

# LIFE HEALTHCARE GROUP

THIS IS  
HOW  
WE DO  
BUSINESS.

CODE OF CONDUCT

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# A WORD FROM THE CHAIRMAN

## Message from the **CHAIRMAN**

***Mustaq Brey - Chairman***

***In today's global environment our sustainability as an attractive stakeholder proposition, whether for our investors, customers, patients, staff, operating doctors or other colleagues, starts with the way in which we have regard for our impact on society beyond our financial performance. The best performing companies recognise this goes beyond the normal compliance obligations of good governance, placing social, ethical and environmental matters at the forefront of their ambition to deliver sustainable growth.***

My board colleagues and I are committed to ensuring that Life Healthcare Group is a leader in global corporate sustainability. Recognising the importance of non-financial issues with a high degree of transparency demonstrates that we are a forward thinking company with a high standard of self-awareness and risk management, both of which will help deliver long-term value creation.

This Code of Conduct supports these aspirations and provides tangible evidence that we are publicly committed to a progressive approach to doing business. It has my full support and I hope to see your firm commitment to the entrenched principles, as articulated in this Code.

I look forward to seeing us deliver against its core purpose.

# A WORD FROM THE LEADERSHIP TEAM

*At Life Healthcare Group our vision is to be a market-leading, international, diversified healthcare provider that improves the lives of people through the delivery of high-quality, cost-effective care. We will always strive to do our best, to satisfy our patients and to deliver compassionate care, enabling us to continue to successfully grow.*

We provide health services to patients across the world, assisting them with their healthcare and helping improve standards of living while supporting and developing local communities. Through the skills and dedication of our global teams we deliver world class services to patients when and where they are most needed. We have a reputation as a responsible, ethical and respected healthcare provider and we are relentless in retaining this position through the application of universal standards that define what it means to work for and partner with Life Healthcare.

We are proud that the people on our teams come from across the globe, with diverse backgrounds, experiences and perspectives. This diversity is at the heart of our global success. Our history is one of being acknowledged for our ethical approach as much as for our growth and business performance. Diversity and ethics are what unites us as a company. We should all strive every day to put our patient's interests first, be accountable for the work we do, respect each other as individuals and care deeply about how we do it.

**AT LIFE HEALTHCARE WE HAVE THREE CENTRAL BELIEFS**

<b>Life</b>	Dedication to well-being and quality of life
<b>Health</b>	Clinical excellence in world class facilities
<b>Care</b>	Quality service, respect and a spirit of giving to those entrusted to our care

This Code of Conduct defines the framework of conduct we consider in our daily activities as we work towards delivering against our beliefs. It has been approved by the Board of Directors and is binding on every employee, officer, director, contractor and supplier of the Group and its various subsidiaries across all territories within which we operate.

Thank you for taking the time to read it, and more importantly, for your dedication and commitment to deliver against its principles.

# OUR CODE OF CONDUCT



## OUR CODE OF CONDUCT

*At Life Healthcare Group, our vision is to be a market-leading, international, diversified healthcare provider that improves the lives of people through the delivery of high-quality, cost-effective care. We will always strive to do our best, to satisfy our patients and to deliver compassionate care, enabling us to continue to successfully grow.*

Underpinning this is a central principle of 'dignity':

- **dignity** for those we serve
- **dignity** for those who serve

This Code of Conduct defines how we achieve this. We are a diverse organisation but we are united by these common goals and principles with a shared commitment to the highest standards of integrity and ethical conduct.

## It is our Code of Conduct

Through **our** Code, we will create:

- a business culture that sets us apart from our competitors and will help us be even more successful
- an environment for our patients that will help make their lives better at times of real uncertainty, and
- a workplace where we all feel we belong, are able to contribute and benefit from our shared successes

Each of us has a personal responsibility to read our Code, understand what it means in the context of our daily activities and apply it consistently.

For those of us who lead others, we have a particular obligation to ensure that we, and everyone else at Life Healthcare, abides by our Code and that we set the right example for our teams, ensuring that decisions are always taken in the context of the highest standards of governance, accountability and ethical considerations.

