

Changes have been made to the Code of Ethics since the social, ethics and transformation committee meeting in March 2016 relating to the vision on pages 7 and 10 and to resources on pages 47-51



Code of Ethics.

Living our Values.



Q^e quality in everything we do

Message from the Life Healthcare Group Chief Executive Officer.

Life Healthcare has always maintained very high ethical and legal standards and has earned the reputation of being a very responsible and respected player in the South African healthcare industry. Protecting and maintaining this reputation is particularly important in our industry where ethical and legal behaviour is accepted as a general norm.

Recent worldwide developments in the corporate environment have also firmly placed the spotlight on legal and ethical business practices. All stakeholders increasingly scrutinise business decisions and actions taken by both management and employees of corporations. Life Healthcare will be no exception in this regard.

Balancing business decisions with legal and ethical considerations can become very complex and none of us can have all the answers all the time. To assist all of us, who conduct business on Life Healthcare's behalf, the company has developed a Code of Ethics, which brings together a set of universal standards. This helps define what is expected of us, and what are considered appropriate actions. We have attempted to make the Code as comprehensive as possible and I urge you to ensure that you understand the content of the Code and apply it in your day-to-day work situation. The Code of Ethics is reviewed annually by the social, ethics and transformation committee which is a sub-committee of the board as part of its oversight responsibility.

Should you find yourself in a situation where you are unsure of the correct course of action or become aware of violations of the Code please discuss this with your manager or make use of the helpline.

Thank you for your continued support of ethical business practices and the Code.

A Meyer

How the Code of Ethics is structured.

The diagram below depicts the layout of the Code.

Introductory items: <ul style="list-style-type: none">• Code of Ethics does not alter conditions of employment• Introduction to the Code• Using the Code• Asking questions and raising concerns• Where to go for help• Code of Ethics Programme
Detailed content of the Code
<i>Our responsibility to customers, suppliers and markets</i>
<i>Our responsibility to the board and to shareholders</i>
<i>Our responsibility to and expectations of employees</i>
<i>Our responsibility to communities and the public</i>

Please consult the table of contents to locate the detailed items pertaining to each section.

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The Code of Ethics does not alter conditions of employment.

The Code of Ethics does not alter terms and conditions of your employment. Rather, it helps each of us know what is expected of us to make sure we always act responsibly and with integrity while being accountable for our actions.

Introduction to the Code of Ethics.

The Code of Ethics and Life Healthcare's Values

The Life Healthcare leadership guide sets out a number of Corporate items including:

- The company vision and purpose.
- The company values.
- How the brand was conceptualised.
- The matrix organisation structure of the company.
- The importance of ethics.

The Code of Ethics builds on this early document and sets out the details of the standards required within the Life Healthcare business with regard to honesty and ethics.

The Company Vision

The vision of the company is to be:

"A market leading, international, diversified healthcare provider"

The Company Mission

"We improve the lives of people through the delivery of high quality, cost effective care"

The Company Purpose

The Company's purpose which underpins the brand, is:

"Making Life better"

The Life Healthcare Values

There are five values:

- **Passion for People:**
 - People are the life of our business:
 - Our staff.
 - Our doctors.
 - Our patients.
 - Our communities.
- **Quality:**
 - Our quality focus is to provide world class medical treatment, high quality care, and a professional service, with compassion in all our facilities.
- **Performance Pride:**
 - To take proactive responsibility for performance and engender a personal reassurance that people in the company act for the right reasons, with quality in mind.
- **Personal Care:**
 - Personal care is an individual commitment to put a human touch and interpersonal sincerity into the service we provide.
- **Lifetime Partnerships:**
 - Partnerships lie at the heart of our business today and in the future (doctors, healthcare providers and business partners). Partnerships build business value and long-term relationships. Partnerships ensure our relevance in the communities and environment we serve.

These are encouraged within the grounding ethos of “dignity for all we serve, and dignity for all who serve.”

Each value is expressed in more detail in the Leadership Guide which is available on the Life Healthcare Gateway.

Preamble to the Code of Ethics

Ethics in business is becoming more vital to assure investors, customers, partners and staff that policies, decisions and business practices are honourable, open and taken within a sound ethical and values based framework.

The Code of Ethics is a foundation document. It along with other company policies and the company values act as a guide to all Life employees as to how to conduct themselves in

business dealings. It also helps with understanding the parameters allowed in dealing with difficult decisions that are often not clear cut.

The Code of Ethics is a responsibility which all employees and other stakeholders of Life Healthcare are bound by, not just because it is policy, but because it seeks to set out “the right thing to do.”

The Code also seeks to align its content and standards that are set with the requirements of King III and the JSE. These will evolve over time and therefore the Code is a living document.

Finally, the Code of Ethics helps embed the values of Life Healthcare in daily management practice in the organisation.

Purpose of the Code of Ethics

Life Healthcare’s Code of Ethics sets out the principles and standards that guide the way we do business. We call this ‘living our values’ because our standards are not simply words on a piece of paper, but ways of ensuring we consistently and instinctively do the right thing.

Our business brings with it obligations to comply with the law, adhere to our own policies and principles, exercise good stewardship of our assets and the environment, provide quality products and services to our customers and behave safely and ethically at all times.

Our organisation has a tradition of pursuing these goals and conducting business with an eye on the needs of the future.

The Code of Ethics brings together a set of universal standards, helping to define what we all expect of our businesses and people regardless of location or background. These standards are not entirely new – they update, revise and summarise in one convenient place policies we have adhered to for many years.

All employees must follow this Code of Ethics. By doing so, they will ensure that their activities strengthen the business and support Life Healthcare’s values. Failure to follow the Code of Ethics is taken very seriously and could result in disciplinary action up to and including dismissal. See the section on “Your personal responsibility to do the right thing – how the Code of Ethics will be enforced”.

Why we need the Code of Ethics?

Failing to follow this Code of Ethics can expose Life Healthcare and its employees to serious harm – harm to the business, environment, our customers and the reputation we all have worked hard to earn. We are also exposed to penalties and even imprisonment of individuals in serious cases of misconduct. In short, acting responsibly is important and requires ever more care given the changing corporate environment.

We need the Code of Ethics, to clarify areas of uncertainty so that employees always have a source of guidance.

The Code of Ethics as a practical guide

The Code of Ethics provides the foundation for our organisation's practices and standards. It outlines how we expect our people to treat our customers, suppliers and markets, our fellow employees, our shareholders, and the communities in which we work and live. In the current business environment, we are faced with a situation that requires business decisions to be taken with sensitive consideration of laws and ethical issues. To this end the code:

- Summarises the legal and ethical standards that affect us all.
- Details standards that have a universal application.
- Outlines our obligations to, and expectations of our stakeholders.
- Helps us identify key risk areas and how those risks should be approached.
- Gives us guidance on how we should resolve difficult questions about business conduct.
- Directs employees to the resources they will need to judge appropriate conduct and to seek help or further advice.

The Code of Ethics is essentially a guide. It fits with Life Healthcare's culture of positive education, training, personal development and encouragement. However there are times when guidance is not sufficient and stronger incentives or sanctions are needed to ensure adherence to the Code of Ethics. All employees are expected to understand and follow the Code of Ethics, its principles and the related standards.

Setting the tone for our Code of Ethics

As a major player in the South African healthcare industry we have established a vision of "To be a market leading, international, diversified healthcare provider" and a mission of "We improve the lives of people through the delivery of high quality, cost effective care". We need to direct all our business efforts towards achieving this vision and mission. All our business endeavours however need to be conducted within the framework of legal and ethical standards. This has always been very important and legal and ethical considerations have always been part of our behaviour.

Worldwide developments relating to the ethical and legal behaviour of companies has placed business under scrutiny and necessitates even greater emphasis on ethical and legal compliance. This is specifically true in the world of medicine, the industry in which we operate. Doctors, Medical Aids, Pharmaceutical Companies and Private Healthcare Providers are continuously taken under review.

Adopting, following and enforcing the Code of Ethics is thus of crucial business importance to Life Healthcare.

Using the Code of Ethics.

Our stakeholders

Our Code of Ethics has been developed to reflect the expectations of six stakeholder groups. Our stakeholders are people with an abiding interest in Life Healthcare:

- **The Board of directors** who understand that through the implementation of the Code of Ethics, that Life Healthcare subscribes to the highest standards of governance and accountability and that governance is based on an ethical foundation.
- **Customers** who are satisfied and feel understood. They include our patients, their families, doctors and funders.
- **Suppliers** who appreciate us because we are challenging but fair.
- **Shareholders** who expect the best endeavours of our organisation to maximise the value of their investment.
- **Employees** who work with enthusiasm and pride because they feel challenged and valued.
- **Communities** in which we play a practical and positive role, and that appreciate our involvement and contribution.

Who must follow the Code of Ethics?

The Code of Ethics applies to all employees as well as all representatives, consultants and agents doing business on our behalf.

Your personal responsibility to do the right thing

The Code of Ethics is a key part of our commitment to doing what is right. As a Life Healthcare employee you must therefore understand and follow the principles and standards of our Code of Ethics. Those that do not follow the Code of Ethics put themselves, their co-workers and the company at risk.

A failure by an employee to comply with the Code of Ethics or any other company policy or requirement, may result in disciplinary action up to and including dismissal, referral for criminal prosecution and legal action to recover losses or damages resulting from such violation.

