

December 2020

# Global Whistleblower Policy

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## Introduction

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 is committed to maintaining high ethical standards and conducting business with honesty and integrity.

Consistent with our Core Value of 'Demonstrating responsibility and accountability', Sonic supports the reporting of misconduct, illegal acts or any improper state of affairs relating to Sonic's businesses.

Our Global Whistleblower Policy (Policy) has been put in place to support people to raise concerns about wrongdoing within Sonic, without being subjected to victimisation, harassment or discriminatory treatment.

To the extent anything in this global Policy is in conflict with a provision of a national whistleblower policy in one of Sonic's countries of operation, the national policy takes precedence as it will have been designed to meet the specific legal and cultural requirements of that jurisdiction. In general, however, the national policies reflect the intent of this global Policy.

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## Who is an eligible whistleblower under this Policy?

A person is eligible for protection as a whistleblower under this Policy if they are or have previously been:

- an officer of Sonic
  - an employee of Sonic (whether permanent, part time, fixed-term or temporary)
  - an individual who supplies goods or services to Sonic (or an employee of a person who supplies goods or services to Sonic) including contractors, consultants and secondees
  - a relative, spouse or dependent of any of the above persons; or
  - a dependant of a spouse of any of the above persons
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## What should be disclosed under this Policy?

Information should be disclosed under this Policy if the discloser has reasonable grounds to suspect that the information:

- concerns misconduct or an improper state of affairs or circumstances in relation to a Sonic entity or business; or
- indicates that Sonic, or any employee or officer of Sonic, has engaged in conduct that:
  - constitutes an offence against, or a contravention of, any relevant law; or
  - poses a significant risk to public safety

Examples of information that should be disclosed include:

- dishonest, fraudulent or corrupt conduct, including any activity that would constitute a breach of Sonic's Anti-bribery and Corruption Policy
  - unethical or other serious improper misconduct, such as dishonestly altering company records or data, submitting fraudulent claims to payers or adopting questionable accounting practices, which would constitute a breach of Sonic's Code of Conduct
  - concerns of working practices or situations that would be considered a breach of Sonic's Labour Standards and Human Rights policy, especially any activity or situation that could be considered modern slavery
  - illegal activity, such as theft, violence, criminal damage to property or other breaches of law
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## What should not be disclosed under this Policy?

A disclosure about a personal work-related grievance does not qualify under this Policy. A personal work-related grievance is generally one about any matter in relation to the discloser's employment, or former employment, having, or tending to have, implications for the discloser personally.

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Examples of personal work-related grievances include:

- an interpersonal conflict between employees, including complaints of bullying, discrimination and harassment
- a decision relating to engagement, transfer or promotion
- a decision to suspend or terminate, or otherwise to discipline or performance manage.

There are, however, certain personal work-related grievances that may still qualify under this Policy. This is the case where the information:

- concerns a contravention, or an alleged contravention, of the prohibition against victimisation or threatened victimisation under this policy
- has significant implications for Sonic that do not relate to the discloser; or
- concerns conduct, or alleged conduct, that:
  - constitutes an offence against, or a contravention of, relevant law; or
  - poses a significant risk to public safety.

If a potential disclosure relates to a personal work-related grievance and does not have any of the characteristics listed above, you should follow the procedures set out in the Sonic Healthcare Code of Conduct.

A person who knowingly makes a false disclosure or makes a disclosure with malice and without having reasonable grounds to suspect that the disclosure is appropriate under this Policy will not qualify for protection. Sonic personnel may also be subject to disciplinary action for making such false or malicious disclosures.

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## To whom should a disclosure under this Policy be made?

The primary person authorised by Sonic to receive disclosures under this Policy is the Whistleblower Protection Officer, who is contactable in person or by email or phone at:

**Address**            Sonic Healthcare  
                          Level 22, Grosvenor Place,  
                          225 George St,  
                          Sydney NSW 2000  
                          Australia

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**Email**                wpo@sonichealthcare.com

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**Telephone**        1800 318 041 (within Australia)  
                          +61 1800 318 041 (outside Australia)

Alternatively, you may make your disclosure to:

- the Chief Executive Officer of Sonic Healthcare Limited
- the Chief Executive Officer (or equivalent) of a Sonic business or division
- Sonic Healthcare Limited's Chief Medical Officer or Chief Business Officer
- a Director or Company Secretary of Sonic Healthcare Limited.

Lastly, you may make a disclosure to Sonic Healthcare's external auditor, whose contact details can be found in Sonic Healthcare's latest annual report. Sonic Healthcare's external auditor is PricewaterhouseCoopers Australia.