# OUR REPORTING RESPONSIBILITIES

## OUR REPORTING RESPONSIBILITIES

***We will not walk past inappropriate behaviour, we will take responsibility for raising concerns through the correct channels and we will respond positively to such concerns as they are raised.***

Life Healthcare can only maintain our high standards if we encourage patients, colleagues, customers, suppliers and other stakeholders to speak up in the face of inappropriate behaviour. We should all feel encouraged and secure in reporting concerns about serious wrongdoing, recognising that we have a wider responsibility to our communities to challenge unacceptable practices.

If you are in any doubt, ask yourself some simple questions:

- Is the action you are concerned about legal?
- Is it unethical?
- Is it discriminatory?
- Does it break any company or industry rules?
- Does it seem fair?
- Does it put patients, colleagues or the general public at risk?
- Would others – your manager, your colleagues or your family – deem this action to be inappropriate or wrong?
- Would there be a negative reaction if this reached the public domain through the media?

If the answer to any of the above questions is 'yes' then we would encourage you to raise your concerns through the appropriate channels.

If you would like guidance on how to approach such an issue, approaching your immediate line manager is usually the right place to start and is the most appropriate channel for reporting concerns. You may also get help or advice from their manager, your HR team, your legal team or through the Life Healthcare Helpline, details of which are available in each territory.

The Helpline is an independent, confidential service available to all Life Healthcare colleagues across every territory. All calls to the Helpline are made to and managed by an independent third party with the requisite knowledge and experience to deal with calls of this nature. The anonymity of all callers is guaranteed.

We recognise that raising concerns is a serious matter and that these reporting rights must be used responsibly and only where you reasonably believe there has been a violation. As such, the Company will not tolerate malicious reporting with the intention of harming or victimising another person. Such behaviour will be deemed a serious and potentially dismissible offence.

Equally, your management should always treat seriously any concerns you have raised and should ensure each instance is treated professionally, with the necessary confidentiality, in line with country policies and without any fear of retaliation.

## Life Healthcare has a policy of non-retaliation

We want to encourage individuals to come forward with any genuine concerns. That is why we strictly prohibit retaliation or victimisation, in any form, against anyone who, in good faith, reports a concern, raises a complaint or reports a possible violation. 'Good faith' in this context means a genuine and sincere belief that there are legitimate concerns for Life Healthcare to address without any intention of malice or to gain personal advantage. Anyone responsible for reprisals against individuals who, in good faith, report suspected misconduct or other risks to the business should expect to be subject to formal disciplinary action. Retaliation will not be tolerated.

# OUR ETHICAL CODE

## OUR ETHICAL CODE

### Regulatory requirements

*We will always respect and comply with the regulatory requirements in the territories within which we operate.*

Life Healthcare conducts business across multiple international territories and acknowledges its obligation to understand and comply with applicable legal and regulatory requirements wherever it does business. We will endeavour to meet these requirements and will **engage with regulatory authorities openly and honestly**.

Life Healthcare is committed to paying its fair share of tax in the territories in which it operates, based on local tax regulations, and will operate in accordance with legal requirements and ethical practices in respect of tax planning arrangements.

### Anti-bribery

*We will not offer or accept improper payments or non-financial benefits, we will report and investigate all suspicious circumstances or allegations relating to bribery or corruption.*

**Bribery and corruption is illegal in all of our territories.** Life Healthcare believes bribery and corruption in any form distorts markets and harms overall economic, social and political development. In dealing with public bodies, other companies or individuals, Life Healthcare firmly adheres to ethical business practices that are premised on principles of openness and transparency. Our commitment to business integrity is clear and unequivocal. We will not seek to influence or be influenced by others, either directly or indirectly, by paying and requesting bribes, excessive incentives, facilitation payments or by any other measure that is unethical or may be construed as an attempt to improperly influence behaviour or that would tarnish our reputation for honesty and integrity. **Even the appearance of such conduct must be avoided.** Equally we will not accept any bribe from any third party. All suspicious circumstances relating to bribery and corruption will be robustly investigated.

