how we can raise concerns without fear of retaliation.

¹ Sonic means Sonic Healthcare Limited and all its subsidiaries, being all companies within the Sonic Healthcare Group worldwide (including controlled joint ventures).

Our Core Values

Sonic's Core Values are the five key principles that define our culture and underpin this Code:



Commit to service excellence

We willingly serve all those with whom we deal, with unsurpassed excellence.



Treat each other with respect and honesty

We strive to create a workplace where trust, team spirit and equity are an integral part of everything we do.



Demonstrate responsibility and accountability

Each of us must set an example, take ownership of each situation to the best of our ability, and seek help when needed.



Be enthusiastic about continuous improvement

We must never be complacent, and we must recognise limitations and opportunities for ourselves and processes and learn through them.



Maintain confidentiality

We must keep all information pertaining to patients, as well as professional and commercial issues, in strict confidence.

How does the Code apply to me?

This Code applies to everyone working in or for Sonic, regardless of location or entity. This includes directors, officers, employees, consultants, external collaborators and temporary personnel. We must all use our best efforts to comply with this Code whenever we are working within Sonic, representing Sonic externally, or acting on Sonic's behalf.

Everyone is expected to read, understand and adhere to this Code, which requires us to:

- act with honesty and integrity
- obey the law
- treat others with respect
- ask questions if we're unsure of the right course of action
- speak up and report violations
- co-operate with investigations.

If we are in a leadership or management position, we are also expected to:

- ensure everyone in our team reads and understands the Code
- lead by example and demonstrate the conduct we wish to see within our team
- cultivate an open-door culture in which our team feels comfortable to ask questions and express concerns about matters relating to this Code
- embrace initiatives and training that support the principles outlined in the Code
- prevent retaliation against those who voice concerns or report breaches of the Code.

Key takeaways

Breaching this Code of Conduct can lead to serious consequences, including disciplinary actions up to and including termination of employment, legal prosecution and fines. Breaches can also impact the organisation through legal liabilities, financial losses and damage to our public image, ultimately undermining the trust and efficiency of our workplace.

Reporting your concerns

If we know or suspect that someone has behaved in a way that is inconsistent with the Code, we can raise our concerns through one of the channels below. By speaking up, we help each other to address issues proactively, prevent further misconduct and limit any negative impacts.

Whenever we say 'report' in this Code, we mean 'sharing our concerns' in one of the ways shown below.



Who investigates my report?	I want to report a concern but I'm afraid I will be retaliated against.	Can I report anonymously?
Your report will be assigned to an appropriate person to investigate, based on the nature of the report. Each report is taken seriously and appropriately investigated.	Sonic does not tolerate retaliation against the whistleblower for reporting a genuine concern. Your report will be handled discreetly and in a confidential manner, to the extent reasonably possible.	Yes, you can contact the whistleblower hotline anonymously.

