



Supplier Policy

Policy statement

WellWell Medical Limited is an international healthcare company focussed on delivering quality, independent services in medical diagnostics and multidisciplinary medical practices. To ensure that WellWell Medical maintains its global reputation for quality, safety and service excellence, WellWell Medical expects all of its suppliers, service providers and any other agents or third parties in WellWell Medical's supply chain (collectively referred to as Suppliers) to adopt an approach to ethical business practices and sustainability that is consistent with WellWell Medical's high standards.

The Board of Directors, CEO and senior executives are responsible for setting the supplier code of conduct and overseeing compliance, however it is the responsibility of every WellWell Medical Employee who deals with Suppliers to adhere to these standards.

This general company-wide Policy does not override specific policies, laws or regulations in the local jurisdictions, but instead serves to complement them. If there is a conflict between this Policy and a specific local policy, law or regulation then this conflict should be referred to the local CEO and WellWell's Company Secretary in the United Kingdom.

WellWell Medical's Supplier Policy has been implemented to ensure that, as far as possible, WellWell Medical's Suppliers will:

- Comply with all relevant laws and regulations
- Conduct their business in an ethical manner
- Undertake their activities in a safe manner without putting themselves or others at risk
- Seek to pursue environmentally sustainable business practices
- Treat all individuals, including employees and customers, with respect and dignity, including observing all relevant laws and regulations regarding discrimination, equal opportunity, work health and safety and individual and human rights

WellWell Medical major Suppliers (those suppliers whose commercial relationship with WellWell Medical meets appropriate quantitative and qualitative materiality thresholds) have been provided with this Policy and asked to confirm that they will comply with the Policy. WellWell Medical seeks to include relevant aspects of its Supplier Policy into request for proposals or contracts when entering into formal arrangements with Suppliers or potential Suppliers.

Definitions

Associate

Associate means any third party (individual or organisation) who is not an employee, but is performing work on behalf of WellWell Medical Ltd (or a WellWell Medical's Healthcare subsidiary). This includes, but is not limited to, consultants, contractors, joint venture partners (and their employees), stakeholders and other business partners.

CEO

Means the chief executive officer, president or equivalent business head of a WellWell Medical's subsidiary.

Employee

Any person conducting business on behalf of WellWell Medical (or a WellWell Healthcare subsidiary), whether employed in a permanent, casual, fixed term, temporary or agency capacity.

WellWell

'WellWell' means WellWell Medical Limited and its subsidiaries, being all companies within the WellWell Medical Group worldwide (including controlled Joint Ventures).

To whom does this policy apply?

This Policy applies to all WellWell Medical subsidiaries and their Employees, Associates and directors. Companies and joint ventures in which WellWell Medical has a non-controlling interest are also encouraged to apply this Policy.

Compliance with the law

WellWell Medical requires its Suppliers to ensure that they and all of their officers, employees, agents, contractors and other representatives adhere to all applicable laws and regulations. In addition, Suppliers are required to ensure that they do not commit or participate in any acts of fraud, corruption, bribery or other conduct that either breaches laws relating to such conduct or would reflect adversely on themselves or WellWell Medical.

Code of conduct

WellWell Medical has adopted a code of conduct (Code) that outlines the standards required so that WellWell's people conduct themselves with the highest ethical standards. All Employees of WellWell Medical are informed of the Code. The Directors regularly review this Code to ensure it reflects best practice in corporate governance.

WellWell Medical expects its Suppliers to adhere to similarly high standards of ethical conduct at all times. This includes:

Ensuring they do not become involved in situations which would constitute a conflict of interest with their commercial relationship with WellWell Medical.

Treating all commercial information as confidential especially in, but not restricted to, their dealings with competitor organisations

Ensuring any gifts provided to customers, including WellWell Medical, be of nominal value

Not offering to WellWell Medical staff members paid travel expenses, accommodation or conference registration without the consent from the WellWell Medical staff member's CEO to do so

Restricting any market sensitive information obtained from WellWell Medical to only those employees within the Supplier organisation with a direct 'need to know'

Not making disparaging, untrue or misleading statements about WellWell Medical, WellWell Medical Employees, competitors, customers or other industry participants

Environmentally sustainable business practices

WellWell Medical recognises its corporate responsibility to respect and improve the environment in which we work and live. WellWell Medical is committed to meeting all legislative environmental requirements, to minimising pollution and waste and to achieving continual improvement in environmental performance.