### Ethical procurement

*We will always conduct fair, transparent and proper procurement processes and take all procurement decisions in the best interest of our business and its stakeholders.*

Life Healthcare is extensively involved in the procurement of pharmaceuticals, clinical products, equipment and services. Our approach to procurement is rigorous but fair. We will endeavour to ensure that we procure responsibly with due regard to sustainability and international labour practices. As decision makers we avoid situations that may reasonably give the appearance of improper conduct and will refuse to accept any personal benefit (including gifts, goods, services or entertainment) from a supplier that may be deemed to influence our decision making processes. We do, however, recognise that giving or receiving reasonable tokens of appreciation or entertainment is accepted practice to further a business relationship and we will be sensitive to the different norms and conventions in the cultures of the territories within which we operate. **As a customer we will refuse to deal with suppliers who do not respect our Ethical Code** and who seek to inappropriately influence our procurement decisions nor will we provide a supplier or any other party with confidential or other information that might place them at an advantage to secure our business. Colleagues who are involved in procurement decisions understand that they are governed by special rules relating to conflicts of interest.

Our  
approach to  
procurement  
is rigorous  
but fair.

## Competing fairly

*We will be honest and fair, acting in line with all applicable laws and regulations in the territories where we conduct business, protecting competition and the integrity of markets.*

Life Healthcare strictly adheres to competition laws in all of its markets and actively promotes competitive prices and product choices for customers and patients. **We compete best in a free trade environment** where we can benefit from the unique track record, skills and experience we collectively possess. This environment challenges us to continually improve our competitiveness and creates an environment that allows us to proactively respond to customer and patient needs without resorting to unfair practices. It promotes the development of local economies, provides competitive prices and product choices and encourages employment opportunities in the territories in which we operate.

We recognise the benefit of working with our competitors in professional trade bodies but are committed to ensuring that any discussions or activities in such an environment are appropriate and supportive of a free trade environment. Any attempt to engage us in inappropriate discussions will be challenged and reported to the appropriate authority. We will not abuse a position held in any market or engage in any anti-competitive behaviour.

**We respect our competitors and will not disparage or make false statements about them or their services.** Further, we will not attempt to obtain or use their trade secrets or proprietary information against them, recognising that the process of gathering and using competitive information should be fair and lawful.

## Conflicts of interest

*We will actively avoid activities that create, or even appear to create, conflict between our personal interests and the interests of the Company, ensuring that we are able to fully and fairly represent the Company in all instances.*

A conflict of interest exists when an employee's personal or professional interests or activities affect their ability to exercise clear and effective judgement on decisions that need to be taken for and on behalf of the Company.

Life Healthcare recognises that colleagues and their families have activities outside the Company and that these are important for a healthy work-life balance. However, to be successful as a Company, we must ensure that the personal, social, financial or political activities of ourselves and our families do not have the potential for interfering with our objectivity in performing our jobs. We recognise that actual conflicts must be avoided and that equally the potential appearance of a conflict of interest can also be harmful to our reputation. Colleagues who are involved in procurement and recruitment decisions recognise that they have a professional responsibility to ensure that all selection decisions, purchasing decisions and choice of suppliers are conducted impartially and objectively and, where appropriate, they will recuse themselves from such decisions.

Within healthcare it is common for colleagues to work for other organisations such as nursing agencies or equivalent and they may occasionally spend time working in competitor organisations. In such circumstances, we request openness from colleagues regarding any work undertaken and recognise the importance of ensuring that our responsibilities to the Company and our patients are not affected in any way. We encourage colleagues to engage in voluntary work and will provide the necessary advice and guidance should they believe their involvement could raise a conflict of interest.

Where necessary, we will request that colleagues provide a declaration of interest to be considered in respect of their participation in procurement decisions.