Related policies

Whistleblower Policy

Sonic's commitment to you

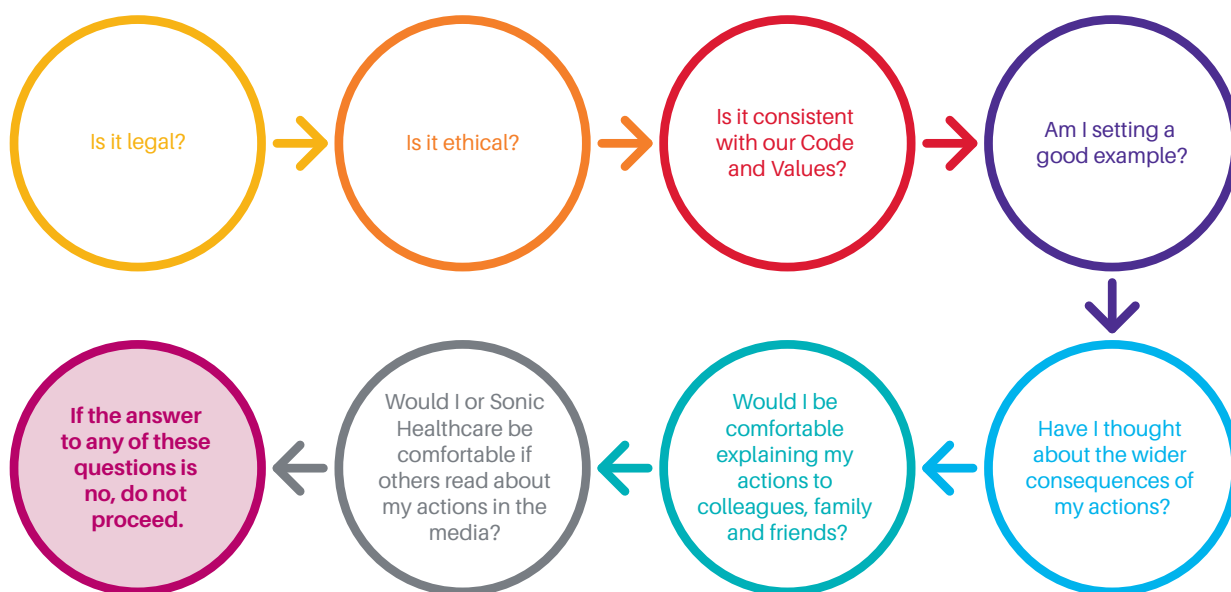
When you are deciding whether to report a concern, it is important for you to know:

- Sonic takes allegations of Code violation seriously, and will investigate concerns promptly.
- Sonic will keep your identity (as the person reporting concerns) confidential to the extent reasonably possible, keeping in mind our need to investigate the reported matters and the requirements of any applicable laws.
- Sonic does not permit retaliation against anyone who reports a concern in good faith. Any employee who retaliates against someone involved in reporting or investigating a concern will be subject to disciplinary action. This may include termination of their employment.
- You should not conduct your own investigation before deciding to report. Investigations often involve complex legal issues, and acting on your own may compromise an investigation and negatively affect both you and Sonic.

Making ethical and responsible decisions

This Code offers guidance on a range of topics, but we may still find ourselves in situations where it is not clear what the right thing is to do. When this happens, we are expected to use good judgment and common sense, and to adhere to the spirit of the Code.

- Ask for specific guidance if you aren't certain, and speak up when something doesn't seem right.



If you're not sure, ask for help: Talk to your manager or supervisor, another senior manager or people manager, or a member of the legal or compliance team.

Our obligations to each other

This section of our Code of Conduct emphasises our commitment to each other, outlining the responsibilities we share in creating a safe, inclusive, and respectful workplace. By upholding these values, we not only enhance our collective performance but also cultivate a culture where every individual feels valued, empowered and proud to be part of our mission to provide the highest quality, patient-focused healthcare services.

Treat others with respect

Treating each other with respect is the key to creating a productive, inclusive and secure workplace. We do not engage in, or tolerate, any behaviours that may cause someone to feel threatened or unsafe, such as bullying, cyberbullying, hazing, hostility, verbal or physical assaults, intimidation or harassment. Harassment includes any unwelcome conduct that creates an intimidating, hostile or offensive work environment, causes work performance to suffer, or negatively affects job opportunities.

Key takeaways

- Always treat everyone with whom you come in contact – colleagues, patients, referring doctors, suppliers, stakeholders and others – with dignity and respect.
- Do not engage in any form of offensive or intimidating conduct, such as the use of threats or abusive language, bullying, sexual harassment or violence.
- Remember that what constitutes ‘harassment’ is judged by the impact of someone’s behaviour on others, regardless of whether the impact is intended or not.

Related policies

Labour Standards and Human Rights Policy

Promote diversity, equity and inclusion

We know that diversity in our workforce builds a stronger and smarter organisation. We want to capture the inherent value in our differences and the unique experiences and perspectives we each bring to the workplace. We believe that everyone should receive fair and just treatment and be given an equal chance to succeed. We do not tolerate discrimination on the basis of ethnicity, gender, age, religion, disability, sexuality, beliefs or any other proscribed point of difference.