What are the responsibilities of those who supervise others?

Those who manage or supervise others in Life Healthcare have additional responsibilities.

They must:

- Support a work environment where ethical conduct is recognised, valued and exemplified.
- Ensure that their employees have adequate knowledge and resources to follow the Code of Ethics.
- Support employees who raise questions or concerns in good faith about ethics and legal compliance.
- Monitor and enforce compliance with these standards.
- Set a good example and encourage others to do likewise.

Does the Code of Ethics explain all the standards I need to know?

The Code of Ethics is the centrepiece of our ethics and legal compliance programme, but it cannot describe in detail every law and policy, standard or practice that may apply.

Each employee must learn the standards, policies and practices that apply to his or her job and understand that the principles underpinning these standards should be applied to all our business dealings. To learn more about any additional ethical or legal standards that may apply to you, please ask your supervisor or consult any of the resources identified throughout this document with the ⓘ symbol. A summary of the resources are provided in the Information Resource Table at the end of this document.

Life Healthcare provides training and support material in addition to the Code of Ethics. This information can be obtained using our intranet-based tools, the Head of Internal Audit and the various HR sites, by requesting information through your supervisor or the department responsible for the area in question.

What about different laws in different countries?

Life Healthcare primarily does business in South Africa but we do business in other parts of the world, this means that employees will be subject to the laws of different countries and organisations. Each of us must know and follow the laws that apply to us where we work. The Code of Ethics sets minimum standards of behaviour for each of us in addition to the requirements of local law and regulation. In addition to the Code of Ethics we will, if required, develop local supplements to assist employees working in foreign countries.

If you are unclear about the laws that apply to your activities, please discuss this with your supervisor, or contact any of the resources identified throughout this document with the ⓘ symbol.

Key steps to maintaining standards

- Know what is right.
- Do what is right – always.
- If you are ever unsure, ask.
- Keep asking until you get a satisfactory answer.

Asking questions and raising concerns.

The importance of speaking up

We cannot maintain our high standards of integrity if Life Healthcare employees do not speak up if legal and ethical compliance issues have been ignored, are in danger of being ignored or should be addressed proactively.

We should all feel encouraged and secure in reporting any concerns we may have. That is why, in addition to knowing the legal and ethical responsibilities that apply to your job, you are also required to speak up.

This is especially true if:

- You are ever unsure about the proper course of action and need advice, or
- You believe that someone may be doing – or may be about to do – something that violates this Code of Ethics.

If you are in any doubt, start by asking yourself some simple questions. Is the action you are concerned about legal? Does it break any company or industry rules? Does it seem fair – from a competitive and commercial standpoint? Does it expose the company to any unacceptable risks? What would others think about this action – your manager, colleagues, your family? Does it feel right?

The Helpline

It may seem easier to keep silent or look the other way. But our commitment to integrity means we should never ignore legal or ethical issue that needs to be addressed. A **Confidential Helpline** handled through an independent intermediary, supported by our non-retaliation policy allows you to remain anonymous.

For more information, see the non-retaliation section of this document.

Where to go for help.

Who should I contact for help?

If you have a question or concern about ethical or legal standards, what should you do? You have several options. The important thing is to use at least one of them.

Approaching your supervisor is usually the right place to start.

You may also get help or advice from:

- Your supervisor's supervisor.
- The head of your department.
- Your Human Resources (HR) representative.
- The Internal Auditing Department at Head Office.
- Your local safety, health, environment and quality (SHEQ) officer.
- The SHEQ Department at Head Office.
- The Nursing Department at Head Office.
- The Procurement Department.
- Life Pharmacy Management Services.
- Our existing alternative dispute resolution programme.
- Legal Services.
- The Life Healthcare Helpline.

The most effective people to approach are generally those closest to the issue/s in question. Or, if you are not comfortable about approaching these people directly, you may seek guidance from any other resource identified by ① in this Code of Ethics or call the Helpline. A list of reference documents and contact persons is provided at end of this document.

Additional resources, including the Helpline

At Life Healthcare we want to foster an environment of open, honest communication.

But there might be an occasion when you feel uncomfortable about going to a manager, HR, Legal Services, or using any of the other resources identified in the Code of Ethics to raise a legal or ethical compliance issue. We have created some additional resources that can help, including a Helpline.

You can call anonymously...

Its purpose is to receive questions and concerns about legal compliance, ethics and the Life Healthcare standards described in this Code of Ethics.

Calls to the Helpline are answered by an independent company that helps businesses respond to concerns about potentially unethical and illegal acts. If you wish, your call to the

Helpline can be made anonymously. The Helpline has procedures to enable this.

The Helpline telephone number is free to call from anywhere around the country. The number is **0800 005 072**.

At all times, confidentiality will be maintained consistent with the best interests of the employees involved, our company and our company's obligations under the law.

Inquiries to the Helpline receive a prompt response

Every effort will be made to give your call to the Helpline a quick response, especially when circumstances make that important. If, as a result of your call, the company undertakes an investigation, we will look into the issue promptly and, if appropriate, ensure that corrective action is taken. The Helpline assigns tracking numbers so those employees who do not want to give their name can still check back with the Helpline to receive a response or provide additional information.

Retaliation will not be tolerated

Life Healthcare has a policy of non-retaliation.

We want to encourage individuals to come forward with any ethical or legal concerns or questions. That is why our organisation strictly prohibits retaliation, in any form, against anyone who, in good faith, reports a concern, makes a complaint or reports a possible violation of the Code of Ethics.

Anyone responsible for reprisals against individuals who report suspected misconduct or other risks to the business will be subject to disciplinary action up to and including dismissal.

Question: I have been thinking about calling the Helpline, but I'm not sure if I should. My supervisor told me to do something that I feel is dangerous, unethical and may even be illegal. I think I should tell someone who can look into this, but I'm afraid that my supervisor will make my job difficult for me if I do. What should I do?

Answer: Even in great companies, people sometimes do things they shouldn't. What your supervisor has asked you to do may in fact be unethical or illegal. If you call the Helpline, our organisation will look into the situation and will not allow your supervisor or anyone else to retaliate against you. The right thing to do is report your concerns.

The Code of Ethics programme.

The Code of Ethics programme

Our Code of Ethics is more than just a description of our business principles and values. It is the centrepiece of a company-wide programme supported by our board of directors and senior managers.

Our responsibilities to customers, suppliers and markets.

Our commitment

In all our business dealings, Life Healthcare strives to be honest and fair. We will always act in line with all applicable laws and regulations in the jurisdictions where we conduct business. We will vigorously but always fairly compete, complying with all laws protecting competition and the integrity of markets.

Competing fairly and within the Competition Act

Life Healthcare strictly adheres to the Competition Act of 1998 ^① (the “Competition Act”). The purpose of the Competition Act is to promote and maintain competition in South Africa in order:

- To promote the efficiency, adaptability and development of the economy;
- To provide consumers with competitive prices and product choices;
- To promote employment and advance the social and economic welfare of South Africans;
- To expand opportunities for South African participation in world markets and recognise the role of foreign competition in the Republic;
- To ensure that small and medium-sized enterprises have an equitable opportunity to participate in the economy, and
- To promote a greater spread of ownership, in particular to increase the ownership stakes of historically disadvantaged persons.

Facts about the Competition Act

The stipulations of the Competition Act are complex. The stipulations of the Competition Act are complex and thus all employees must abide by the basic rules of competing fairly listed in the section below.

Penalties are severe. The penalties prescribed in the Competition Act for any person convicted of an offence varies from R2 000 to R500 000 as well as imprisonment of six months to ten years.

Careless conduct can lead to violations. What might appear to be ordinary business contacts, such as a lunch discussion with a competitor’s representative or a conversation at an industry trade association, can lead to a Competition Act violation. A seemingly innocent exchange can be viewed as an attempt to manipulate the market or to send a ‘signal’ to competitors of a significant change in strategy.

As a result of the above, it is important to remember that:

- All competition law advice provided by Legal Services is privileged and must be saved in an electronic folder marked “Private and Confidential”.
- Any advice required in respect of any competition law issue must be raised with Legal Services.

Basic rules of competing fairly

Basic rules to know:

- Never talk to, or exchange information with, competitors to:
 - Fix prices – this can include setting minimum or maximum prices, or ‘stabilising’ prices.
 - Fix terms related to price, pricing formulas, credit terms, etc.
 - Divide up markets, customers or territories.
 - Limit production or delivery capacity.
 - Rig a competitive tender process, including arrangements to submit sham tenders.
 - Boycott anyone in the marketplace – suppliers, customers, agents, distributors or competitors.
- Because of the risk, never discuss competitive matters with competitors – at any time or any place.

Guidelines for dealing with competition law authorities

The parties responsible for ensuring that South Africa’s competition laws are adhered to are the Competition Commission and the Competition Tribunal.

In dealing with such competition law authorities, it is important to remember the following:

- All correspondence and/or requests received from the competition law authorities must be referred, on receipt of such correspondence and/or requests, directly to Legal Services.
- Legal Services must be immediately notified in the event that individuals representing the Competition Commission and/or the Competition Tribunal arrive at any Life Healthcare business premises.

Guidelines for trade and professional association

Trade associations require a special approach.

Trade and professional associations could for example include the SA Nursing Council, HASA, COSASA and SAAHIP.