**Our principle to act fairly applies equally in respect of our relationship with our suppliers.**

## **Life Healthcare recognises that**

colleagues and their families have activities outside the Company and that these are **important for a healthy work-life balance.**



## Financial reports and accounting

*We will ensure accuracy and completeness of our financial reports and accounting to provide shareholders, regulatory bodies and other stakeholders with confidence in our financial and accounting information.*

Colleagues with responsibility for overseeing our financial accounts and records have a responsibility to ensure that all payments, receipts and other transactions are accurately and completely recorded in accordance with local accounting principles and standards and the Company financial procedures. **In addition, colleagues must help to ensure that reporting of business information is accurate, honest and timely.** We recognise that a failure to keep accurate and complete records can be construed as a financial irregularity or may be evidence of potential fraud. Accurate financial reports and accounting are a fundamental measure of our credibility.

Colleagues with responsibility for overseeing our financial accounts and records will ensure a proper control framework is in operation and that financial decisions are always made within agreed financial decision making mandates without bias or being subject to improper influences. We will use our best endeavours to ensure that no false, misleading undisclosed or unrecorded account, fund or asset is established or maintained. Equally, we will use our best endeavours to ensure that Company records are never suppressed, altered or destroyed without authorisation and that information provided to auditors will never be false or misleading.

We recognise that the standards that apply to external financial reporting apply equally to internal financial and non-financial reporting.

## Public bodies

*We recognise that providing services to public bodies implies a higher standard of accountability to provide confidence that public funds are being appropriately allocated.*

Life Healthcare partners with public bodies in all of our territories and we recognise that special rules apply when a government is our customer. **We will always ensure that our local teams are aware of their obligations in this regard,** will seek to deliver value for money services, adhere to local procurement rules and will act responsibly and with integrity in respect of the allocation of public funds.

We will ensure  
**accuracy** and  
**completeness**  
of our financial  
reports





## Political activity

*Life Healthcare does not make direct or indirect contributions to any political parties and/or candidates.*

This includes contributions to candidates, office holders and political parties including supporting political fundraising or campaigning activities through the provision of goods or services, access to staff during working hours, funding advertisement or other campaign expenses.

## Inside information

*We will handle inside information appropriately and lawfully and will never seek to obtain corporate or personal advantage through the misuse of such information.*

Inside information is commercially sensitive information about an organisation that is not in the public domain and of which we may, through our day-to-day business dealings, become aware.

**Life Healthcare is committed to supporting fair and open trading in shares or other securities of Life Healthcare** and prohibits colleagues from trading in such assets while in possession of inside information gained in relation to the performance of their duties.

In addition, colleagues are prohibited from disclosing confidential information or tip-offs to external parties, including investors, analysts, media contacts or family members, who may use this information for corporate or personal gain, irrespective of whether the information relates to Life Healthcare or another company with whom they have come into contact during the course of their duties.

**We expect all colleagues, their families and others whose relationships with Life Healthcare give them access to inside information to comply with these principles.** Insider trading is an offence under the law in all of our territories and will not be tolerated. We will provide our full support to the relevant authorities in respect of any investigation into potential insider trading.

## INSIDE INFORMATION IS

### **commercially sensitive information**

about an organisation that is not in the public domain and of which we may, through our day-to-day business dealings, become aware.

We recognise  
that our  
patients use  
our services  
during a time  
in their lives  
**when they are  
vulnerable.**