Key takeaways

- Play an active role in creating an inclusive environment in which different backgrounds and viewpoints are taken into account and valued.
- Be aware of unconscious bias and take steps to ensure employment candidates are assessed on the basis of merit alone.
- If you are a manager or supervisor, ensure that complaints are handled promptly, impartially and effectively.

Speak up!

If you or someone else experiences discrimination or exclusion, report it to the appropriate person.

Related policies

Diversity Policy

Maintain a safe work environment

Everyone has the right to work in an environment in which they feel safe and secure – physically, psychologically and socially. Sonic is committed to promoting workplace health and safety (WHS) and to ensuring the welfare of our colleagues, visitors, contractors, consumers and the communities in which we operate.

Key takeaways

- Take responsibility for yourself, our customers and any visitors you bring on-site.
- If you see something unsafe, stop and do something about it.
- Report potential hazards, unsafe practices or installations to the facility or Health, Safety and Environment (HSE) Manager.
- Report accidents, near misses and work related injuries and illness to your manager.
- Know how to use and maintain equipment relevant to your work, and wear any necessary personal protective equipment.
- Know and adhere to the WHS policies and procedures that apply in your workplace, including emergency response plans.
- Do not work under the influence of alcohol, illegal drugs and controlled substances (including prescribed medications that may impair your capacity), whether on or off Sonic's premises.
- Know and adhere to applicable safety rules and regulations, participate in safety training and follow all applicable emergency procedures in case of serious incidents (fires, attacks, etc.).

Speak up!

If you experience or witness anything that could result in the workplace being unsafe or insecure in any way (physically, psychologically or socially), report it to the appropriate person.

Related policies

Health, Safety and Wellbeing Policy

Uphold human rights

Sonic is committed to respecting human rights and upholding labour standards. We consider that modern slavery and human trafficking are completely unacceptable, whether in our supply chain or any other part of our operations. We expect everyone working within Sonic to comply with the standards outlined in Sonic's Labour Standards and Human Rights Policy.

Related policies

Labour Standards and Human Rights Policy

Our obligations to customers, suppliers and the community

Sonic Healthcare's core philosophy of Medical Leadership places patient wellbeing above all else, guiding every decision and action we take. We are unwavering in our commitment to upholding the highest standards of quality, compliance, clinical care and ethical conduct in all aspects of our operations.

This section of our Code of Conduct details our responsibilities as healthcare workers to provide compassionate care, maintain privacy and confidentiality, engage in ethical research, compete fairly, and uphold integrity by avoiding bribery, corruption, conflicts of interest, and by engaging responsibly with the community. By adhering to these principles, we not only fulfill our legal and ethical obligations but also build trust and foster a positive impact on society.

Take good care of our patients

As individuals, we all know how it feels to be a patient, or to have someone we love require medical care. Sonic is committed to delivering healthcare services in a way that respects the rights of the patient, the role of their treating practitioners, and the interests of the communities we serve. Each of us has a role to play in ensuring this happens, and those of us who are working directly with patients have additional obligations. For those of us handling patient specimens in our laboratory operations, it is prudent to regard each specimen as if it were the patient.

Key takeaways

If you are directly involved in the delivery of healthcare services, you must (as appropriate to your role):

- maintain the qualifications, skills, competencies, registrations and licences necessary to provide the type of healthcare you have been engaged to deliver
- prescribe or recommend only those investigations, treatments or appliances that are in the best interests of, and serve the needs of, the individual patient
- accept the patient's right to make informed choices in relation to their own healthcare, and refrain from attempting to dissuade a patient from seeking or continuing medical treatment
- assist a patient to find other appropriate healthcare services, if required and practicable
- provide health services in a manner that is culturally sensitive to the needs of the individual patient
- communicate and co-operate with colleagues and other health service providers and agencies in the best interests of their patients
- take appropriate and timely measures to prevent harm to patients and take all necessary actions to minimise harm if an adverse event occurs whilst providing treatment or care
- provide health services in accordance with all relevant jurisdictional laws and regulations
- comply with all privacy laws relevant to patients' personal (including health) information
- maintain accurate, legible and up-to-date clinical records for each patient consultation or encounter and ensure that these are held securely and protected from unauthorised access or disclosure.

