



Healthscope

Code of Conduct

Healthscope Limited
ACN 144 840 639
(Company)
17 September 2019

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Chief Executive Officer's Message

Healthscope has a vision to be a recognised leader of quality private health care services.

In delivering our vision, we know that when we deliver quality clinical outcomes and exceptional patient care through our extraordinary teams, everything else takes care of itself. Healthscope operates in an environment where safety and quality are paramount, comfortably balanced against our responsibility to shareholders and stakeholders.

The way people associated with our business behave is crucial to Healthscope's reputation among our stakeholders and the wider community and can directly enhance or reduce shareholder value.

Our Board and management are committed to our Code of Conduct (Code) which is based on our core values and on the expectations of our clients, of shareholders, and of the broader community. It complies with the law and with other guidelines on appropriate ethical standards.

Our Code outlines how Healthscope expects all people associated with our business – including directors, the Senior Leadership Team, managers, employees, contractors, subcontractors, consultants, Visiting Medical Officers, agency employees, apprentices, trainees students and volunteers (together, Healthscope People or you), to behave and to conduct business.

The Code aims:

- to promote a high level of professionalism and provide a benchmark for ethical and professional behaviour throughout Healthscope;
- to promote a healthy, respectful and positive workplace and environment;
- to support our business reputation and corporate image within the wider community; and
- to ensure you are aware of the consequences you may face if you breach our Code.

Everyone at Healthscope needs to be familiar with our Code, live our values every day in the workplace and, at all times, act and behave in a manner consistent with establishing trust and confidence in our organisation.



Steven Rubic

Chief Executive Officer

Toll Free Ethics Hotline Number:

Australia: 1800 314 533 | New Zealand: 0 508 456 785

Ethics Point Website: <https://healthscope.ethicspoint.com>

Email: whistleblower@healthscope.com.au

Code overview and values

Overview

Our Code of Conduct (**Code**) helps you understand how Healthscope expects you to behave at work and at work-related events, and how Healthscope expects you to handle ethical issues so as to maintain the highest standards of integrity.

The Code complements our corporate policies and procedures which apply to all Healthscope facilities. If there is any inconsistency between the Code and another Healthscope policy, the policy overrides the Code.

The Code and the documents that underpin it apply to all Healthscope people. While the Code is designed to ensure Healthscope delivers on its commitment to corporate responsibility and sustainable business practice, it does not create any rights in any employee, client, customer, supplier, competitor, shareholder, you or any other person or entity.

Everyone at Healthscope is to behave in line with these guidelines in their everyday work. So that you can do this, you need to read and understand the Code and the documents which underpin it. Copies of these documents are available from 'hint' (the Healthscope staff intranet), your manager or your Healthscope contact.

If you do not understand something in these documents, you should seek clarification with your manager or Healthscope contact.

Healthscope core values

Healthscope is a values-driven organisation and insists that its people go beyond just complying with laws, with regulations and with basic standards of personal conduct. For this reason, our four core values set the framework for the ethical and professional behaviour we expect from each other and for the standards set in our Code:

Service excellence

- We strive to provide the highest standard of health care. We seek ways to improve our care and service and its delivery.

Teamwork and integrity

- We respect each other and openly and honestly communicate to allow us to work together to achieve our goals.

Aspiration

- Creativity, being forward looking and continuous learning are integral to our jobs and Healthscope's success.

Responsibility

- We take responsibility for our actions and consider their impact on others. We make decisions with a balanced focus on financial security and service excellence.

By understanding and living Healthscope's values, we aim to create and sustain an organisation where we can all be proud of everything we do.

What happens if you do not comply?

You must comply with this Code and our policies and procedures. It is your responsibility to read and understand these documents.

If you are an employee, and you do not comply with the Code or our policies or procedures, we may take appropriate disciplinary action against you.

Disciplinary action against an employee may include:

- disciplinary action up to and including ending your employment;
- notifying the relevant industry or professional regulatory agency;
- taking civil action; and/or
- referring the issue to a law enforcement agency.