## Our Ethical Code in Action

- **We recognise** that our patients use our services during a time in their lives when they are vulnerable. We are, therefore, committed to making responsible patient-focused decisions at every level and will not expose patients to unnecessary risk for the sake of making a profit.
- **We will ensure** we are aware of the relevant legal and regulatory frameworks within which we operate and will rigorously enforce compliance in all instances.
- **We will ensure** that appropriate internal frameworks, policies and procedures exist that place ethics at the centre of the way we conduct our business activities.
- **We will encourage** colleagues to act legally, fairly and transparently in their daily activities and will never ask them to undertake any activities that may be contrary to our commitment to adhere to best ethical business practices.
- **We will operate** fair and transparent procurement processes, encouraging healthy competition between suppliers and responsible sourcing of products and services.
- **We will avoid** situations in which personal interests conflict or may appear to conflict with the interests of Life Healthcare and will disclose any personal interest (direct or indirect) that may potentially influence our impartiality in business decisions.
- **We will never accept** any gifts, financial contribution or entertainment (directly or indirectly) unless it is in line with approved local policy.
- **We will never seek to abuse** our employment within Life Healthcare to seek inappropriate personal financial advantage.
- **We will never offer** or give, directly or indirectly, any money, goods or services to a third party to obtain or retain business, or to secure any improper advantage.
- **We will never offer** or give a gift, financial contribution or entertainment under circumstances that might create the appearance of impropriety.
- **We will never use** or provide inside information to gain personal benefit for ourselves or anybody else with whom we are in contact.
- **We will never engage** in anti-competitive practices with competitors to influence prices, terms, tenders or markets.
- **We will never offer** or contribute any Life Healthcare funds or other company assets for political purposes.

## WE RECOGNISE THAT

our patients use our services during a time in their lives when they are vulnerable. We are, therefore, committed to making **responsible patient-focused decisions**

### Our Ethical Code assurance

*Life Healthcare Group ensures the promotion of our Ethical Code in each territory through:*

- The operation of core policies:
  - Anti-bribery
  - Ethical procurement (including Fair Trade)
  - Whistle-blowing
  - Health and safety
  - Insider trading
- Visible local senior leadership support.
- Robust internal financial decision making frameworks.
- External and internal financial audit programmes.
- Requirements for Ethical Code principles to be applied in the procurement process and to be included in supplier contracts and contractor agreements as appropriate.
- Ensuring formal processes exist to support policies, including:
  - Financial decision making mandates
  - Closed period notification process
  - Existence of an independent whistleblowing facility

OUR RESPECT  
CODE

## Human rights

*We recognise and promote recognised international principles of human rights.*

**Life Healthcare believes that companies have a responsibility to contribute to the promotion and protection of internationally proclaimed human rights.** The United Nations' Universal Declaration of Human Rights (UDHR) calls on "every individual and organ of society" to play a part in the universal observance of human rights. Life Healthcare is firmly committed to the principles of human rights. Consistent with our view that respect for human rights is a moral and business imperative, we will endeavour to support the rights of those impacted by our operations. To this end, we will support and respect the protection of human rights within our sphere of influence, not be complicit in any human rights abuses and will support the promotion and protection of human rights.

## Labour rights

*We recognise the value that progressive employment practices bring to the success of our business.*

**Life Healthcare will always endeavour to eliminate all forms of forced labour and the abolition of child labour.** We are committed to combatting the real and growing problem of modern slavery and human trafficking and will do our utmost to ensure that such issues do not exist in our business or our supply chains.

We will also fully support the elimination of discrimination in respect of employment and occupation.

We will actively support working in partnership with employees and their representative bodies and are committed to positive employment engagement and to creating an environment in which individuals are able to develop their careers.

## Patient privacy, dignity and respect

*We ensure our patients are afforded the privacy, dignity and respect they deserve.*

Life Healthcare exists to provide patients with the highest level of support we can while they are in our care. **Patients, their families and friends have a right to expect that we treat them with dignity, compassion, empathy and care at all times.** It is the responsibility of all of us to promote privacy, dignity and respect for each of our patients, ensuring our culture is one where everybody has a voice and everybody matters.

## Anti-bullying and harassment

*We treat others with respect and do not tolerate bullying or harassment in any form.*

Each of us can only make a full contribution to our performance if we treat one another with the respect, trust and dignity we ourselves expect. **Life Healthcare insists on a work environment free of bullying and harassment for colleagues, patients, customers, suppliers and any other stakeholders.** As individuals, we each have a right to expect a positive working environment and a responsibility to speak up where we observe that this is not happening. In particular, we will not tolerate sexual harassment in any form, including unwelcome sexual advances, requests for sexual favours, suggestive or sexual jokes and innuendos and remarks or physical contact or conduct of an intimate and sexual nature. In all instances of bullying and harassment we will take a robust approach to any proven allegations, including potential dismissal.