You must not:

- misinform, misrepresent or otherwise make unsubstantiated claims about the products or services we provide or the qualifications, training or professional affiliations you hold
- provide health services while physically or mentally impaired or while under the influence of any prescribed or unlawful substance
- exploit patients in any way, nor ask patients to give, lend or bequeath money or gifts that will benefit you directly or indirectly
- accept or offer financial inducements or gifts as a part of patient referral arrangements with other healthcare workers
- engage in an inappropriate relationship with a patient.

Respecting the privacy of others

Maintaining the confidentiality of sensitive patient information is a fundamental responsibility of healthcare workers and a Sonic Healthcare Core Value. We respect the privacy of our patients, other healthcare professionals, customers, colleagues, business partners and research participants, and are committed to handling personal information responsibly and in strict compliance with all applicable laws and ethical standards.

Key takeaways

- Know and follow Sonic's internal policies and procedures when you are collecting, accessing, using, disclosing, transmitting or storing personal information.
- Exercise discretion when interacting with patients and healthcare workers to protect the confidentiality of sensitive personal information.
- Only access personal information to the extent required to carry out your delegated duties, and within the scope of your authority.
- If you are unsure, ask your manager or legal team for help.
- If you manage a team that has responsibility for handling personal information, ensure your team have read and understand the relevant policies and procedures applicable in your location.

Speak up!

If you become aware of any incident that may involve unauthorised access to, use or disclosure of, personal information, including health information, report these incidents immediately to your manager or nominated privacy officer.

Related policies

Privacy Policy

Acceptable Use Policy

Commit to quality and safety

Every user of our services – doctors, patients, hospitals and other healthcare facilities – expects us to provide safe, high quality products and services, and we each have a role to play in ensuring that we meet their expectations.

Sonic is committed to complying with laws relating to product quality and safety, and to consistently and proactively monitor the safety, quality and performance of our products. We are also committed to complying with the requirements for reporting adverse events and to appropriately managing and reporting complaints about our products and services.

Key takeaways

- Comply with all quality standards and practices relevant to your role.
- Uphold ethical, scientific and clinical standards in all aspects of your work.
- Where you are engaged in research or development activities, comply with all relevant laws and regulations.
- Take steps to ensure that our business partners also adhere to our high-quality standards.
- Know and comply with local policies and procedures regarding the reporting of adverse events and product complaints.
- If you manage a team that has responsibility for the delivery of health services or health products, ensure your team is familiar with these expectations, and has read and understood the relevant policies and procedures applicable in your location.

Speak up!

If you observe or experience any issues regarding the safety, quality and performance of our products and services, report it to the appropriate person.

Compete fairly

Sonic operates fairly and honestly, and supports laws promoting fair competition and trade practices. We build our competitive advantage by innovating and providing high-quality products and services, without engaging in unethical or illegal business practices. We do not disparage our competitors, impose unlawful restrictions on our customers or suppliers, or mislead others. We do not attempt to distort the market or abuse our position in it by entering into improper agreements or colluding with competitors.

Key takeaways

- Gather competitive intelligence lawfully and ethically – use public or other permitted sources and be honest about who you are and who you work for.
- Respect the confidentiality obligations of third parties, including the ongoing confidentiality obligations of employees with respect to their former employers.
- Deal honestly and fairly with our customers – promote positive customer relationships and never mislead or deceive customers (including by omission) when marketing our products and services.
- Be truthful about our company and what we sell – do not make claims you cannot substantiate, and do not make inaccurate remarks about our competitors or erroneous comparisons between their products and ours.
- Deal honestly and fairly with our suppliers – promote positive business relationships and never mislead or deceive suppliers (including by omission) when engaged in commercial dealings with them.
- Be cautious when engaging with our competitors, including at industry events and as part of any industry association.
- Seek legal advice before entering into arrangements or understandings that may have the effect of substantially lessening competition.
- In gathering competitive information, make sure you:
 - review the information to determine whether it is highly sensitive or marked confidential
 - ask if anyone has an obligation to keep the information confidential
 - consult with company legal counsel, if necessary
 - document how you handled the information.