Trade and professional associations can perform useful and legitimate functions, such as the enhancement of training practices or safety within a particular industry. But because

trade associations are by definition organisations that place us in close proximity with our competitors, their membership and activities require us to follow special cautionary guidelines.

The 'Trade Association Guidelines' and information on the approval process for memberships of trade associations can be obtained from Legal Services.

Employees should take great care not to engage in discussions or activities that would lead to the allegation or appearance of improper behaviour. Even passive participation in a meeting where a questionable discussion is taking place puts you and our businesses at serious risk. If in doubt, distance yourself from any compromising dialogue, leave the meeting, inform those involved that you are doing so and insist that you leaving the meeting is minuted. Also, promptly inform Legal Services of the situation as a matter of record and seek their advice as to what you should do next.

Competitor joint ventures

Use caution when considering competitor joint ventures.

Joint ventures or other alliances with competitors can also serve legitimate business purposes, such as creating cost-efficiencies (e.g. a production or research and development joint venture). However, because such arrangements are by definition agreements between competitors to work together, such alliances raise special competition issues and can also expose Life Healthcare to allegations of improper behaviour. Any joint venture or other alliance with a competitor should always be reviewed by Legal Services in advance. Legal Services can also provide best practice guidelines for dealing with an approved competitor joint venture partner.

Monopolies and abuse of dominant position

Monopolising, trying to monopolise markets and abusing a dominant position are illegal.

The Competition Act makes it illegal to monopolise or attempt to monopolise a market and regulates, through the Competition Commission, the conduct of companies that attempt to obtain a 'dominant position'. A dominant company may not try to prevent others from entering the market or to eliminate competition. For example, usually competitors set prices to cover their costs – below-cost pricing may appear to be 'predatory'. If there is a reason to price below cost, this should be reviewed with Legal Services to ensure that it is not predatory or in violation of the Competition Act ① .

Take care in creating records that might give the appearance of improper intentions or activities.

Careless records – including emails, voice mails, studies, reports, strategy plans and memos – can create the appearance of misconduct. Be particularly careful when detailing competitive strategies, making sure what you describe is fair, ethical and within the law. Observe Life Healthcare best practices in creating these records. Remember, how it 'looks' can be just as bad as how it 'is'.

Other activities may raise competition issues, such as entering into joint ventures, mergers, acquisitions, marketing, purchasing, swaps, or other collaborative arrangements with competitors.

Consult Legal Services when in doubt

If you have questions or concerns about your responsibilities under the competition laws, please contact your Supervisor or Legal Services for advice on your concerns.

Question: During an industry conference, I found myself in the middle of a conversation with some of our competitors. A senior representative from one competitor suggested that all players in the industry should work together and place pressure on suppliers to ensure the best possible drug prices and so ensure improved margins. What should I have done?

Answer: Report what happened to your supervisor and Legal Services. Government officials might conclude that everyone present during the conversation, whether they said anything or not, had engaged in a “price-fixing” discussion. Because of this risk, if you ever find yourself present during a discussion of prices with competitors, immediately break away from the discussion in a way that makes it clear you consider this improper, and promptly call Legal Services.

Avoiding improper actions against competitors

We work hard to compete and earn new business, but there are some things we do not do because they are considered improper and inconsistent with Life Healthcare’s commitment to integrity.

We do not, for example:

- Disparage or make false statements about our competitors or their services.
- Use unfair tactics against competitors, such as:
 - Stealing or misusing competitors' trade secrets.
 - Paying bribes to help our business or to hurt a competitor.
- Enter into contracts we do not believe we can or will fulfil.

There is a far stronger case for competing fairly. It is always better to compete based on our strengths, tell the truth and focus on providing what the customer wants. Improper or unethical behaviour sooner or later undermines the business and places our organisation’s reputation at risk.

Gathering competitive information

Gathering competitive information, when done fairly, is lawful and necessary to compete effectively. Some forms of information gathering, however, are wrong and can violate the law.

Basic rules to know:

Legitimate sources of competitive information include:

- Newspapers and press accounts.
- Other public information.
- Historic pricing information.
- Trade shows - but not information from competitors – see the section on ‘competing fairly’ above.
- Information publicly available on the Internet.
- Industry surveys by reputable consultants.

Never use the following:

- A competitor’s confidential information.
- Papers or computer records brought by new personnel from prior employers.
- Information marked ‘confidential’, or something similar, belonging to anyone else. Consult Legal Services if you have such information. Even if proprietary information just shows up on your desk, get legal advice.
- Marketing or other business information exchanged with competitors.
- Information about a competitor’s tender if you are involved in tenders especially on government contracts – if you come into possession of such information call Legal Services.
- Information on a competitor that someone has offered to sell.
- Anything else that feels wrong – always seek guidance from Legal Services.

Question: An ex-employee of one of our competitors approached me with an offer to sell me his former company’s five-year strategy plan. I’d like the information, but worry about the legal implications. What should I do?

Answer: Because his offer does have legal implications, say “no” to your contact. A competitor’s non-public business strategy is confidential information and we have a firm policy against using someone else’s confidential information. Make sure your supervisor and Legal Services know about this approach and exactly what was said, and steer clear of any further approaches by this individual. Tell the contact that accepting the information would be against Life Healthcare policy. Legal Services will consider the circumstances carefully and will take the appropriate action to make sure we fully comply with our legal and ethical standards and responsibilities.

Insider trading

Insider trading is defined as trading in listed securities of Life Healthcare or its affected suppliers, either directly or indirectly, by persons who are in possession of ‘inside information’ which is price sensitive and has not been made available to the public.

Life Healthcare is firmly committed to supporting fair and open securities (equities or stock). To ensure we keep this commitment, our employees are prohibited from trading in shares or other securities of Life Healthcare or any publicly quoted company within Life Healthcare, based on ‘inside information’ obtained from their jobs.

‘Inside information’ means that the information is:

- Price sensitive (ie it is likely to influence the share price should it become public information);

- Material;
- Not available and must not have been made available to the public, and
- Obtained or learned as an insider. (The definition of an 'insider' includes, but is not confined to, directors, employees or shareholders of the issuer of financial instruments (ie equities, bonds and warrants to which the information relates)

Material information

What is material information? If a reasonable investor would be likely to consider the information important in deciding whether to purchase or sell a company's shares, this is material. Material information might include significant information, for example, on new contracts, changes in dividends, mergers and acquisitions, earnings statements and forecasts, joint ventures and licensing agreements.

If you have knowledge of this kind of information – and the information is non-public – it is inside information and no Life Healthcare employee may buy or sell, or advise others to buy or sell the relevant shares or other securities using it.

How to obey insider trading laws

Facts about insider trading laws:

Passing material information on is an offence under the law. If you pass inside information on to other organisations or individuals, it is an offence under the law, even if the persons involved do not trade on any stock exchange or in any financial market.

Leaking material information or tipping someone off can violate the law. If you give inside information to someone outside the company who trades in the company's securities, you may be liable for leaking or abusing privileged information – even if you did not personally profit from the trade.

Inside information may be about another company. Material information may also be information you obtained confidentially about another company during the course of your work for Life Healthcare, for example, a customer or supplier.

Penalties are severe. Breaches of insider trading are taken very seriously. Violators can be prosecuted even when the amount involved is small or the person involved in leaking information made no profit at all. Violations can result in serious civil and criminal penalties against the individuals involved. Our organisation's reputation would also suffer by association.

Insider trading - basic rules to know:

Never:

- Buy or sell shares in Life Healthcare or any publicly quoted company within Life Healthcare while in possession of inside information – even if you 'think' you are not relying on it;
- Suggest or tell someone else to buy, sell or retain shares in Life Healthcare or any publicly quoted company within the Life Healthcare Group, or any other company

- while you are in possession of inside information; or
- Disclose inside information to someone outside Life Healthcare, including family members (e.g. your spouse), unless there is a valid business reason and Legal Services has approved of the disclosure.

Be careful:

- Even with other Life Healthcare employees, only disclose inside information to a co-worker when it is necessary for you to do your job and you have no reason to believe the information will be misused;
- Protect inside information from accidental disclosure (eg do not send the information to an unattended fax machine or discuss it in a public place); and
- If you have questions or concerns about your responsibilities under the insider trading laws, please consult both the Life Healthcare Insider Trading Policy and the Life Healthcare Price Sensitive Policy or contact Legal Services for further guidance.

Insider trading - basic rules to know when dealing with analysts:

Never:

- Pass on inside information to analysts even if it is done under an embargo. This is an offence. Analysts are not in a special position to receive this type of information. By receiving inside information, the analyst becomes an insider.
- Pass inside information on, even though the persons involved do not trade on the stock market or in the financial markets. This is an offence under the law 'Deal directly with analysts. Approaches or questions from analysts should be referred to Life Healthcare's board of directors at all times.

Question: One of our suppliers made a confidential pitch to my business unit about a new product they plan to introduce to the market. We decided that the product would not be useful for our company, but I think it could be a real breakthrough for other industries. Once this company finds a suitable partner, I know its value will rocket. I am willing to take a risk on this. May I buy stock in the vendor's company?

Answer: No. You cannot buy the company's stock until the public knows information about the new product. Because the pitch was confidential, there has not been full and fair public disclosure, which is essential. The fact that the new product is not significant to our company is not what counts. If the new product may have an impact on the earnings of the vendor, then the pending introduction of the product is material to that company and you cannot trade on the information until after it is known to the public.