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## Anonymous disclosures

Under this Policy, disclosures may be made anonymously. However, anonymous disclosures may not be dealt with as effectively as direct reports, as Sonic will be unable to obtain additional information from an anonymous whistleblower.

All whistleblowers who disclose their identity while making a relevant disclosure will be afforded confidentiality protections in respect of their identity as outlined below.

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## Protections for whistleblowers

Sonic is committed to ensuring that the confidentiality of any eligible whistleblower's identity is safeguarded and the whistleblower is protected from retaliation or victimisation.

### Confidential information

Strict confidentiality obligations apply in relation to any relevant disclosures. The identity of, or any information that may lead to the identification of, the whistleblower (Confidential Information) may only be disclosed if:

- the whistleblower consents to the disclosure or
- the disclosure is made to:
  - a relevant regulatory body or the police; or
  - a lawyer for the purposes of obtaining advice or legal representation in relation to the operation of any applicable whistleblower law; or
- the Confidential Information disclosed is not of the identity of the whistleblower and:
  - the disclosure is reasonably necessary for the purpose of investigating the disclosure; and
  - Sonic has taken all reasonable steps to reduce the risk that the whistleblower will be identified.

### Protection from legal action

Eligible whistleblowers who make a relevant disclosure under this Policy are protected from certain legal action taken by Sonic because of the disclosure, including:

- civil and administrative (including disciplinary) action against the whistleblower
- contractual action, including termination of a contract on the basis that making a disclosure is a breach of that contract.

### Protection against detriments and threats

Under this Policy a Sonic Director or employee (the first person) must not:

- engage in conduct that causes any detriment to another person (the second person) because that first person believes or suspects that the second person or any other person made, may have made, proposes to make, or could make, a relevant disclosure under this Policy; or
- make a threat, whether express or implied, conditional or unconditional, intentional or reckless, to cause any detriment to the second person because the second person or another person has made, or may make, a relevant disclosure.

'Detriment' includes dismissal, disciplinary action, injuring an employee in their employment, altering an employee's position or duties to their disadvantage, harassment or intimidation of a person, discrimination between an employee and other employees of the same employer, damage to a person's property, reputation, business or financial position, and any other damage to a person.

### Support and fair treatment

Through this Policy, Sonic is committed to ensuring all personnel feel supported and able to raise issues that relate to any misconduct or improper state of affairs or circumstances within Sonic and its businesses.

Sonic will treat a disclosure that meets the criteria under this Policy as a protected disclosure, even if any subsequent investigation finds no wrongdoing.

Where a protected disclosure is made, Sonic will repeat the requirements of, and protections contained in, this Policy with any person concerned in the investigation of the disclosure.

Investigations into protected disclosures will be conducted in a procedurally fair and confidential manner. Sonic will have regard to the protections afforded to a whistleblower and the privacy and fair treatment of persons referred to in the disclosure, including those to whom the disclosure relates.

Sonic will determine whether any disciplinary outcomes or other remedies are appropriate after an investigation into a protected disclosure is completed.

Sonic will not tolerate any reprisals or threats of reprisals made against whistleblowers, and will take appropriate steps to protect whistleblowers from such retaliation. This may include conducting an investigation into the alleged reprisal, where appropriate.

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## Investigation process

Sonic takes all relevant disclosures seriously.

Upon receiving a disclosure, Sonic will first make preliminary enquiries. Depending on the nature of the disclosure, this preliminary enquiry may take approximately 10 business days to complete, but Sonic will endeavour to complete the enquiries promptly.

Based on that preliminary assessment, and depending on the nature of the matter, Sonic will further assess, inquire into, investigate or take other action in response to the disclosure. Sonic may deal with or investigate the disclosure internally or refer it to an appropriate external person for investigation. The timeframe in which Sonic will deal with the disclosure will vary depending on a number of factors, including the nature of the disclosure. Typically, Sonic expects it will take four to eight weeks to conduct any investigation.

The referral of a disclosure for investigation will be done in accordance with the confidentiality obligations that Sonic owes to the whistleblower. If compliance with Sonic's confidentiality obligations will result in the inability to conduct a fair inquiry or investigation, the whistleblower will be informed in advance of being identified.

Sonic will keep the whistleblower informed of the progress of the matter and its expected timescale through regular updates, provided that it can contact the whistleblower, including through anonymous channels. However, confidentiality concerns, if any, may prevent Sonic from providing specific details, including as to the investigation or any disciplinary action taken as a result. All staff should treat any information about the matter and process as confidential. The Sonic Board of Directors will be informed of all material incidents reported under this policy.

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## Accessibility and review of this Policy

This Policy is available via Sonic's website at

<https://www.sonichealthcare.com/corporate-responsibility/policies/>

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