Speak up!

If you become aware of any behaviours or arrangements that may not be consistent with competition or consumer laws or this Code, report it to your CEO, the legal team in your business division or Sonic's General Counsel.

Related policies

Supplier Policy

Do not offer inducements for patient referrals

All of our engagements with healthcare providers must be transparent and appropriate. We believe in building relationships with our customers by providing industry leading quality, innovation and service, not by offering improper inducements. We do not engage in any conduct that is intended to, or has the appearance of, improperly influencing a healthcare provider's judgement.

Key takeaway

- Do not offer or provide anything of value to a referrer with the intent, or perception of intent, to improperly induce or reward.

Do not engage in bribery or corruption

At their core, anti-bribery and anti-corruption (ABAC) laws and regulations make it illegal to offer, pay, ask for, or receive anything of value in return for inappropriate advantages. To comply with ABAC laws locally and internationally, Sonic prohibits all forms of corrupt business practice, including bribery, kick-backs and other unlawful payments, in both the public (government) and private (commercial) sectors. Sonic also prohibits facilitation (or 'grease') payments, being a small payment made to a government official to speed up routine government actions like processing paperwork, delivering mail, installing phones or turning the power on. These obligations extend to any third parties we engage to support our business, regardless of where they are located in the world.

Key takeaways

- Comply with anti-bribery and anti-corruption laws wherever you do business.
- Do not make facilitation payments, regardless of the amount and regardless of the customs in the country.

Speak up!

If you have experienced or suspect that others may have engaged in any corrupt practices, report it immediately to your CEO or legal team.

Learn to spot a bribe

Bribes come in many forms, and they are not always obvious. A gift, the promise of a job, the offer of a trip, or a charitable contribution could all be considered bribes if offered in exchange for any decision or favourable treatment.

Related policies

Anti-bribery and Corruption Policy

Be careful about giving or receiving gifts and hospitality

Sonic values the relationships we have built with our customers, suppliers and other business partners, and it is important that these relationships remain positive and ethical. Although the exchange of gifts and entertainment in business can be a traditional way to express gratitude and build strong relationships, such exchanges should never be used to gain an unfair advantage or inappropriately influence a commercial decision. Excessively generous gifts and hospitality can create a real or perceived conflict of interest.

Key takeaways

- It is NEVER acceptable to:
 - accept gifts of cash or cash equivalents (e.g. gift cards) for yourself, your partner or other family members
 - offer gifts or entertainment to government officials
 - offer or accept gifts or hospitality that are against the law.
- Never exchange gifts or entertainment if it could be perceived as an attempt to improperly influence a business decision.
- Where the law and Sonic policy permit you to offer or accept a gift or hospitality, be sure that the gift or hospitality supports a legitimate business purpose and is reasonable and appropriate under the circumstances.
- Ensure that anything of value that is offered or accepted by Sonic is accurately and completely recorded in Sonic's payment/expense accounts.
- Never accept an offer from a supplier (or potential supplier) to provide sponsorship, or to fund travel and accommodation for you to attend or speak at conferences or similar, without approval from your CEO.
- If you are not sure whether our policies permit you to offer or accept something, ask for help.
- Obtain approval from your senior manager or CEO before offering or accepting any gift (including hospitality or entertainment) worth the equivalent of more than A\$250, or as specified in the relevant local policy in your area.
- Remember that our business partners have their own rules on receiving gifts and hospitality. Never offer anything that would violate those rules and put the business partner in a potentially uncomfortable position.

Speak up!

If you have, or suspect that others may have, offered or received gifts in violation of this Code, report it to your manager or CEO.

Related policies

Supplier Policy



Can I ever accept a gift?