Intellectual property

Just as we take care to protect our own confidential information (see the section headed 'Life Healthcare's Proprietary Information' below), our organisation respects the proprietary, privileged and confidential information of others. This includes written

materials, software and other intellectual property.

Basic rules to follow:

- Do not bring to Life Healthcare confidential information, including computer records from prior employers.
- Do not load any unlicensed software onto a Life Healthcare computer.
- Do not accept or use anyone else's confidential information except under an agreement approved by Legal Services.
- Only copy documents and materials (including computer software) that are not copyrighted, for example, a government report, or when we have specific written permission to do so. Check with Legal Services for a list of copyright licenses.
- Do not include copyrighted materials or third-party trademarks, for example, portions of audio, video and off-the-air recordings, in materials you are producing without specific permission from the copyright owner. Consult Legal Services on whether 'fair use' may allow the use of brief excerpts.
- Do not include copyrighted materials or third party trademarks on internet or intranet web sites without approval of Legal Services.

If you have questions or concerns about intellectual property, including patents, trademarks, copyrights and confidential or proprietary information, please contact Legal Services. The rule of thumb is, if it feels like stealing, plagiarising or borrowing someone else's work, you may be denying another company or individual the credit they deserve. It is also likely you will be breaking the law.

Question: I want to develop a training programme for my business unit on budgeting skills. I attended a very good course on finance for non-financial managers and the module on budgeting would be perfect for this training. I have contemplated making a copy of the material and using it in the training sessions. Should I go ahead? And if not, what should I do?

Answer: You should not infringe any copyright. This is against the law and our own ethical standards and can result in significant damages. If you wish to use other companies' ideas and products, you must act fairly and legitimately. Explore licensing or any other agreements that ensure you do the right thing legally and ethically. Consult with Legal Services before exposing our organisation to claims of copyright infringement.

Advertising and promotions

Our organisation's reputation is one of our most important assets. To help ensure the ongoing trust of our customers, marketing and advertising activities must describe our offerings and services legally, fairly and honestly. Furthermore, Life Healthcare's trademarks must be used consistently and appropriately to avoid loss of our legal rights.

All official advertising and promotions must be approved by management and must always avoid practices that are false, misleading or deceptive. A short-term advantage gained through misrepresentation or exaggeration can jeopardise our continued success. Life Healthcare's reputation is completely in our hands, to be enhanced or damaged by our own statements and actions.

The government as our customer

While integrity is essential in all our dealings with customers, special rules apply when the government is our customer. Those involved in bidding on or providing service under a government contract need to know these rules. Severe sanctions can apply to violations.

To avoid even the appearance of improper conduct in dealing with a government customer:

- Always accurately follow rules for billing the government;
- Never offer anything of value to, or discuss future employment with, a government official involved in approving or managing a contract with the government; and
- Never seek or accept confidential bid information.

Question: We are interested in bidding to provide medical services to state patients on behalf of the Department of Health. There is a bidding process, but one of the procurement officials involved has worked with us before and says the bidding process is just a formality. He suggests giving us some information just to make sure our bid is consistent with what they are “officially” looking for. He says it’s OK because we are clearly the best – this will just make the process go more smoothly. Is this OK? What should I do?

Answer: Accepting this information could be a serious violation of the law subjecting you, the official and the company to severe penalties. Tell the official that accepting the information would be against our policy and the law, and contact your supervisor, Legal Services or any other resource identified in this of Ethics for additional guidance.

International trade controls

Life Healthcare conducts business outside the borders South Africa. Each employee involved with the delivery of products or services across international borders is expected to understand and comply with the applicable trade controls, including import/export restrictions. The requirements of these restrictions are often complex, changing and difficult to understand.

A number of countries have laws restricting the import or export of certain products, services or technologies. In addition, some countries, such as the US, impose trade embargoes against identified countries or parties, the list of which can change from time to time. Substantial criminal, civil and administrative penalties may apply to companies and individual s that violate these laws. If in doubt, discuss procedures and strategy with your supervisor and others with the appropriate knowledge.

Ethical Procurement

Life Healthcare, due to the nature of its business, is extensively involved in the procurement of pharmaceuticals, hospital products, equipment and services. Life Healthcare is widely respected for its ethical approach to procurement and this needs to be upheld.

All staff members involved in the procurement process must ensure that they:

Never:

- Enter into business practices which might reasonably be deemed as improper.
- Accept any personal benefit resulting from goods and services provided to the company by a supplier.
- Provide a supplier or any other party with confidential or other information which might place the supplier at an advantage to secure our business.
- Accept any gifts or hospitality that might influence or be deemed to influence your business decision making.
- Solicit gifts or goods or make requests to a supplier that might in any way be contrary to Life Healthcare's business ethics.
- Accept any bribe from a supplier.

Be careful:

- Of accidentally providing confidential information to other parties by for example discussing confidential issues in public places;
- Accepting any sponsorship from a supplier for company events such as conferences, which might be deemed as creating an unfair advantage over other suppliers; and
- Accepting business gifts or hospitality that are or can be deemed to be of high intrinsic value. Make sure in accepting such gifts that you advise the Procurement Department of its value. Should you have any doubt about accepting a gift, discuss the matter with your supervisor.

Always:

- Avoid situations in which personal interests conflict or may appear to conflict with the interests of Life Healthcare.
- Disclose any personal interest (direct or indirect) which may impinge or be deemed to impinge on your impartiality in business decisions.
- Adhere to the executive constraints in respect of the value and duration of contract
- Ensure that all suppliers are treated fairly and equally in any tender process.
- Check with Legal Services, your supervisor or other relevant parties before entering into any contract with a supplier, to ensure that this falls within your level of authority and that the content of the contract is legally acceptable.

Should you have any questions relating to procurement please discuss this matter with your supervisor or the Procurement Department.

Complying with professional standards

Life Healthcare employs professionals in many different categories who are subject to and must follow the legal requirements as well as maintain the standards set by their relevant professional institutions. Some of these professionals can include Accountants, Psychologists, Doctors, Nurses, Pharmacists, therapists and many more.

These employees must always:

- Where membership to a professional institution is required to practice, ensure that their membership to these institutions is paid up.
- Ensure that their behaviour and professional conduct is in line with the standards, regulations and requirements set by their relevant institutions and legislation.

Due to the nature of Life Healthcare's business it is of particular importance that Nurses and Pharmacists closely abide by the stipulations in the Nursing Act of 1978 and the Pharmacy Act of 1974 and all other relevant legislation [①](#). Non-compliance to these acts could place Life Health care and the individual employees concerned at substantial medical legal risk.

These employees should in addition to the compliance issues stated above, also always:

- Ensure that the work they execute is within their scope of practice.
- Ensure that they have personal indemnity cover.

Question: I work as a Nurse in a surgical ward. My manager has requested that I do some work which I think falls outside my scope of practice. Do I continue to do the work?

Answer: No, you should first discuss this with your manager to determine if you may legally perform these duties. If you are not able to resolve the issue you may discuss this with HR, your APMS Pharmacy Specialist or seek help by calling the Helpline.

Acting as a director

Certain employees will be required to act as a director of the company or a subsidiary. There are very stringent rules and duties that apply to individuals acting as company directors. These are stipulated in The Companies Act of 2008 [①](#). Employees acting as directors must ensure that they are fully informed and understand these duties.

Should you have any questions or concerns about acting as a director of the company or a subsidiary please discuss this with Legal Services or the Company Secretary.

Our responsibilities to the board and shareholders.

Our commitment

Life Healthcare is committed to promoting the interests of our shareholders by working hard to achieve superior financial results. In pursuing this goal, we will protect our organisation's assets and resources, avoid conflicts of interest, and accurately measure and report our financial performance in accordance with relevant laws and regulations. Life Healthcare will assist the board in ensuring that the highest standards of governance and accountability are practised in the conduct of its business to ensure that the delivery of value to shareholders is sustained.

Conflicts of interest

Every employee has activities outside the company and these are important for a healthy work-life balance. But to be successful as a company, we need to make sure our outside activities do not interfere with our work for the company.

A 'conflict of interest' arises when employees' personal, social, financial or political activities have the potential for interfering with our objectivity in performing work for the company. Actual conflicts must be avoided, but even the appearance of a conflict of interest can be harmful, too.

Sometimes, the activities of a close relative, such as a spouse, can also create a conflict of interest or the appearance of a conflict of interest. Employees should exercise care wherever there is a risk of actual or apparent conflicts of interest. If you have an actual or possible conflict of interest, always disclose it to your supervisor and get prior permission before entering into the situation.

Examples of areas where conflicts of interest arise:

Outside employment and affiliations. Life Healthcare employees can obtain permission from the company to work for other organisations such as nursing agencies, but doing so should not interfere with an employee's Life Healthcare responsibilities. For example, working for nursing agencies may never be performed during the established Life Healthcare workday. Rather, your established Life Healthcare work schedule should be fully dedicated to your responsibilities as an Life Healthcare employee. In addition, you should ensure that time commitments required by any outside employment or affiliation do not infringe upon or adversely affect your ability to perform the responsibilities of your position with Life Healthcare.