If you are not an employee of Healthscope and you do not comply with the Code or our policies or procedures, we may:

- end our relationship with you;
- notify the relevant industry or professional regulatory agency;
- take civil action against you and the organisation that we have a relationship with; and/or
- refer the issue to a law enforcement agency.

See: Healthscope Corporate Policy 4.05 Performance and Conduct Management

Compliance with Laws, Rules, Regulations & Policies

Know and comply with all laws, rules, regulations and policies applicable to your position.

Many of Healthscope's activities are governed by laws, rules, regulations and policies that are subject to change. We expect you to make every reasonable effort to become familiar with the laws, rules, regulations and policies that apply to your work at Healthscope, and to comply with them.

If you break the law while working at Healthscope, you will be held personally accountable. Ignorance of the law is not, in general, a defense to breaking the law. Therefore, if you have questions about the applicability or interpretation of certain laws, rules, regulations or policies relevant to your activities at Healthscope, you should consult with your manager or Healthscope contact.

You must prevent or stop illegal or undesirable behaviour to make sure Healthscope is kept free from criminal influence or exploitation.

Wherever you work, if you observe misconduct, illegal activity or an improper state of affairs, you must immediately report it to your manager, Healthscope contact or to the independent Healthscope Ethics Hotline. Our Whistleblower Policy is additionally able to assist you.

The laws that govern our activities can be complex. So, if you are unsure about how a law, rule, regulation or policy applies to your work, you must consult with your manager or Healthscope contact.

See: Healthscope Corporate Policy 0.05 Whistleblower

Completion of mandatory training

We are committed to providing a safe workplace. A key way we can work towards a safe workplace is through providing training on workplace safety expectations, obligations and responsibilities.

We will identify training that you may require while you are working with Healthscope. You are required to complete any training that we may assign to you or direct you to undertake from time to time.

Complying with healthcare and professional standards

You may be required to comply with particular professional standards in order to maintain registration or qualification as a professional as part of your work at Healthscope, for example, if you are a healthcare practitioner.

If you are required to maintain ongoing registration or qualifications as a professional during your time at Healthscope, it is your responsibility to ensure that you continue to comply with all applicable professional standards and other requirements to maintain your registration or qualification.

If you are unsure about the professional standards and other requirements required to maintain your ongoing registration or qualification, you should contact the relevant regulating or governing body in your State.

National Disability Insurance Scheme (NDIS)

In circumstances where the National Disability Insurance Scheme Code of Conduct applies to services being provided, you must:

- Act with respect for individual rights to freedom of expression, self-determination and decision-making in accordance with applicable laws and convention.
- Respect the privacy of people with a disability.
- Provide support and services in a safe and competent manner, with care and skill.
- Act with integrity, honesty and transparency.
- Promptly take steps to raise and act on concerns about matters that may impact the quality and safety of support and services provided to people with a disability.
- Take all reasonable steps to prevent and respond to all forms of violence against, and exploitation, neglect and abuse of, people with a disability.
- Take all reasonable steps to prevent and respond to sexual misconduct.

Complying with record keeping standards

Accurate record keeping is critical to ensuring Healthscope complies with its legal and regulatory obligations.

Healthscope's business records include financial information and information related to our patients and their care. It is critical that you help preserve our business records, follow the guidelines set forth in any document retention policies and comply with related legal and regulatory requirements.

To ensure the information we are relying on is correct, you must:

- accurately and clearly record information, including information relating to our patients and Healthscope's operations;
- not tamper with any records or change information in order to falsify records or conceal something;
- ensure that you record information in a timely manner; and
- ensure that any information relevant to Healthscope's operations is stored in accordance with Healthscope's record keeping standards.

If you are responsible for keeping Group records and reports, you must keep them accurately and in line with the law. For some people, this includes

- complying with accounting rules and controls;
- reporting expenditures accurately and on time; and
- being able to provide proper evidence as required.

These requirements also apply to all non-financial records, including employee files, leave records, time sheets, workers' compensation and environmental documents.

If you are notified that your documents are relevant to an anticipated or pending litigation, investigation or audit, you must follow the guidance set forth in the notification you receive from Healthscope legal counsel regarding retention of documents.

Change in personal circumstances

Changes to your personal circumstances may impact on your ability to work at Healthscope.