✓ A gift may be acceptable if it is:

- modest in value
- a token item like a pen, t-shirt or logo-branded item
- symbolic, like a modestly-priced, inscribed trophy or statue
- approved for a large group of employees

✗ A gift is not acceptable if it is:

- given in exchange for some action
- any value of cash or a cash equivalent, like a gift card or gift certificate
- in the form of stocks or securities
- more than modest in value
- not available to others, like a special discount
- given around the time of a potential transaction

Comply with international sanctions and trade restrictions

Many countries restrict the movement of information, products and services across borders. In the countries in which we work, we comply with all laws and rules relating to trade sanctions, export controls and boycotts.

Key takeaways

If your work involves managing cross-border transactions involving goods and services:

- Understand and comply with all applicable export laws and regulations, trade sanctions and import obligations.
- Obtain, retain and communicate correct customs and export control classification on all goods and software moved internationally.
- Check the applicable trade rules and always apply them when arranging any cross-border transactions, including financial transactions, technology transfers, transactions that are free of charge, returns or hand-carried goods.
- Do not deal in a sanctioned country or with a sanctioned party unless specifically authorised in accordance with our procedures.

Support sustainability

As members of society, Sonic aims to protect the environment for future generations. We develop solutions that promote long-term sustainability, with the goal of reducing our environmental impact by reducing our carbon footprint, waste and water usage and by making efficient use of natural resources. We recognise that everything we do, whether individually or as a group, whether small or large, plays a crucial role in achieving our sustainability goals.

Key takeaways

- Comply with all environmental laws and regulations relevant to our facilities.
- Reduce waste and water usage wherever possible.
- Look for opportunities to reduce our carbon footprint.

Related policies

Environmental Policy

Engage appropriately with the community

We recognise that, in our position as a trusted healthcare provider, we have a significant impact on the communities in which we operate. Our success is intertwined with the wellbeing and vitality of these communities. Therefore, community engagement is a fundamental aspect of our commitment to responsible and ethical conduct.

Key takeaways

- Treat all community members with respect, regardless of their personal characteristics, background or identity.
- Comply with all local laws and regulations governing our operations and community engagement efforts.
- Be open and honest in communications with the community (and stay within the scope of your authority to communicate).
- Never solicit customers, suppliers or partner organisations for company-sponsored donations or sponsorships.

Know the rules for political activities, donations and lobbying

Sonic plays a pivotal role engaging with government bodies and officials to advocate for legislation, regulations and policies that enhance healthcare access and quality, patient wellbeing and quality of life. However, Sonic always remains politically impartial and does not donate to political parties.

Sonic respects employees' personal rights to participate in the political process and to engage in political activities of their own choosing. However, when we, as staff, get involved by contributing our personal time or money in the civic process, we need to make it clear that we are acting on our own behalf and not on behalf of Sonic. We must never use Sonic's name, reputation or resources (including time at work, work email, devices or company funds) to support or oppose political candidates, parties or campaigns, or to further our own political activities or interests.

Key takeaways

- Obtain approval from Sonic's Global CEO before undertaking any lobbying activity on Sonic's behalf. This includes contacting government officials on Sonic's behalf in relation to proposed changes to, or concerns about, legislation, regulations, policies or programs.
- Ensure that any lobbying activity conducted on Sonic's behalf complies with all applicable laws.
- Never use Sonic's name, reputation or resources, including time at work or email, for your personal political activities.
- When you contribute your own name, time or money in the civic process, make it clear that you are acting on your own behalf and not on behalf of Sonic.

Clinical research

Sonic is committed to conducting clinical research with the highest ethical standards, ensuring the safety and wellbeing of participants, maintaining scientific integrity, and fostering continuous improvement and collaboration. Clinical research must adhere to national and international regulations and be conducted only with appropriate ethical and regulatory approvals.

Key takeaways

- The design and conduct of clinical trials must comply with all relevant regulations and ethical standards, particularly with respect to requirements for consent.
- Design protocols to ensure the safety of participants, minimise risks, maintain confidentiality, and select participants fairly.
- Follow research protocols strictly, report findings accurately, and submit results for peer review.
- Researchers must participate in regular ethical reviews, audits, and ongoing training to enhance research practices.
- Work with external researchers and institutions to advance scientific knowledge and improve research quality.

Speak up!

Report any suspected misconduct or ethical breaches immediately and maintain open communication with all stakeholders.