Life Healthcare employees working for nursing agencies may end up working in the hospitals of competitors. This in effect raises an immediate conflict of interest. Under these circumstances the employee must take extreme care to avoid discussing any confidential information or sharing work practices applied in Life Healthcare business units. See the section on "Life Healthcare Proprietary Information". The same applies to working for an

organisation that is seeking to become a competitor, customer or supplier.

Always discuss outside employment with your supervisor first and ensure formal permission has been granted.

Your relatives' places of work are not of concern to Life Healthcare except for one rule: a relative should not have any business dealings with you or with anyone who reports to you. Employees should think carefully about actual or possible conflicts between relatives and anyone working in your business unit or in a similarly close association. Also, be careful not to disclose any confidential Life Healthcare business information to relatives.

Occasionally, Life Healthcare employees wish to engage in **volunteer work for a business organisation** or are asked to serve on the **board of directors** of another organisation. These positions can, in some cases, raise conflicts of interest or even legal issues. If any such involvement could raise a conflict of interest (such as board membership of an organisation with which we do business), you should discuss the situation with Legal Services.

Employees and investments

Taking care with investments

Life Healthcare employees and their immediate family members, such as a spouse or child, need to be careful that their investments do not create conflicts of interest or the sense of a conflict. Conflicts can occur if investments are made in:

- Competitors.
- Suppliers.
- Customers.
- Land, buildings, plant or personal property in which Life Healthcare has an interest.

Investments of this kind may impair an employee's ability to make objective decisions on behalf of the company. Usually, whether an investment creates a conflict of interest is a matter of careful consideration and good judgement. When deciding whether an investment might create a conflict, ask yourself these questions:

- Would it affect any decisions I make at work?
- How would it seem to others inside Life Healthcare, such as my co-workers? Would they think it might affect how I do my job for the company?
- How would it look to someone outside Life Healthcare, such as a Life Healthcare customer, stockholder or even the newspapers?

Note: ownership of less than 1% of the shares of a publicly quoted company usually is not a problem. But, if in doubt, please check with Legal Services.

If you think you may have a conflict of interest, please carefully consider the questions above. Is there a danger your activity is legally or ethically at odds with Life Healthcare's Code of Ethics? If so, promptly discuss your concerns with your supervisor. Many conflicts of interest can be resolved, but they must be dealt with on an open, honest and prompt basis.

Procurement and purchasing employees have

special responsibilities

Employees involved in procurement and purchasing for Life Healthcare have special rules for conflicts of interest. If you are involved in purchasing or procurement for the company, please make sure you know and follow these rules.

Question: My cousin runs a company that provides goods and services to Life Healthcare. I've recently been promoted so that I now make decisions that could influence our purchasing practices and choice of supplier. This has never been a problem before because I was in a different area of the business. Now I'm worried because my cousin might expect favourable treatment and I don't want any suggestion of impartiality. What can I do?

Answer: You are right to think about how the changed circumstances could affect your business relationships. Share your concerns with your supervisor – in writing if necessary. Discuss and resolve how you should best deal with this relationship and inform all parties so that you can preserve your objectivity and impartiality.

Accurate and complete books and records

Keeping accurate information

Our credibility is measured in many ways. One important way is the integrity of our books, record keeping and financial reporting. Every employee must help to ensure that reporting of business information – computerised, paper or otherwise – is accurate, honest and timely. This includes timesheets, vouchers, bills, payroll and benefits records, regulatory data, performance evaluations and other essential company information. Failure to keep accurate and complete records can be construed as a financial irregularity or fraud.

All employees must:

- Ensure all payments, receipts and other transactions are properly authorised and accurately and completely recorded in accordance with generally accepted accounting principles and the company financial procedures.
- Ensure that transactions are authorised within the limits stated in the Corporate Governance Limits of Authority ①.
- Ensure that no undisclosed or unrecorded account, fund or asset is established or maintained. Ensure all company assets are properly reconciled against itemised company reports.
- Never deliberately make a false or misleading entry in a report, record or expense reimbursement form.
- Never suppress, alter or destroy company records without authorisation.
- Never provide false or misleading information to our auditors or try to influence others to do anything that would compromise the integrity of our financial records or reports.

Those with responsibility for overseeing our organisation's financial accounts and records must ensure proper controls. Senior financial officers and others responsible for the accuracy of financial reporting have an additional responsibility to ensure that proper controls are in place to achieve accurate and complete financial and management reports.

The accuracy of all our books and records is critically important. If you have questions or concerns about financial records and reports, please advise your supervisor or call the Helpline. Also consult the Life Healthcare finance policy.

Question: A colleague constantly overstates his fuel expenses and the distances he has to drive on company business. I can't stand to see him get away with it any longer.

Answer: Even if this activity has been going on for some time, it is never too late to stop it. What starts out as a minor misdemeanour – like mis-declaring expenses - can escalate very quickly into a major infraction. You are right: no one should indulge in these sorts of activity, and it is up to each of us to take a stand against bad practice and unethical behaviour. After all, this misrepresentation is a kind of theft. And, you are right, it's not fair to the company or fellow colleagues. It lets us all down.

If you have concerns about false expenses or any other fraud, please communicate them to your supervisor or contact the Helpline.

Life Healthcare's proprietary information

Life Healthcare produces non-public ideas, concepts and information that are valuable 'proprietary' assets or intellectual property. 'Proprietary' means Life Healthcare owns these assets, much like other kinds of property. Various laws allow us to protect proprietary information from use by others. Examples of proprietary information are our:

- Marketing plans.
- Employee personnel records.
- Business ideas, processes, proposals or strategies.
- Corporate purchased or developed software.
- Staffing practices and processes.
- Conceptual business models.
- Training programmes.
- Actual or potential patents, copyrights or trademarks.

All of us must protect the confidentiality of proprietary information. This helps make sure that we, as a company, protect our financial and intellectual investments and reap the benefits of our own hard work.

There are times when sharing proprietary information with persons outside of Life Healthcare is appropriate (eg. so that a consultant the company has hired can assist us). However, disclosures like this should only be made under a written confidentiality agreement approved by Legal Services.

Company opportunities

During the course of work, employees often are presented with opportunities to initiate or expand the company's business. Because these business opportunities come from our work for the company, they belong to Life Healthcare, not the employee. Employees are prohibited from using Life Healthcare property or information for personal gain, such as by taking for themselves business opportunities they learn about through their jobs.

Company time

To be successful, we must all make the best use of our time and that of our co-workers. Among other things, this means we should never allow our outside interests to interfere with our job responsibilities, and we should always truthfully and accurately report our work hours.

Company property

All employees are responsible for using good judgement and care to ensure Life Healthcare's assets are not damaged, misused or wasted. Company assets are intended to help employees achieve business goals. Careless, inefficient or illegal use of company property hurts all of us. We also have a duty of care to report the abuse of company property by others.

Always ensure that all company assets are properly protected and never sell, transfer or dispose of company assets without proper documentation and authorisation. You may find further details about your responsibilities when handling company assets and time in your personal contract (if you have one) or by contacting the HR department.

Company funds

How we use company funds impacts our profitability, so please follow a simple rule: protect Life Healthcare's funds as you would your own, guarding against misuse, loss, fraud or theft. This includes making sure that all claims, vouchers, bills and invoices are accurate, proper and timely.

Company funds include both cash and its equivalents, such as currency, cheques, postage, charge cards, bills, vouchers and reimbursement claims.

Computer and network security

Computer hardware, software and networks are the backbone of our information and communications infrastructure. For this reason, we must all work to protect:

- Information used to access our networks, including ID's and passwords, pass codes and building-access key cards; and
- Computer systems, including corporate data, electronic communications and application software.

You should know that electronic communications to and from the company are not necessarily private. Subject to the requirements of the law, records of your electronic communications may be made and used for a variety of reasons. Keep this in mind and exercise care when you use electronic mail.

Investor relations and the media

Responsibilities regarding disclosure and corporate governance

Shareholders, financial analysts, creditors and other members of the public rely on us to provide them with reliable information regarding the company's operations, performance and outlook. Individuals authorised to speak to investors and analysts on behalf of Life Healthcare may not provide them with unpublished price-sensitive information on a selective basis. Rather, we must provide all members of the public with equal access to the same honest and accurate information.

Only Life Healthcare employees specifically authorised to do so may respond to inquiries from members of the investment community (e.g. shareholders, brokers, investment analysts, the press etc).

For more details about investor relations procedures, please discuss this with the Communications Department.

Press inquiries also require co-ordination and special handling. Please forward inquiries to the corporate communications department.

Question: What should I do if a financial analyst or journalist asks me a question that might influence our share price?


Answer: Unless you are authorised to do so, never get drawn into a conversation, however informal, about price-sensitive information. Price sensitive information includes any unpublished financial results and material on future mergers, acquisitions, joint ventures, alliances, internal programmes or innovations. See also the organisation's insider trading policy. There are proper channels for the release and distribution of this kind of information that we must adhere to. Always direct financial and governance enquiries to the Group director, investor relations.

Our responsibilities to and expectations of employees.

Our commitment

Life Healthcare is committed to fostering a workplace that is safe and that is founded on fair employment practices and mutual respect.

Equal employment opportunity

To help ensure our company attracts and retains the most qualified people, Life Healthcare embraces the principles of equal employment opportunity and a working environment free from all forms of unfair discrimination. We will follow all applicable stipulations of the Employment Equity Act of 1998  with the purpose of:

- Promoting the constitutional right of equality.