We are particularly mindful of the increasing importance of social media in our workplaces and these principles should equally apply to the online environment.

Regrettably, healthcare teams occasionally find themselves the victims of verbal and physical assaults from patients, their family and friends or other members of the public. **Threats, intimidation and violence have no place in a healthcare environment and will not be tolerated.** In such circumstances, we will ensure that affected colleagues are fully supported if they find themselves in such a position.

Life  
Healthcare  
exists to  
provide  
patients with  
the **highest**  
**level of**  
**support.**

Treating all  
colleagues  
fairly allows  
our teams  
to feel  
motivated

## Equal opportunities

*We treat people fairly and do not tolerate discrimination.*

**Treating all colleagues fairly allows our teams to feel motivated which, in turn, underpins the provision of world class patient care.** Respecting and recognising the contribution of each individual on the basis of their capability, without regard to personal characteristics such as race, religion, gender, age, disability and sexual orientation, is at the heart of how we do business. It ensures we are able to attract and retain the best possible workforce, who are representative of the communities they serve.

As a minimum standard, we will follow all local legislation that prohibits discrimination in all of our territories and will work to promote the right of equality, to eliminate unfair discrimination and provide workforce diversity.

## Our Respect Code in action

- **We will always introduce ourselves to patients**, we will always refer to patients by their name, we will always explain to patients the treatment they will receive, the risks and the associated timescales, and, we will always listen and address, to the best of our ability, any concerns they may raise.
- **We will always design and implement** our patient-facing services in a manner that protects a patient's dignity and privacy, providing a safe, clean and organised environment.
- **We recognise** that the way in which we act is as important as the activities we undertake and will consciously seek to avoid behaviour that may be deemed to be bullying, harassment, discrimination, victimisation, demeaning or disrespectful.
- **We will never make comments**, engage in discussion or take actions that are or could be construed to be discriminatory based on race, religion, gender, sex, pregnancy, marital status, family responsibility, ethnic or social origin, colour, sexual orientation, age, disability, HIV status, conscience, belief, political opinion, culture, language or birth.
- **We recognise and embrace** the benefits and opportunities that social media can bring as a tool, including online social forums, blogs, video and image sharing and similar facilities. However, we also recognise the inherent risk involved in using social media and we are committed to ensuring that our Respect principles apply equally in the online environment.
- **We will receive and respond** to feedback positively and commit to make improvements where appropriate.
- **We will not walk past** inappropriate behaviour, we will take responsibility for raising concerns through the correct channels and we will respond positively to such concerns as they are raised.
- **We will operate** progressive employment practices that protect the dignity of individuals, encourage employee participation in our business and provide opportunities for career development.

## WE RECOGNISE

**the way in which we act** is as important as the activities we undertake

### Our Respect Code assurance

*Life Healthcare Group ensures the promotion of Respect in each territory through:*

- The operation of core policies:
  - Patient privacy, dignity and respect
  - Employee privacy, dignity and respect
  - Anti-bullying and harassment
  - Disciplinary
  - Equal opportunities
  - Grievance / conflict resolution
  - Social media
  - Performance management
  - Information governance
- Visible local senior leadership support.
- Robust employee checking procedures, that are audited regularly (e.g. criminal / police records checking) to the extent required or permitted by application legislation.
- Internal communication that supports the principles of Respect.
- Delivering local training on principles and policies.
- Requirements for Respect principles to be included in supplier contracts as appropriate.
- Ensuring formal processes exist to support policies, including:
  - Established legal recourse where required
  - Access to mediation
  - Existence of an employee assistance programme
  - Existence of an independent whistleblowing facility

# OUR CONFIDENTIALITY CODE



Life  
Healthcare  
considers  
the  
information  
we possess  
**to be  
an asset.**

## Information governance

*We believe in respecting the confidentiality and integrity of all the personal and confidential information (“Information”) that we hold and are committed to preserving, protecting and responsibly using such Information, adhering to all relevant legal and regulatory requirements.*