If there are changes to your personal circumstances that impact, or have the potential to impact, your ability to work at Healthscope, you must promptly inform your manager or Healthscope contact in writing.

Examples of these types of changes include:

- being charged with or convicted of a criminal offence;
- loss of professional registration or qualification required to undertake your work at Healthscope;
- failure to obtain a professional registration or qualification required to undertake your work at Healthscope.

Competition

Healthscope competes vigorously and ethically at all times in the industry sectors in which it operates.

You must conduct all business competitively, honestly and ethically. You must never behave in a way that breaches competition laws in the countries in which we operate. For example, under the *Competition and Consumer Act 2010* (formerly known as the *Trade Practices Act*) in Australia:

- you must not have agreements or understandings with competitors that restrict competition - such as exclusive supply or distribution arrangements;
- you must not attempt to misuse Healthscope's market power to damage competitors;
- you must not use unlawful means to acquire a competitor's trade secrets or other confidential information; and
- you must not engage in misleading or deceptive conduct or collusive conduct - including understandings on prices, volumes and terms of sale.

Even a "nod and a wink" with a competitor can be a breach of your obligations.

If you are unsure about whether a proposed course of behaviour or conduct may breach competition law, you must consult with Healthscope internal legal counsel prior to engaging in the behaviour or conduct.

Your workplace

Others at work

We are committed to provide a challenging, enjoyable and positive workplace in which everyone can achieve their full potential and can make a difference.

To help us achieve this, you need to be polite and courteous and you need to treat others in the workplace fairly, and with respect and consideration, in an environment free from discrimination, harassment, or bullying.

In particular, this means you must:

- not use indecent, offensive or abusive language;
- never threaten others; or
- not behave in a violent way - such as fighting with or assaulting others.

If you are concerned that someone you work with is, or might be, involved in misconduct, you are expected to report this, cooperate in any investigation and provide relevant information to management and authorised external parties.

Equal employment opportunity and discrimination

We value the diversity of our workforce and we strive to provide a work environment in which everyone is treated fairly and with respect.

To help us achieve this, you are expected to be tolerant and respectful of the cultural differences of everyone at Healthscope, including Healthscope People, patients, clients, their families and any visitors to our workplaces.

Our policies, procedures, work conditions and practices:

- treat and evaluate everyone:
 - o according to the results they achieve;
 - o on the basis of their job-related skills, qualifications, abilities, aptitudes and behaviours; and
- do not directly or indirectly discriminate against employees as individuals or groups.

See: Healthscope Corporate Policy 4.23 Equal Employment Opportunity: Harassment and Discrimination and 0.12 Diversity and Inclusion

Harassment or bullying

Healthscope does not tolerate workplace harassment or bullying. All directors, officers and employees must ensure that Healthscope is a safe and respectful environment where high value is placed on equity, fairness and dignity.

At the same time, you and everyone else you work with must maintain acceptable standards of behaviour both at work and off duty, including at third party functions, and as well as when using social media.

You must never take part in:

- sexual or other forms of harassment that might humiliate, offend or intimidate another person; or
- workplace bullying.

We treat these types of misconduct very seriously. If you experience or become aware of discrimination, violence or harassment, you have a duty to report it. Complaints of discrimination, violence or harassment will be taken seriously and investigated. Any employee found to be harassing, acting or threatening to act violently towards, or discriminating against another individual, or any employee who knowingly condones the discrimination of, violence towards, or harassment of another individual, will be subject to disciplinary action up to and including termination for cause.

Healthscope reserves the right to discipline you if you knowingly make a false accusation about an innocent party; however, you will not face retaliation for making a good faith report or assisting in the investigation of a complaint.

See: Healthscope Corporate Policies 4.23 Equal Employment Opportunity: Harassment and Discrimination and 6.16 Bullying in the Workplace

Workplace health, safety and wellbeing

We are committed to providing a healthy and safe work environment with systems in place to identify, assess and control workplace health and safety issues. Our focus is on continually improving workplace health, safety and wellbeing with the aim to minimise hazards and risks. All appropriate laws and internal regulations (including occupational health and safety laws) must be fully complied with. Everyone has obligations to assist in ensuring that this situation is maintained at all times.