- Eliminating unfair discrimination in employment.
- Ensuring the implementation of employment equity to redress the effects of discrimination.
- Achieving a diverse workforce broadly representative of our people.
- Promoting economic development and efficiency in the workforce.

Never:

- Make comments which are or can 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.
- Be part (even passively) of a discussion which can be construed to be discriminatory based on any of the above mentioned.
- Take action based on a bias relating to any of the above mentioned.
- Subject employees to medical testing unless legislation permits it or it is justifiable in the light of medical facts or is an inherent requirement of a job.
- Subject employees to psychometric testing which has not scientifically been shown to be reliable and valid.

Be careful:

- When appointing new employees, ensure that full consideration is given to the Life Healthcare employment equity and affirmative action plans and policies.

Always:

- Provide accurate and timely information required for the employment equity reports to be submitted to the Department of Labour.
- Have summaries of the Employment Equity Act displayed as a reference for employees.

As part of our equal opportunity endeavours we will continue to provide employees with training and development opportunities which will grow competency levels to the benefit of both employees and our company. These training and development programmes will be outcomes based and where possible linking to the National Qualifications Framework (NQF). Training conducted in the company will be done in the spirit of the Skills Development Act of 1998 [①](#) and the South African Qualification Authority Act of 1995 [①](#).

Question: During tea-time two of my co-employees pass some rude comments that are clearly racially motivated about a new manager appointed in our department. What do I do?

Answer: Distance yourself from the discussion and report the matter to your supervisor, HR or the Helpline.

Harassment-free work environment

Treating others as you would want to be treated.

Life Healthcare will seek to ensure an environment free from discrimination and all kinds of harassment, or personal behaviour not conducive to a productive work climate. Harassment is defined as any inappropriate conduct which has the purpose or effect of:

- Creating an intimidating, hostile or offensive work environment.
- Unreasonably interfering with an individual's work performance
- Affecting an individual's employment opportunity.

Sexual harassment can include unwelcome sexual advances, request for sexual favours, suggestive or sexual jokes and innuendoes and remarks or physical contact or conduct of an intimate or sexual nature. Our organisation prohibits any form of harassment including harassment in relation to gender orientation, racial or religious beliefs in any company workplace towards employees, contractors, suppliers or customers.

To ensure Life Healthcare always remains a productive and positive place to work, harassment in any form, discriminatory conduct, jokes, slurs or other remarks that encourage or create an offensive or hostile working environment, do not belong anywhere in our organisation.

Whatever the form of harassment, Life Healthcare takes it very seriously. It simply has no place in our company, and may result in disciplinary action up to and including dismissal.

Reporting harassment concerns

If you have any harassment concerns, please report them. Our company strictly prohibits any form of retaliation against anyone making such a report in good faith. See the sections on 'retaliation will not be tolerated' and the Helpline.

Question: My supervisor is a bully and he makes one of my female colleagues very uncomfortable with his flirting and innuendoes. No one has the confidence to confront him about his conduct. Is there something we can do about this?

Answer: Yes, there are a number of options open to you. You can approach your supervisor's supervisor. You can contact human resources or you can call the Helpline to ask for assistance. If you wish you can call anonymously. Remember Life Healthcare does not tolerate harassment or any retaliation by your supervisor against you or your colleagues if you register a complaint or concern in good faith.

Threats and violence

Threats and violence undermine the work environment.

A safe and secure work environment also means a workplace free from violence. Threats (whether implicit or explicit), intimidation and violence itself have no place in our organisation and will not be tolerated.

Safety, health and security of employees, patients, doctors and visitors

Life Healthcare is committed to managing a safe, secure and healthy working environment. The safety of our employees, patients, visitors, doctors, suppliers and local communities,

and the protection of the physical environment in which we operate is a very high priority. Consistently good conduct and continuous improvement in these areas is a fundamental goal of our company, and it is pursued as an integral feature of all business processes and programmes.

Life Healthcare aims to have a world-class safety and quality record in which:

- Safety and quality is a prerequisite to any business we undertake.
- We are committed to zero tolerance of accidents and incidents.
- Safety and quality is an important key performance indicator (KPI) of any business and individual.
- We are committed to continuous improvement.
- Safety and quality performance is pursued through adherence to regulatory requirements, Life Healthcare's set standards and systems and the company's behavioural safety and quality process. Please refer to the Life Healthcare SHEQ policy.①

World-class safety and quality is only possible if the whole organisation embraces the processes and behavioural requirements of the organisation's safety programme. Our employees are required to know what is expected of them, to support this programme – and where appropriate show leadership in encouraging and embedding safety principles.

In striving for a safe, secure and environmentally sound workplace, we will comply with the letter and spirit of the Occupational Health and Safety Act of 1993 (OHS Act) ① and the National Environmental Management Act .

Employees should Always:

- Maintain a safe and environmentally sound workplace.
- Perform against agreed key performance indicators (KPIs) for safety, quality, health and environmental issues.
- Report all safety and quality incidents using the Life Healthcare incident reporting process.
- Follow all safety and quality instructions Work with and encourage patients, doctors, visitors, suppliers and contractors to conduct their business with us in a safe and environmentally responsible manner.
- Bring any undermining or unsafe practices to the attention of their supervisor, their local safety and quality committee, the SHEQ coordinator or the Helpline.

Supervisors must Always

- Effectively manage the risks arising from our activities, products and services through the application of Life Healthcare and industry best operating practices.
- Continually review operations and work processes to bring about continuous improvement in safety, quality and environmental standards.
- Continually seek to identify and review risks or hazards.
- Ensure functional competence of all employees through on-going training, development, communication and appraisal programmes.
- Be informed about any potential risks or hazards relating to the products and service we provide and ensure that all parties involved are informed and fully understand the risks or hazards.
- Ensure that measures are implemented and enforced to prevent exposure to any identified risks or hazards.

- Implement preventative/monitoring programmes in risk areas such as hygiene, infection control, biological monitoring and medical surveillance programmes.
- Establish and actively participate in the activities of safety, quality and environmental committees.
- Learn from incidents and share the lessons learned with employees, patients, doctors, visitors, contractors and other bodies as appropriate.

All employees have a part to play in ensuring a safe working environment, environmental protection, product stewardship, business improvement in line with SHEQ objectives and support for the local community where we operate. Overall we must conduct ourselves at all times as a responsible corporate citizen, pursuing sustainable development programmes and behaviours, and effective communication with all stakeholders.

Question: I'm worried about what appears to be an unsafe working practice that has been introduced to save costs. I know driving cost-efficiency is essential but this may be a step too far?

Answer: Every site has access to a SHEQ coordinator. It is the line manager's absolute responsibility to investigate concerns and complaints covering safety, health and the environment. It is also the responsibility of your manager to listen and respond to concerns made in good faith. It is essential that managers and SHEQ coordinator hear about concerns – so please speak out. In addition, you can always call the Helpline.

Safety, health and environment management checks and controls

Managers have special responsibilities. To ensure we meet our SHEQ goals, those who supervise others must make sure their employees and contractors have adequate training and that they understand that they have a duty to act in harmony with the tenets and spirit of this Code of Ethics.

Drugs and alcohol in the workplace

A safe work environment requires that we should be able to think clearly and react quickly. Being under the influence of alcohol or drugs, or improperly using medication, diminishes an employee's ability to perform at his or her best, and can threaten the safety of others. This is why Life Healthcare's rules strictly forbid abuse of drugs and alcohol.

Abusing medication, including consuming medication without paying due heed to the effects of that medication on your activities to the detriment of your job and safety of other people, is against Life Healthcare ethical standards. Employees are expected to exercise all due care and diligence when considering actions that might pose a risk to the safety of people.

If you observe that another employee's performance on the job is impaired due to the abuse of alcohol, drugs or other substances, or that another employee is abusing alcohol or illegal substances on Life Healthcare property, notify your supervisor, the human resources (HR) department or the Helpline.

Question: A close co-worker of mine recently seems to be acting strangely and wonder if

he may be abusing drugs. I don't want to get him in trouble, but I worry he is not being safe. What should I do?

Answer: A safe, secure work environment is absolutely critical to Life Healthcare. You think a problem may exist, so speak right away with your supervisor, a representative from HR or the Helpline, each of whom can review the situation. Your friend's best interests are safety too. Do not turn a blind-eye to something that may be illegal and may be jeopardising the safety of other people.

Data protection and employee confidentiality

Life Healthcare believes in respecting the confidentiality of our employees' personal information. This means that access to personal records should be limited to company personnel who have appropriate authorisation and a clear business need for that information.

Employees who have access to personal information must adhere to the highest standards of confidentiality regarding their use of personal information.

Never provide personal employee information requested by anyone outside Life Healthcare without proper authorisation.

Our commitment to employee confidentiality is not a licence to engage in inappropriate personal activities at work. Company computers, for example, are intended only for official use, not for personal or outside business activities. The company has the right to access and review all communications, records and information created at work or with company resources. This includes such things as intranet or internet activity, e-mail, voicemail and telephone conversations.

If you have questions about data protection and employee confidentiality, please contact Legal Services.

Question: What does our organisation do to keep personal company information about me confidential?

Answer: Our organisation restricts access to personal company information to those with a business and professional need for this information within the company, namely your supervisors and the HR department. Abuse of this access is against Life Healthcare's standards and can result in sanctions up to and including dismissal.