**Life Healthcare considers the information we possess to be an asset and we will protect it accordingly.** We will always ensure that we operate within relevant legal and regulatory requirements and that such Information will be:

- Subject to responsible governance
- Held securely and confidentially on the basis that we have a legitimate interest for holding such information
- Obtained fairly and efficiently
- Recorded accurately and reliably
- Used appropriately and transparently
- Shared appropriately and lawfully
- Accessible in accordance with the legal rights of an individual or organisation
- Processed with the necessary authorisation or consent
- Managed on an ongoing basis and deleted when appropriate to do so

## Information security

*We recognise the importance of information and are committed to ensuring the security of the Information we hold.*

Life Healthcare will establish and maintain standards and policies to ensure the confidentiality, security, integrity and availability of its Information assets and resources. **We will establish and maintain appropriate organisational and technical measures to secure against accidental or unlawful destruction, loss, alteration and unauthorised disclosure of such information.** Each of us has a responsibility to operate within this framework to ensure we can demonstrate to stakeholders the organisational and technical measures we have in place and the seriousness with which we approach good information security practice.

## Proprietary information

*We are committed to protecting the confidentiality of proprietary information to ensure that our financial and intellectual investments are protected and that, collectively, we may enjoy the benefits of our hard work.*

Life Healthcare produces non-public ideas, concepts and information that are valuable ‘proprietary’ assets or intellectual property including marketing plans, employee records, business ideas, proposals or strategies, proprietary software, employment practices and processes, business models, training programmes, patents, copyrights or trademarks. We will not disclose proprietary information without seeking the necessary level of approval and, where information is shared, we will ensure that appropriate controls are in place to protect our interests. **Equally, we will respect the proprietary information of others and will not encourage people to disclose sensitive information without the necessary approvals.** Each of us recognise’s that we have a personal responsibility to safeguard Life Healthcare’s assets from misuse.



## WE WILL NOT WALK PAST

**inappropriate behaviour**, we will take responsibility for raising concerns through the correct channels and we will respond positively to such concerns as they are raised.

### Our Confidentiality Code in action

- **We ensure** we are familiar with the relevant legal and regulatory requirements, including through the completion of appropriate mandatory training where relevant.
- **We adhere** to all internal policies and procedures and never seek to take shortcuts, apply inappropriate discretion or take risks in respect of the information we hold.
- **We never share** personal passwords with each other, irrespective of the circumstances.
- **We will not discuss**, reveal or share any patient, colleague or third party information with any unauthorised persons, unless clear and unambiguous consent has been given or there is a critical clinical need.
- **We will not walk past** inappropriate behaviour, we will take responsibility for raising concerns through the correct channels and we will respond positively to such concerns as they are raised.

### Our Confidentiality Code assurance

*Life Healthcare Group ensures the promotion of Confidentiality in each territory through:*

- The operation of core policies:
  - Information governance
  - Information security
- Visible local senior leadership support.
- Delivering local training on principles and policies.
- External and internal information governance audit programmes.
- Requirements for Confidentiality principles to be included in supplier contracts.
- Ensuring formal processes exist to support policies, including access to and completion of mandatory training as appropriate.

# OUR SUSTAINABILITY CODE

We are  
committed to  
managing a  
**safe, secure  
and healthy  
working  
environment.**

## Health and safety

*We are committed to fostering a safe, secure and healthy working environment.*

Life Healthcare is committed to managing a safe, secure and healthy working environment. The safety of our employees and everybody who visits any of our premises is a high priority and underpins all of our business decisions and processes. **We will establish and maintain standards and policies to ensure that health and safety is a prerequisite and commit to strive to minimise incidents.** We will adhere to all local regulatory health and safety requirements and will actively promote our expectation that all colleagues and suppliers understand their individual and collective responsibilities to uphold our health and safety standards. We recognise that managers have special responsibilities to ensure we meet our health and safety goals and to encourage responsible practices in their teams. Contractors supporting us on construction projects will be required to ensure that all specific local regulatory health and safety requirements relating to such projects are respected.