You must:

- take reasonable care of yourself and your colleagues at work;
- comply with our workplace health and safety policies and practices;
- report hazards, accidents and safety incidents in a timely manner; and
- complete any safety training you are required to complete.

If you supervise, manage or control a workplace, then in a timely manner you must also:

- identify hazards;
- conduct safety inspections; and
- make sure that patients, clients and their families, employees and others on site are not exposed to health or safety risks.

See: Healthscope Corporate Policy 6.01 Work Health and Safety

Substance abuse

We are all responsible for ensuring our own health and safety and the health and safety of others.

You must ensure at all times that you are fit to work and you do not pose a safety risk to others. This includes by ensuring that your performance and conduct are not adversely affected by alcohol or drugs (including illegal and prescription drugs) while:

- you are working;
- on Healthscope's premises; and
- you are at work-related activities (including outside of work hours).

You are responsible for advising your manager or Healthscope contact if you are required to take prescribed medication that impairs, or has the potential to impair, your ability to perform your work.

Smoking

Healthscope is a health care provider that is committed to the highest standards of care.

To assist us in this commitment, you are required to:

- observe all restrictions relating to smoking at Healthscope's premises;
- only smoke during designated breaks; and
- minimise the risks for non-smokers, including patients and others, by ensuring that any residual smoking odour is addressed following your break and before your return to work.

Environment

We aim to minimise how our business activities impact on the environment by:

- following responsible environmental practices; and
- complying with environmental laws and regulations.

You need to do whatever you can to minimise how your work impacts on the environment.

We encourage you:

- use water and energy sources responsibly;
- use our resources properly;
- recycle appropriate materials and dispose of waste; and
- use any necessary chemicals in an environmentally appropriate way.

If you are aware of, or suspect, an action that is not environmentally responsible or in breach of the applicable laws and regulations, report the matter in accordance with the '*Compliance with laws, rules, regulations and policies*' section above.

See: Healthscope Corporate Policy 1.45 Environmental Management

Privacy

Healthscope collects personal information regarding individuals both inside and outside the organisation. This is necessary to effectively and efficiently administer and manage the operation of our business.

Personal information includes, among other things, sensitive personal, medical and financial information. We store and process personal information in a number of different ways in order to meet our legal, regulatory or other obligations as an organisation. Healthscope is committed to the protection of personal and health information in accordance with the law.

If you have access to any personal information (including that of patients or clients, or other Healthscope People), you must protect the privacy of that information. You must take all reasonable steps to ensure that personal information is accessed only by those individuals within Healthscope that have a need to know the information to carry out their duties.

You should familiarise yourself with, and comply with:

- the privacy laws of Australia and, where applicable, the jurisdiction of your workplace, and report the loss or suspected loss of any personal information to your manager or Healthscope contact; and
- any privacy policies and procedures which apply to Healthscope generally or your workplace.

Privacy laws and policies may deal with matters such as the collection, use, storage and disclosure of personal information, direct marketing, surveillance, e-health records, healthcare identifiers, data matching, health research and individuals' rights to access and correct their personal information.

See: Healthscope Corporate Policy 2.23 Privacy

Confidentiality

You are required to protect and keep confidential all information (whether physical or electronic) relating to Healthscope's business. This includes information about our patients, clients and operations as well as information concerning our business, commercial arrangements and employees.

All of this information is to be delivered to Healthscope promptly after your employment ceases or at any time upon the company's request. Your obligation to protect this information continues after you leave Healthscope.

You must not disclose confidential information to anyone outside Healthscope unless it is disclosed in the proper exercise of you performing your duties for Healthscope, information that is disclosed with the prior consent of Healthscope, information which is available in the public domain or required by law. In such a case, you must first discuss the proposed disclosure with your manager. You must never use confidential information for your personal benefit, for the benefit of a third party or to disadvantage Healthscope.

While at Healthscope, if you become aware of confidential information about the company or another entity that you know or suspect has been inadvertently disclosed, seek guidance from Healthscope internal legal counsel before using or acting upon this information.