Offering and receiving gifts or entertainment

Business gifts and entertainment can build understanding and goodwill, but they can also make it harder to be objective about the person providing the gift or entertainment. In short, they can create their own 'conflicts of interest'. They can also erode the confidence and trust of others in your business decisions. That is why we have rules for receiving and giving gifts and entertainment.

In principle, there is nothing wrong with receiving or giving tokens of appreciation or accepting or giving reasonable entertainment to further a business relationship. We need to be sensitive to the different norms and conventions in the business communities and

cultures in which we operate so that we do not give offence. For this reason, 'nominal value' and 'reasonable entertainment' should be defined relative to cultural norms and conventions.

Using good judgement and moderation, occasionally exchanging entertainment or gifts of nominal value with a non-governmental individual or entity is appropriate unless the recipient's employer forbids the practice. (See Code of Ethics for Procurement ①).

Any courtesy should always comply with the policies of the recipient's organisation.

Potential risks:

- Doubts about the quality of business decisions.
- Undermining of confidence and trust in management.
- Allegations of misconduct.
- Appearing to be unfair to other stakeholders.
- **Gifts and entertainment to government officials raise special risks.**
- Never offer or provide gifts, gratuities or entertainment to government officials without prior written approval of Legal Services.

Usually acceptable:

Some gifts and entertainment are small enough that they do not require approval.

The following generally fall into this category:

- Occasional meals of reasonable expense with a business partner.
- Ordinary sports, theatre and other cultural events within the same town.
- Other gifts of nominal value or reasonable entertainment (defined locally).

Always wrong:

Other types of gifts and entertainment are simply wrong, either in fact or in appearance, so that they are never permissible. No one can approve these. An offer, gift, entertainment or anything of value may not be given if it is:

- Illegal or would result in a violation of law.
- Cash or a cash equivalent (such as gift certificates, loans, stock, or stock options).
- A 'quid pro quo' or part of an agreement requiring anything in return for the gift.
- Sexually oriented, or otherwise violates our commitment to mutual respect.
- In violation of our standards or the standards of the recipient's organisation not recorded properly on Life Healthcare's books.

For anything that does not fit into the other categories, it may or may not be permissible to proceed, but you need to get approval. These items fall into the category of 'always ask'.

Always ask:

- Gifts and entertainment of unusual or large expense.
- Any significant travel (including day trips away from the office and weekend travel).

In determining whether to approve something in the 'always ask' category, supervisors should use reasonable judgement and consider such questions as:

- Would the gift or entertainment be likely to influence the recipient's objectivity?
- Is there a business purpose? For example, will business be discussed as part of the event in question?
- What kind of precedent would it set for the future and other employees?
- How would it appear to other employees or people outside Life Healthcare?

Question: I deal with a large medical aid, which represents a large portion of my unit's business. I have built up a very good relationship with some of the medical aid employees and would like to take them out to lunch. May I do so?

Answer: Yes you may, but remember the following:

- Keep to company guidelines (value of gift parameters, nothing illegal, etc).
- Exercise the principles of moderation and proportion.
- Answer the key questions posed in the 'receiving gifts and entertainment' section above.
- Get approval from your supervisor for any gift or entertainment for which approval is required (the 'always ask' category) or about which you are uncertain.

Our responsibilities to communities and the public.

Our commitment

Life Healthcare is committed to being a positive contributor to the communities in which we do business. We oppose public corruption, act as responsible stewards of our products, services and the environment, play a part in supporting community activities in the places where our businesses operate, and support the fundamental principles of good governance and human rights.

In this regard, Life Healthcare participates in a number of programmes and initiatives in support of these principles. Examples of our organisation's 'good citizenship' and details of a range of community initiatives and our work on corporate social responsibility (CSR) are available for public view on the Life Healthcare web site.

Bribes and kickbacks

Corruption distorts markets and harms overall economic, social and political development, particularly in developing countries. Bribery is a form of corruption.

Bribery is the giving or receiving of any undue reward by or to any person to influence their behaviour in a manner contrary to the principles of honesty and integrity.

Life Healthcare's commitment to business integrity is clear and unequivocal:

- Life Healthcare employees should not bribe, nor should they accept bribes.
- Life Healthcare will investigate all suspicious circumstances relating to corruption and bribery.

Damage to reputation and penalties are serious. The damage to Life Healthcare's good name that could occur as a result of involvement in corruption or bribery activities is incalculable. In addition, infringements are likely to result in significant fines and other sanctions against our organisation and the individual employees involved, including, in some cases, criminal penalties and imprisonment.

Never:

- Offer or give, directly or indirectly, anything of value (such as money, goods or services) to a third party – including a government official – to obtain or retain business, or to secure any improper advantage.
- Offer or give a business courtesy – such as a gift, financial contribution or entertainment – under circumstances that might create the appearance of impropriety.
- Offer or contribute any Life Healthcare funds or other company assets for political purposes without the prior approval of the board.

Be careful:

- Exercise due care when selecting persons or firms to represent our businesses.
- Require that any arrangement with a person or firm acting on our behalf (such as an agent, consultant, sales representative, distributor or contractor) is governed by an appropriate written contract that sets out the scope of role and adherence to all relevant laws and Code of Ethics standards.
- Consult the organisation's control and finance policy to ensure that all books, records and accounts accurately and fairly reflect transactions and dispositions of assets.
- To avoid any concerns of impropriety, employees should take care when offering or receiving gifts and entertainment (see the employee section on gifts and entertainment).
- Giving or accepting courtesies that might prejudice your objectivity, lead to conflicts of interest or seem to give unfair favour or advantage, are at odds with our business standards. If in doubt, please discuss your concerns with your supervisor, or contact Legal Services or any of the resources listed in this Code of Ethics.

If you have any questions, discuss business relationships and transactions with your supervisor. Raise any concerns about possible impropriety.

Question: I was told that I could hire a consultant to assist us in recovering outstanding amounts for WCA cases treated by our hospital. He requested a very large retainer and said that he would use the money to "help move the process along." Since we don't really know where the money is going, do we have to worry about it?

Answer: Absolutely. You must know where that money is going and for what purpose it is being used. Moreover, the company is required to use due care in selecting consultants and agents and also take steps to ensure that this money is not used as a bribe. You must seek the advice of your manager or Legal Services.

The environment

Life Healthcare is committed to excellence in environmental management. The protection of the environment is one of our critical priority areas. Continuous improvement in this area is a fundamental element of the sustainable growth of our company, and it is pursued as an integral feature of all business processes and programmes.

Maintaining high levels of environmental performance and reporting are the responsibility of each employee. We each have a responsibility to keep a watch on Life Healthcare's impact or possible impact on the environment. Employees are the eyes and ears of the organisation and therefore play an essential part in our efforts to continuously improve environmental performance. All managers and SHEQ coordinators have the duty to assist with the implementation and management of the environmental programme.

How we manage environmental performance

In striving for sound environmental management we will:

- Comply in letter and spirit with all relevant legal requirements and industry performance standards, and co-operate fully with the authorities in the development

- of such laws, regulations and industry codes of practice;
- Maintain an environmentally sound workplace in all our locations by assessing and effectively managing the risks arising from our activities, products and services through the application of best operating practices;
 - Continually review our operations and processes and create appropriate programmes and support to bring about continuous improvement in performance;
 - Identify and minimise waste in the use of energy and all other resources;
 - Effectively manage the disposal of medical waste at all our units;
 - Place a duty of care on all managers and hold them accountable for environmental performance against agreed key performance indicators (KPIs);
 - Ensure functional competence of all our employees through on-going training, development, communication and appraisal programmes;
 - Work with and encourage our suppliers and contractors to conduct their business with us in an environmentally responsible manner;
 - Learn from incidents and share the lessons learned with employees, customers, contractors and other bodies as appropriate, and
 - Conduct ourselves at all times as a responsible corporate citizen, pursuing sustainable development programmes and behaviours, and effective communication with all stakeholders.

Company managers have special responsibilities. To ensure we meet our environmental goals, those who supervise others must make sure their employees have adequate training, and that they understand that they have a duty to act at all times in harmony with the tenets and spirit of these standards.

If you have questions or concerns relating to Life Healthcare's environmental compliance requirements or activities, contact the SHEQ department or consult the Life Healthcare SHEQ policy [①](#). See also the health, safety and security of employees section in this Code of Ethics.

Question: Our hospital makes use of a contractor to remove and dispose of hazardous medical waste. I have heard from a reliable third party that this contractor does not dispose of this waste in a proper manner and has even been known to dump waste at public dumping sites. Seeing as I do not have any proof of this, should I do anything about it?

Answer: The answer is yes. You should inform your supervisor or the SHEQ coordinator of the rumour so that they can ensure that your hospital's waste is disposed of in the correct and a responsible manner. Any incident in this regard could damage Life Healthcare's reputation as a responsible healthcare service provider.

Safety

Life Healthcare is committed to practising and communicating safe operations and business practices. It is important have clear and measurable performance standards to ensure that employees, customers, suppliers and local communities are well protected.

The Life Healthcare board has identified safety and quality in the workplace and in our daily lives as a priority. Every business unit, site location and individual employee has a responsibility to uphold the company's safety and quality standards. More information can

be accessed through your manager or local SHEQ coordinator.

For more information in this Code of Ethics, see the health, safety and security of employees section.