In addition, WellWell Medical is committed to:

Seeking to continuously reduce water usage within the requirements of delivering high quality health care and as far as practicable maximising efficient water management

Identifying and reducing waste, and conserving resources through adopting sustainable purchasing principles where clinically appropriate and commercially viable, and encouraging suppliers and contractors to address environmental management and performance

Reducing energy consumption and minimising greenhouse gas emissions

Providing education and training to WellWell Medical staff and Suppliers on environmental matters including waste reduction strategies

Visiting Supplier and service provider sites to conduct inspection audits

Planning disaster mitigation strategies to reduce adverse environmental outcomes

WellWell Medical expects that its Suppliers will adopt a similar approach to ensuring they conduct their business operations in a manner that promotes environmental sustainability, adheres to all relevant laws and regulations and aims to reduce waste. When choosing significant suppliers, a formal assessment is made of their environmental policies and credentials.

Respect for the individual

One of WellWell Medical's Core Values is to 'Treat Each Other with Respect and Honesty', with the objective of growing a workplace where trust, team spirit, and equity are an integral part of everything WellWell Medical does.

In building commercial relationships with Suppliers, WellWell Medical expects those organisations to adopt a similar approach to treating all individuals with which they interact, including employees and customers, with respect and dignity.

More specifically, this includes:

- Adherence to all relevant laws and regulations in relation to non-discrimination, equal opportunity, sexual harassment and human rights
- Acting in accordance with international human rights principles, including those concerning slavery and child labour and the principles contained in the UN Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work. WellWell Medical will not tolerate slavery or human trafficking, or abusive or unfair treatment in any part of its own business or in any of its supply chains
- Providing a safe, healthy and comfortable workplace, including compliance with all relevant workplace health and safety laws and regulations, as well as abiding by the safety principles of each WellWell Medical entity with which the Supplier has a relationship
- Maintaining a blame-free work environment where employees are encouraged to report misconduct, illegal or inappropriate behaviour free from any threat of reprisals or other adverse consequences (refer to WellWell Medical's Whistleblower Policy on its website)
- Providing and supporting freedom of association for employees to join trade unions and other employee representative groups and for those groups to bargain collectively on behalf of employees
- Employing only those individuals with a legal right to work in that jurisdiction
- Complying with all relevant laws and regulations in relation to legal minimum rates of pay and other conditions of employment for workers, such as fair working hours, meal and rest breaks and other conditions designed to enhance employee health and safety

- Prohibiting physical abuse, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation in both the workplace and in relationships with customers
- Treating staff fairly and equitably, including providing written confirmation of their terms and conditions of employment
- Ensuring all employee entitlements and prescribed conditions of employment under relevant laws and regulations are adequately implemented and accounted for

WellWell Medical expects its Suppliers to maintain their own ethical sourcing policies and to apply these standards to their own business, across all of their workers, suppliers and any sub-contractors engaged in their supply chain.

When selecting Suppliers, WellWell Medical undertakes an assessment of their social policies and credentials, particularly their compliance with modern slavery laws. WellWell Medical may require Suppliers to provide evidence of their own ethical sourcing policies and compliance with those policies.

WellWell Medical reviews Supplier compliance through a formal assurance program, including formal internal audits, undertaking supplier risk assessments and undertaking performance review meetings. WellWell Medical reserves the right to report violations, non-conformances and actions taken in the annual Corporate Responsibility Report.

WellWell Medical seeks to work with Suppliers who share these principles and who are prepared to commit themselves to meeting the requirements of these principles. WellWell Medical is committed to working with Suppliers to support necessary improvements, however it will also take action if Suppliers do not meet the requirements of this policy and other related standards.

Adherence to customer's procedures

WellWell Medical has developed a set of procedures to enhance and streamline commercial relationships with Suppliers and to protect Suppliers' safety when on site in WellWell Medical sites and other locations. WellWell Medical expects Suppliers to adhere to these procedures.

These include:

- Maintaining a current and valid insurance program that continues for the duration of the supply contract with WellWell Medical. This includes, as a minimum, liability cover for professional indemnity, public liability and workers compensation
- Developing and implementing a safe system of work and providing evidence of this to WellWell Medical and its entities upon request
- Adhering to the safety standards of each WellWell Medical entity which may include registration when visiting on site, familiarisation with the location specific requirements prior to conducting work, reporting incidents that occur at any WellWell Medical site, adhering to the Supplier's safe systems of work

- Adhering to the procurement policies of WellWell Medical, which include referring all pricing, contractual and other commercial matters to the WellWell Medical procurement department in the relevant jurisdiction