If you are not an employee of Healthscope, you may also have other particular obligations of confidentiality in addition to the above obligations:

- if you are engaged directly with us, due to any terms of engagement between you and us; or
- if you are engaged through another organisation, due to the terms of engagement between us and that organisation.

These obligations of confidentiality apply while you work at Healthscope and after our relationship with you ends or you leave the organisation.

See: Healthscope Corporate Policies 2.23 Privacy; 2.07 Confidentiality Information Services; 2.24 Release of Information; and your letter of offer/employment contract

Political and other activities

We do not make direct contributions to any political party. However, we do attend lunches, dinners, conferences or other events with political parties. Our representatives sometimes make a financial contribution to attend those functions and events. In line with the law, we disclose all those contributions to political parties. All attendance at such functions should be disclosed to internal legal counsel prior to attending and approval granted by the CEO.

In your personal capacity, you may (outside your work hours) be involved in any lawful political, community or social activities. We ask that you do not engage in actions that could cause someone to believe that your actions reflect the views or position of Healthscope, if that is not the case.

Grievances

We aim to achieve a safe, positive and productive environment in which our priority is the interests of excellent patient service. Raising and settling grievances is an important part of a culture of continuous improvement.

We encourage you to resolve grievances co-operatively. When grievances cannot be settled co-operatively, we use a confidential, stepped process. Through this process, we aim to resolve issues as soon as possible, starting at the first level of management.

See: Healthscope Corporate Policy 4.09 Grievances

Coaching, counselling and disciplinary process

We aim to achieve a safe, positive and productive environment for everyone. To achieve this, we need to promptly, constructively and fairly recognise, address, and correct inappropriate behaviour or performance.

When the performance or behaviour of a person falls short of our expectations set in their position descriptions, in departmental procedure manuals, in workplace policies and under this Code of Conduct, we may take action to address the situation.

In some cases, where appropriate, we may decide to take steps to directly address substandard or unacceptable performance or behaviour. This may involve coaching and counselling, verbal warning, written warning(s).

In certain circumstances, action taken in light of substandard or unacceptable performance or behaviour may include, if you are an employee, ending your employment, or, if you are engaged by another organisation to work with us, raising the behaviour or performance with the organisation that has engaged you.

Healthscope also has legal obligations to notify the relevant industry or professional regulatory agency in instances of misconduct or unsafe practice concerning the professional practice of health practitioners.

See: Healthscope Corporate Policy 4.05 Performance and Conduct Management

Whistleblowers and reporting misconduct

We aim to achieve a culture of honesty and integrity in everything we do. You are required to be proactive and promptly report any suspected violations of this Code, or any illegal or unethical behavior that you become aware of.

Whistleblowers are people who disclose criminal behaviour, misconduct or an improper state of affairs - for example breaches of this Code and associated policies.

Our employees need to feel they can safely report crimes and misconduct. So, we:

- support whistleblowers from recrimination; and
- acknowledge the importance of protecting whistleblowers under the law.

Occasionally, you might see someone at work doing something wrong, which may not seem to be serious misconduct or criminal activity. When deciding on whether to report this behaviour, you should use common sense and your own sense of what is right and wrong.

If you decide to report an incident or misconduct, you may raise the issue with your manager or Healthscope contact. If the matter is too sensitive or if it involves the conduct of your manager or Healthscope contact, you may speak to your supervisor's manager or to Corporate Human Resources.

We encourage you to contact our internal Whistleblower Protection Officer via whistleblower@healthscope.com.au to make a report. Any information you provide is dealt with confidentially (unless the law or a regulatory authority requires it to be disclosed).

In the event you do not want to report violations to your manager or the Healthscope Whistleblower Protection Officer, you can always report a complaint through the company's Ethics Hotline.

Our reporting hotline (the Healthscope Ethics Hotline) (the Reporting Hotline) is managed by an independent third party called NAVEX Global. The Reporting Hotline allows anyone to call anonymously (if they so choose) to report suspected unethical, illegal or unsafe behaviour. The Reporting Hotline is available toll-free, 24 hours a day, 7 days a week. All reports are independently investigated with oversight by Healthscope Internal Audit.