## Environmental

*We are committed to excellence in environmental management and recognise our collective responsibility to promote sustainable environmental practices.*

Life Healthcare is committed to excellence in environmental management and the protection of the environment is one of our critical areas. As per the principles of the UN Global Compact, we will adopt a precautionary approach to environmental challenges.

**Continuous improvement in our environmental practices is central to achieving sustainable growth and is an integral consideration in our business decisions and processes.** We will adhere to all local regulatory environmental requirements and will actively promote our expectation that all colleagues understand their collective and individual responsibility to continuously improve our environmental performance. We recognise that managers have special responsibilities to ensure we meet our environmental goals and to encourage responsible practices in their teams.

## Community

*We recognise our moral obligation to support and contribute to the communities in which we operate.*

**Life Healthcare is committed to being a positive contributor to the communities in which we operate** and will act as responsible stewards of our products and services. We will engage in supporting the economic success of our local communities and with local programmes and initiatives, acting as a positive corporate citizen on all occasions.

We ensure  
we maintain  
**a safe  
workplace**

## Our Sustainability Code in action

- **We ensure** we maintain a safe and environmentally sound workplace through the application of industry best operating practices and compliance with all relevant legal requirements.
- **We monitor performance** against health and safety and environmental objectives through the operation of consistent key performance indicators.
- **We operate** formal reporting procedures for health and safety incidents and actively encourage colleagues to report both actual incidents and near misses to encourage a culture of continuous improvement.
- **We will respond** to incidents, potential risks or hazards and promote them as opportunities to improve.
- **We learn** from incidents and share the lessons learned with all stakeholders as appropriate.
- **We require** all suppliers and contractors to conduct their activities with us in a safe and environmentally responsible manner.
- **We ensure** the functional competence of all employees through ongoing training, development, communication and appraisal programmes.
- **We implement** preventative / monitoring programmes in risk areas such as hygiene, infection control, biological monitoring and medical surveillance programmes.
- **We identify** and minimise waste in the use of energy and all other resources.
- **We effectively manage** the disposal of hazardous waste at all of our clinical sites in line with regulatory requirements.
- **We participate** in community and charitable activities appropriate to the size, means and capabilities of our global businesses.
- **We encourage** all our businesses to engage with their communities and support appropriate initiatives and good causes.

## WE ENSURE THE FUNCTIONAL COMPETENCE

of all employees through **ongoing training, development, communication and appraisal programmes.**

### **Our Sustainability Code assurance**

*Life Healthcare Group ensures the promotion of Sustainability in each territory through:*

- The operation of core policies:
  - Health and safety
  - Environment
  - Community engagement
- Visible local senior leadership support.
- Delivery of appropriate development and training to ensure colleagues are familiar with their health and safety duties.
- Allocation of resources to support good health and safety, environmental and community practices.
- Procuring responsibly with due regard to the materials sourced and labour practices of the supplier and / or services provider.
- Requirements for Sustainability principles to be included in supplier contracts.

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**Disclaimer:** This Code of Conduct defines the framework of conduct that Life Healthcare Group aims to achieve in its daily activities as we work towards delivering against our beliefs. It has been approved by the Board of Directors and is binding on every employee, officer, director, contractor and supplier of the Group and its various subsidiaries across all territories within which we operate. This Code of Conduct is however not a legal document and should be relied upon for reference and guidance purposes only. Use or reliance on this Code does not give rise to any legal relationship with Life Healthcare Group. Life Healthcare Group and its various subsidiaries across all territories do not accept any liability arising from the use or reliance on this Code of Conduct and do not make any representation or warranty in regard to its compliance therewith. To the maximum extent permitted by law, Life Healthcare Group and its various subsidiaries across all territories expressly disclaim any liability to any person, howsoever arising (including without limitation, for negligence, tort/delict and in contract) for any and all loss or damage that may arise from the use or reliance on this Code of Conduct.