Protect animal welfare

Sonic is committed to advancing medical knowledge and improving patient care through ethical and innovative practices. We firmly believe in the importance of animal welfare and have adopted a policy that strictly prohibits the use of animals in any of our research activities.

Our obligations to Sonic Healthcare

In reflecting and exemplifying our core philosophy of Medical Leadership, we each play a vital role in upholding the integrity, reputation and success of our organisation. This section of our Code of Conduct outlines our obligations to our company, emphasising the importance of acting with loyalty, honesty and accountability in all our professional endeavours.

Comply with laws and regulations

Sonic's reputation as a trusted healthcare provider depends on our people delivering services, information, advice, results and data of the highest quality and conducting our business with the utmost integrity. This means we must always act in strict accordance with relevant legal and regulatory frameworks and professional standards, including those governing clinical practice and research.

Sonic operates in numerous geographic and legal jurisdictions. Regardless of where we are located, we follow the 'stricter-rule' approach. This means that if the local law is stricter than the terms set out in the Code, we observe the stricter local law; and if the terms set out in the Code are stricter than the local law, we observe the stricter terms in the Code. If there is an irreconcilable difference between the Code and the local law, we must comply with the local law.

Key takeaways

- Always comply with local and international laws, regardless of local customs and cultural practices.
- Follow the 'stricter-rule' approach.

Manage conflicts of interest

We must always act on the basis of sound business judgment, without being motivated or influenced by our personal interests. A conflict of interest occurs when our personal, professional or financial interests could interfere with, or be perceived to interfere with, our responsibilities to Sonic and our stakeholders. Some examples of potential conflicts of interest include:

- making business-related decisions when dealing with someone who is a friend, romantic partner or family member (whether as a customer, supplier or employee)
- seeking or accepting any material personal benefits or favours in connection with your position with Sonic (also see the section above regarding offering and receiving gifts under 'Our obligations to customers and suppliers')
- using your position with Sonic, or Sonic's time, assets, confidential information or other resources, for your own benefit or for the benefit of a relative or related party
- working for, or acting as a director of, a company that is a competitor, customer or supplier of Sonic
- holding, or someone related to you holding, a direct or indirect financial or other interest in a business that is a competitor, customer or supplier of Sonic.

Key takeaways

- Avoid conflicts of interest, as far as reasonably possible.
- If you have an actual, potential or perceived conflict of interest at any time during your work with Sonic, you must promptly disclose it in writing to your manager.
- Always act on the basis of sound business judgment.

Speak up!

If you become aware of any undeclared (or potentially undeclared) conflict of interest, report it to your manager or other appropriate person.

Remember!

Having a conflict of interest is typically not a Code violation, but failing to disclose it is.

Act within your delegation of authority

Sonic's Board of Directors has authorised our Global CEO to make certain decisions and to carry on the day-to-day operations of the company. The Global CEO has delegated certain aspects of that authority to members of the Global Executive Team and to the divisional CEOs, and so on. This process of transferring authority is known as 'delegation of authority'. All Sonic entities operate on this principle.

Key takeaways

- When you are making decisions or doing things on Sonic's behalf, make sure you are acting within the scope of your delegation of authority.
- Do not make commitments or undertakings on behalf of Sonic unless you have the delegated authority to do so.
- If you are a manager, inform your team about the limits of their authority.

Speak up!

If you are unsure about the scope of your authority, ask your manager for clarification.

Do not make public statements without authority (including on social media)

We want to make sure that information shared about Sonic is consistent, accurate and complete. We have appointed specific individuals to serve as our official company spokespeople to ensure this happens.

Key takeaways

- Do not make any public statements on Sonic's behalf, unless you are authorised to do so. This includes on social media.
- Refer all requests for comment by the media to your CEO (who should review the matter with the relevant Communications department).
- Obtain approval from your manager before accepting any speaking engagement or public communication related to Sonic's business.
- When using your personal social media, be clear that your opinions are yours, not Sonic's.
- Never publish or post any confidential information about Sonic, our employees, customers or suppliers without prior authorisation.