Toll Free Ethics Hotline Number:

Australia: 1800 314 533 | New Zealand: 0 508 456 785

Ethics Point Website: <https://healthscope.ethicspoint.com>

Email: whistleblower@healthscope.com.au

No retribution or retaliation will be taken against any person who has filed a report based on reasonable grounds. However, making a report does not necessarily absolve you (if you are involved) or anyone else of the breach or suspected breach. Healthscope reserves the right to discipline you if you provide false information or make an accusation you know to be untrue. This does not mean that the information that you provide has to be correct, but it does mean that you must have reasonable grounds to believe that the information is truthful and demonstrates a possible breach of this Code, Healthscope policies or illegal or unethical behavior. If you believe that you have been unfairly or unlawfully retaliated against, you may file a complaint with your manager, or Healthscope internal legal counsel, Whistle Protection Officer (WPO) or the Reporting Hotline.

See: Healthscope Corporate Policy 0.05 Whistleblowers

Cooperation during investigations and audits

We have responsibilities to properly investigate matters brought to our attention and we are obliged to provide accurate information when completing audits.

If we request your assistance with an investigation or an audit, you are required to fully cooperate. This extends to attending meetings, answering questions, and responding to allegations.

Employees must never conceal information from (i) an external auditor; (ii) internal auditor; or (iii) an audit committee of the company. In addition, it is unlawful for any person to fraudulently influence, coerce, manipulate or mislead an external auditor of the company.

Information systems and other group resources

Information systems

We use a range of information systems to run our business including voice mail, telephones, facsimiles, internet, intranet and email. We expect you to use these information systems which are available for business purposes, in line with the standards of behaviour set out in this Code. We also expect that you will not engage in personal social networking activities which may have an adverse effect on Healthscope, other employees, patients or the organisation's reputation.

This means:

- you must not use our information systems or credentials to bully or harass people, including the people you work with, patients, clients, their families and others;
- you must not use our information systems or credentials to access, transmit or store offensive material;
- you must not use our systems to break the law;
- you must never use social networking sites to comment adversely about Healthscope, people you work with, Healthscope staff, patients, clients or other person connected with our business; and
- you must ensure that comments or posts on any social media platform do not damage Healthscope's reputation, commercial interest and/or bring Healthscope into disrepute.

We expect you to protect the information communicated via, or stored on, our information systems.

You also need to safeguard the hardware, software and all data against damage, loss, theft, alteration and unauthorised access.

Healthscope's information systems are organisation resources. We can, and do, monitor your use of these systems.

See: Healthscope Corporate Policies 7.10 Email Management & Retention; 7.01 Information, Communications and Technology (ICT) – Acceptable Usage of, Healthscope 4.40 Social Media – Employee Use, 7.06 Information Security

Other resources

Our resources include money, property, equipment, information and intellectual property.

You may use our resources only for authorised business purposes and never for your own or anyone else's personal benefit.

You must take reasonable precautions to make sure no-one steals, damages or misuses any resources under your control. You may only use your ID, access cards and system passwords for authorised purposes.

Intellectual property

When you began working at Healthscope, you assumed specific obligations relating to intellectual property as well as the treatment of confidential information.

Intellectual property means all types of intellectual property and includes ideas, inventions, documents and programs which relate to Healthscope's actual or anticipated business, research or development that is suggested by, or results from, work or tasks you perform, or on behalf of Healthscope. It includes copyright, registered patents, designs, trademarks, know-how, trade secrets, logos, business names, confidential information and similar rights and includes reports, policies, manuals and the logos and business names of Healthscope and its facilities.

Any discovery, invention, secret process, business method, procedure or improvement made or discovered by you while in the service of Healthscope in connection with or in any way affecting or relating to (any of) the businesses of Healthscope or its associated companies shall be disclosed to Healthscope and shall belong to and be the absolute property of Healthscope. This includes but is not limited to all proprietary rights to intellectual property and trade secrets.

Subject to the law, this obligation applies no matter where and when – at work or after hours – such intellectual property is created. That intellectual property must be reported to Healthscope, and the property must be protected like any other proprietary information of the organisation.