More information on safety and quality can be found in the 'Responsibilities to employees' section of this document.

Human rights

Life Healthcare believes that companies have a responsibility to contribute to the promotion and protection of international 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 contained in this document. Consistent with its view that respect for human rights is a moral and business imperative, our organisation will endeavour to support the rights of those impacted by its operations. To this end our organisation will:

- Support and respect for the protection of human rights within Life Healthcare's sphere of influence.
- Not be complicit in any human rights abuses.
- Support the promotion and protection of human rights.

Question: How can our company have a human rights policy? Surely this is a matter for government and the UN?

Answer: There are several ways we can underpin a human rights policy. The first is to show broad support for the principles of sustaining human dignity, diversity, equal opportunities, safety at work and a fair wage for a fair day's work. The second is through the process of 'living our values'. That is to say, supporting the principles of fairness and equality through our daily lives and work practices, and reporting concerns and deviations when we come across them.

Community engagement and involvement

Life Healthcare plays a varied, full and active role in the communities in which it operates.

Life Healthcare will:

- Continue to play an active role in its local communities.
- Continue to participate in charitable donations and social investment programmes appropriate to the size, means and capabilities of our businesses.
- Encourage business units to engage with their communities and support the appropriate initiatives and good causes in line with our designated priorities.

Details outlining Life Healthcare's involvement in the community and the work being undertaken to develop the company's corporate citizenship programmes, can be found in the social investment section of our web site.

Question: Can I use company time and resources to support my favourite charity? Are there any restrictions?

Answer: Our company is involved in many social initiatives. An example of this is our CIP-days, which are held through the country. For that reason, you should discuss community ideas and your proposed commitment with your supervisor or your CIP-committee.

Political activity

Contributions by corporations to political parties and candidates, is a very contentious issue and has resulted in corporations and business people finding themselves under scrutiny and involved in lengthy legal battles.

To avoid any such occurrences and to adhere to this Code of Ethics, employees may not make any direct or indirect political contribution on behalf of Life Healthcare unless authorised by the board. This includes contributions to candidates, office holders and political parties. Contributions can include such things as:

- Buying tickets for a political fundraising event.
- Providing goods or services.
- Loaning personnel during working hours for fundraising activities.
- Paying for advertisements and other campaign expenses.

Personal political activity. Life Healthcare encourages political activity by employees in support of candidates or parties. But you should engage in the political process in your own time, with your own resources. Wearing political attire during working hours will not be permitted. Never use company time, property or equipment for personal political activities.

Lobbying. Lobbying requires disclosure, may be subject to specific rules and covers many kinds of activity.

If you need further information on authorised political activities, please consult Legal Services.

Government inquiries or investigations

From time to time Life Healthcare personnel may come into contact with government officials responsible for enforcing the law. Dealing honestly with government officials is critical.

If circumstances arise involving contact with government officials with respect to your duties at Life Healthcare, any information provided must be honest at all times.

At the same time, care must be taken in dealing with any representatives of government agencies to ensure that all appropriate steps are taken and that our legitimate company interests are protected. Accordingly, you should always check with Legal Services and receive advice before responding to a request for information from a government agency other than a routine inquiry. Also, be sure that records relevant to the government inquiry are preserved.



Information Resource Table ⓘ.

The table below indicates additional resources that can be consulted:

Topic	Documentation
Competing fairly	The Competition Act of 1998
Monopolies and abuse of dominant position	The Competition Act of 1998
Insider trading	The Insider Trading Policy and the Policy dealing with Price Sensitive Information
Ethical procurement	Procurement Code of Ethics Executive Constraints
Complying with professional standards	Nursing Act of 1978 Pharmacy Act of 1974 Codes of Conduct and Regulations published by professional bodies
Acting as a director	The Companies Act of 2008
Conflict of interest	Procurement Code of Ethics
Accurate and complete books and records	Life Healthcare Finance Policy and Procedures Executive Constraints
Life Healthcare proprietary information	Human Resources Policies and Procedures Letters of Appointment
Company time	Human Resources Policies and Procedures Letters of Appointment
Computer and Network Security	Life Healthcare IM Policies and Procedures
Equal employment opportunity	Employment Equity Act Human Resources Policies and Procedures Industrial Relations Policies and Procedures
Harassment-free work environment	Employment Equity Act Human Resources Policies and Procedures Industrial Relations Policies and Procedures
Safety, health and security of employees	The Occupational Health and Safety Act of 1993 The National Environmental Management Act of 1993 Life Healthcare SHEQ policy
Drugs and alcohol in the work place	The Occupational Health and Safety Act of 1993 Human Resources Policies and Procedures Industrial Relations Policies and Procedures
Data protection and employee confidentiality	Human Resources Policies and Procedures Industrial Relations Policies and Procedures Life Healthcare IM Policies and Procedures

Topic	Documentation
Offering and receiving gifts	Procurement Code of Ethics
Bribes and kickbacks	Procurement Code of Conduct
The environment	The Occupational Health and Safety Act of 1993 The National Environmental Management Act of 1993 Life Healthcare SHEQ policy
Safety	The Occupational Health and Safety Act of 1993 Life Healthcare SHEQ policy

Persons to contact ⓘ.

The table below indicates additional resources that can be consulted:

Topic	Department	Contact Details
Reporting any concerns about ethical and legal standards	Whistle-blower (Tip-off line)	0800 005 072
Competing fairly	Legal Services	Mark Stafford (011) 219-9230
Guidelines for trade and professional associations	Legal Services LPMS (Pharmacy Operations) Nursing Department	Mark Stafford (011) 219-9230 Shirley Leadbeater (011) 219-9516 Fasie Smith (011) 219-9552 Joy Cleghorn (011) 219-9538 Lesley Fletcher 011-219-9556
Competitor joint ventures	Legal Services	Mark Stafford (011) 219-9230
Monopolies and abuse of dominant position	Legal Services	Mark Stafford (011) 219-9230
Insider trading	Legal Services	Mark Stafford (011) 219-9230
Intellectual property	Legal Services LPMS (Pharmacy Operations) Nursing Department	Mark Stafford (011) 219-9230 Shirley Leadbeater (011) 219-9516 Fasie Smith (011) 219-9552 Joy Cleghorn (011) 219-9538 Lesley Fletcher (011) 219-9556
Government as a customer	Legal Services	Mark Stafford (011) 219-9230
Ethical procurement	Procurement Department	Ilhaam Solomons (011) 219-9512
Complying with professional standards	Legal Services LPMS (Pharmacy Operations) Nursing Department	Mark Stafford (011) 219-9230 Shirley Leadbeater (011) 219-9516 Fasie Smith (011) 219-9552 Joy Cleghorn

Topic	Department	Contact Details
	Human Resources Department	(011) 219-9538 Lesley Fletcher 011-219-9556 Juliet Mhango (011) 219-9531
Acting as a Director	Legal Services	Mark Stafford (011) 219-9230
Conflict of interest	Legal Services LPMS (Pharmacy Operations) Nursing Department Human Resources Department	Mark Stafford (011) 219-9230 Shirley Leadbeater (011) 219-9516 Fasie Smith (011) 219-9552 Joy Cleghorn (011) 219-9538 Lesley Fletcher (011) 219-9556 Juliet Mhango (011) 219-9531
Accurate and complete books and records	Finance Department	Jackie Napier (011) 219-9300
Life Healthcare proprietary information	Legal Services LPMS (Pharmacy Operations) Nursing Department Human Resources Department	Mark Stafford (011) 219-9230 Shirley Leadbeater (011) 219-9516 Fasie Smith (011) 219-9552 Joy Cleghorn (011) 219-9538 Lesley Fletcher (011) 219-9556 Juliet Mhango (011) 219-9531
Company time	LPMS (Pharmacy Operations) Nursing Department Human Resources Department	Shirley Leadbeater (011) 219-9516 Fasie Smith (011) 219-9552 Joy Cleghorn (011) 219-9538 Lesley Fletcher 011-219-9556 Juliet Mhango (011) 219-9531
Investor relations	Investor Relations	Adam Pyle (011) 219-9115
The media	Communications Department	Tanya Bennetts (011) 219-9672
Computer and network security	Healthcare IM	Anton van Loggerenberg (011) 219-9128
Equal employment opportunity	Human Resources Department	Juliet Mhango (011) 219-9531
Harassment-free	Human Resources Department	Juliet Mhango

Topic	Department	Contact Details
work environment		(011) 219-9531
Safety, health and security of employees	SHEQ Department	Rachel Nduku (011) 219-9710
Drug and alcohol in the work place	Human Resources Department	Juliet Mhango (011) 219-9531
Data protection and employee confidentiality	Healthcare IM Human Resources Department Privacy Officer	Anton van Loggerenberg (011) 219-9128 Juliet Mhango (011) 219-9531 Michael Dorfan (011) 219 -9232
Offering and receiving gifts	Procurement Department Human Resources Department	Janette Joubert (011) 219-9536 Juliet Mhango (011) 219-9531
Bribes and kickbacks	Procurement Department Human Resources Department	Janette Joubert (011) 219-9536 Juliet Mhango (011) 219-9531
The environment	SHEQ Department	Rachel Nduku (011) 219-9710
Safety	SHEQ Department	Rachel Nduku (011) 219-9710
Community engagement	Marketing and Communications	Yvonne Motsisi (011) 219-9385