Speak up!

If you become aware of public statements that appear to be in violation of this Code, report it to your manager or the relevant Communications department.

Maintain confidentiality of company information

Sonic respects and maintains the confidentiality of information that comes into our possession – whether it belongs to Sonic, our customers or suppliers, or any other third party. We recognise that confidential information – including business plans, designs, reports, financial information, customer data, know-how, processes and procedures – has value and needs to be protected.

Key takeaways

- Comply with the law.
- Adhere to any contractual obligations applicable to third party information.
- Collect, access, use and process confidential information for legitimate business purposes only.
- Only share confidential information with those who have a legitimate business need to know it.
- Take steps to prevent unauthorised access or disclosure of information (e.g. through use of password protection, restricting folder access, not leaving information lying around in hard copy, and not discussing it in earshot of others).
- Remember that your obligations of confidentiality continue, even if you leave the company.

Speak up!

If you become aware of any unauthorised access, disclosure or use of confidential information, report it to your manager.

Related policies

Acceptable Use Policy

Protect company assets

Sonic's assets include the tools we use in our work each day: the buildings in which we work, the equipment and supplies we use to provide our services, the intellectual property and ideas we develop, the data and information we collect, the vehicles we drive and the computers and mobile devices we use to do our jobs. We only use these assets for legitimate business purposes, we always handle them with care and we vigilantly protect them from loss, theft, fraud and misuse.

Key takeaways

- Only use Sonic's assets and resources for legitimate business purposes.
- Comply with Sonic's policies and use good judgement when using assets. Remember that your use of assets may be monitored (where the law permits).
- Report any equipment that is lost, stolen, damaged, unsafe or needing repair.
- Do not lend, sell or give away Sonic's assets without permission.
- All intellectual property you create as an employee is owned by Sonic. That ownership continues even if you leave the company.
- Take care not to infringe the intellectual property rights of others (including in materials that are publicly available).
- Do not engage in personal activities during work hours that interfere with, or prevent you from, fulfilling your responsibilities at work.

Speak up!

If you suspect there has been any misuse, fraud or theft of Sonic's assets, report it to your manager or other appropriate person.

Related policies

Acceptable Use Policy

Avoid insider trading

The law and Sonic policy prohibit us from trading in Sonic securities (shares/options) or the securities of other companies (such as our customers or suppliers) when we have 'inside information'. 'Inside information' means information not available to the public that is relevant to the price of the securities. Examples include: news about acquisitions or significant investments, new brand launches or changes in business relationships, significant cybersecurity risks or incidents, sales or financial results and significant management changes.

Trading in securities when you possess inside information is sometimes referred to as 'insider trading'.

Key takeaways

- Comply with applicable laws and internal policies relating to the prevention of insider trading.
- If you have inside information, keep the information confidential and do not use it to trade securities – whether directly or indirectly, such as through family members, friends or colleagues.
- Do not share confidential information with anyone else in order to assist them to trade securities.
- If you are unsure as to whether you have inside information, do not trade or share that information until you have consulted with Sonic's Company Secretary.

Speak up!

If you suspect that any insider trading has occurred, or is likely to occur, report it to Sonic's Company Secretary.

Related policies

Securities Trading Policy

Maintain accurate records

Accurate records are essential for us to make good business decisions. We are also responsible for keeping accurate records for the benefit of our shareholders, business partners and various government agencies who rely on our business records and disclosures to make informed decisions themselves.

Key takeaways

- Know and follow our records management and records retention policies.
- Use good judgement when creating a record, remembering that it may become subject to public disclosure (through litigation, regulatory investigations or the media).
- Never delete or destroy information that may be relevant to current or threatened litigation.
- If you are responsible for maintaining company records, ensure the information is full, fair, accurate, timely, understandable and transparent, and complies with all applicable legal and regulatory requirements.
- If you are responsible for maintaining Sonic's financial records or accounts, take steps to ensure that they are kept securely.

Review of the Code

Sonic will review this Code periodically to confirm that it is operating effectively and to consider whether any changes are required. Sonic may amend this Code from time to time.