Subject to the law and relevant professional standards, you must:

- return all Healthscope property including any documents or confidential information, when your employment, engagement or relationship with us ends or at the request of Healthscope or its representative; and
- if requested by Healthscope or its representative, destroy or delete any confidential information stored in electronic, magnetic or optical form so that it cannot be retrieved or reconstructed.

See: Healthscope Corporate Policies 7.01 Information Communications and Technology (ICT), Acceptable Usage of; 1.09 Copyright; 4.40 Social Media - Employee Use; and your letter of offer/employment contract

Dealing with others

Dealing with stakeholders

Healthscope's stakeholders include everyone who has an interest in what we do. They include our shareholders; patients and clients; the families and other interested parties of our patients and clients; suppliers; communities; regulators; government agencies; competitors; as well as our employees.

When you deal with stakeholders, you need to be aware that they may judge Healthscope by the way you behave. You are to be professional, diligent, courteous and efficient at all times. You need to always aim to protect our good reputation and avoid harm to others, which may be caused by your neglect or misconduct.

If someone makes a complaint and you are responsible for dealing with it, you need to:

- handle the complaint with a positive and courteous attitude; and
- be determined to satisfactorily resolve it.

See: Healthscope Corporate Policy 1.08 Complaints Management

Child safety

We are committed to protecting and safeguarding the welfare of children and young people on our premises and in our care.

You must maintain appropriate boundaries while caring for or associating with children or young people whilst undertaking work at Healthscope.

If you have concerns regarding a child's or young person's safety, you must:

- not ignore or disregard any suspected or disclosed child abuse or risk to a child's safety;
- take all reasonable steps to ensure the child's immediate safety and reduce any risk to them;
- speak immediately with management and together determine whether it is necessary to contact the appropriate authorities; and
- report the concerns to relevant authorities (if necessary).

Gifts, financial inducements and bribes

We must make our business decisions ethically, transparently and at arm's length - both in Australia and overseas. So you need to exercise the utmost care when you give or accept any benefits. You need to remember that this behaviour may create a sense of obligation to, or conflict of interest with, the other person or organisation.

Gifts and entertainment given to or received from persons who have a business relationship with the company are generally acceptable, if the gift or entertainment is modest in value, appropriate to the business relationship, and does not create an appearance of impropriety. In order to avoid any conflict of interest, gifts over the nominal value of \$250 must be referred to your manager and recorded in the Healthscope Register of Gifts.

No cash or cash equivalent payments should be given or received. In addition, gifts must not be given to or received from public officials. Employees who do not comply with these requirements may be required to reimburse the company for the value of any gifts or benefits they make or receive on behalf of the company.

You must never offer or receive bribes, facilitation payments, inducements or commissions (this includes any item intended to improperly obtain favourable treatment or avoid unfavourable circumstances).

Healthscope is strongly committed to preventing the use of its operations for money laundering, the financing of terrorism, or other criminal activities, and will take appropriate actions to comply with applicable anti-money laundering laws. Jurisdictions may publish lists of individuals and organizations that the company is prohibited from accepting funds from or distributing funds to under applicable anti-money laundering laws. Employees are expected to use reasonable care to verify that counterparties are not owned or controlled by, or acting on behalf of, sanctioned governments, groups, individuals or others. This includes requiring counterparties to make anti-money laundering representations in documents with the company, which Healthscope internal legal counsel can provide upon request.

You must not do anything that is against the law or which might create an obligation or a real or perceived conflict of interest.

See: Healthscope Corporate Policies 0.03 Philanthropic Donations and 1.13 Gifts, Gratuities and Conflict of Interest

Employee conflict of interest

If you are an employee, your primary duty is to us. So, we expect you to devote your work efforts to Healthscope and to make sure that your behaviour at work is transparent and based on what is best for Healthscope.

To achieve this, employees must always avoid having a real or perceived conflict of interest. A conflict of interest exists when:

- an employee's personal or private interests - or those of family, friends or associates - conflict with the employee's obligation to Healthscope or Healthscope's business interests or the interests of its patients, clients (and their families) and others; or
- an employee's decisions lead to an improper gain or benefit to the employee's or an employee's associate.

You must never engage in activities or businesses that involve - or could look like they involve - a conflict of interest with Healthscope.

Some common examples that illustrate actual or apparent conflicts of interest that you, as an employee, must avoid include:

- receiving or giving an improper personal benefit as a result of your position – an unreasonable gift is one in excess of \$250 in value under the Gifts, Gratuities and Conflict of Interest policy (unless acceptance is approved by the relevant manager and appropriately recorded);
- having a significant ownership interest or personal financial interest in any other enterprise if that interest compromises or appears to compromise your loyalty to Healthscope;
- taking advantage of property, information, or other opportunities arising from your position at Healthscope, including promoting any personal business interests to Healthscope employees, patients or clients;
- any conflict of interest arising from a personal relationship with any other employee within Healthscope;
- any outside employment or activity that conflicts with your ability to properly perform your work for Healthscope (including a position on the board of directors of another company or non-profit organisation);
- using Healthscope's name or purchasing power to obtain personal discounts or rebates unless the discounts or rebates are made available to all employees.

It is your responsibility to tell your manager about anything that could involve a conflict of interest (actual or potential). In particular, you should be aware of the potential for conflict in areas like purchasing, engagement of consultants or contractors, sales and marketing, and giving and receiving gifts, prizes and hospitality.

To avoid conflicts of interest, identify potential conflicts when they arise and contact Healthscope internal legal counsel if you are unsure whether a conflict exists. Directors should consult with the Chair of their Board of Directors on conflicts matters. In addition, if you become aware of any conflict or potential conflict of another director, officer or employee, you should consult with Healthscope internal legal counsel or the Chair of your Board of Directors, as appropriate.

See: Healthscope Corporate Policy 1.13 Gifts, Gratuities and Conflict of Interest

Working for others

If you are an employee, you may only take on additional work outside Healthscope (including working for a business in competition with Healthscope) if:

- you disclose it to your manager prior to taking on the work;
- Healthscope management determine that there is no conflict of interest in you taking on the work; and
- you receive written approval from Healthscope management before you take on the work.

Never take on additional work which may harm our reputation or negatively affect your performance while working for us.

See: Healthscope Corporate Policy 1.13 Gifts, Gratuities and Conflict of Interest and your letter of offer/employment contract

Media and public communications

We aim to make our public communications fair, accurate, clear and consistent. To help us achieve this, only persons authorised under the Media and Public Relations Policy and Communications Policy may:

- speak to the media;
- provide information to the media; and
- make public comments on Healthscope or health care industry matters.

If you receive a request for comments or information regarding a Healthscope facility and you are not authorised to respond to the enquiry, you must refer them to the General Manager of the facility or the appropriate member of the Senior Leadership Team.

Unless you have received prior written consent or are otherwise authorised, employees and associated parties must not participate in public forum discussions (including internet based forums and social media platforms) where the subject matter is related to Healthscope, its competitors or the health care industry.

Ensure that you are aware of the requirements of the Continuous Disclosure Policy and, if it applies to you, you must act in accordance with the policy.

See: Healthscope Corporate Policies 1.17 Media and Public Relations; 0.02 Continuous Disclosure Policy; 0.04 Market Disclosure and Communications Policy

Donations and sponsorships

We aim to provide a coordinated program of philanthropic support to improve the health and wellbeing of communities in the countries in which we operate.

We encourage our employees to be involved in their communities. We recognise the outstanding efforts of employees who support local community organisations.

All requests for corporate philanthropic donations and sponsorships should be referred to the member of the Senior Leadership Team who leads your business unit.

See: Healthscope Corporate Policy 0.03 Philanthropic Donations

Code administration

Responsibility for the code

Line management and Corporate Human Resources are responsible for implementing the Code.

Corporate Human Resources is responsible for making sure the Code is regularly monitored and reviewed. They will work closely with line management and the quality and legal functions to update the Code as needed.

Business management teams must include the Code in orientation and induction processes and must conduct training and education about the Code as needed.

More information

For more information, see Healthscope's corporate policies and procedures on the Healthscope intranet.

As our corporate policies and procedures may change from time to time, you are responsible for making yourself familiar with any updates.