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	Speak-Up and Reporting Policy	

I. PURPOSE

Sonic Healthcare USA, and its Clinical Laboratories and Anatomic Pathology Practices (individually and collectively referred to herein as, “Sonic Healthcare USA” or “Company”) is committed to fostering a culture of integrity, accountability, service, and continuous improvement, in alignment with our core values. This Speak-Up and Reporting Policy establishes the Company’s expectation that all Sonic Healthcare USA employees, regardless of position, share in the responsibility of safeguarding Sonic Healthcare USA’s ethical standards and compliance obligations.

II. SCOPE

All Sonic Healthcare USA employees are required to promptly report any knowledge or Reasonable Belief, as herein defined, of misconduct, concerns, or illegal activity related to the Company or any of its employees. This includes, but is not limited to, activities that may violate the Compliance Program Manual, the Code of Conduct, applicable laws, rules, regulations, standards of medical practice, payer program and billing requirements, or any other Company policies or procedures.

III. DEFINITIONS

- A. **Allegation:** An assertion made by a party that must be proved or supported with evidence.
- B. **Compliance Line:** The Company-designated reporting channel, available by phone (Hotline) or online, for employees and others to raise concerns or report misconduct.
- C. **Confidential:** Information shared is protected and only disclosed to those who need to know to investigate or resolve the concern, consistent with privacy and legal requirements.
- D. **Good-Faith:** Reporting a concern with honest intent, based on what the reporter believes to be true, even if the concern is later found to be unsubstantiated.
- E. **Incident Management System:** The Compliance Line is a secure tool managed by a third-party service provider and used by the Company to record, track, manage, and resolve reports or concerns.
- F. **Non-Retaliation:** A commitment that no employee will face punishment, demotion, harassment, or other adverse treatment for raising concern in Good Faith.
- G. **Reasonable Belief:** When a person, given the facts and circumstances available, has a rational basis to think misconduct has occurred or may occur.
- H. **Reportable Concern:** Any issue, activity, or behavior that may violate Company policy, applicable health care laws, regulations, patient safety standards, or ethical Company expectations.

IV. POLICY

The Company strives to ensure that every employee feels safe and supported in raising concerns about potential misconduct or non-compliance. Sonic Healthcare USA is committed to ensuring that anyone with a Good-Faith Reportable Concern has sufficient channels through which to speak up in a secure and Confidential manner, including providing the ability to remain anonymous, if the reporter desires. To encourage reporting of Reasonable Belief of misconduct, violations, or illegal activity, the following mechanisms and safeguards are established by this policy:

- A. **Non-Retaliation:** The Company strictly prohibits any form of retaliation or negative consequences against employees who raise Good-Faith concerns, report suspected misconduct or participate in an investigation related to this policy. Employees are encouraged to report in Good-Faith any concerns or questions without fear of retaliation, even if it is determined, after reasonable investigation, that there was no violation.

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- B. **Open-Door Culture:** A workplace environment culture and practice where leaders, managers, and supervisors actively encourage Company employees to bring forward questions, concerns, ideas, or feedback without barriers for fear of reprisal. Employees are encouraged to raise any concerns, comments, or questions with their department, direct supervisors, managers, Divisional Compliance Leaders, the Central Compliance Team, or Human Resource personnel.
- C. **Sonic Compliance Line:** The Company maintains a dedicated Confidential reporting channel for employees, vendors, referring providers, and patients to report, in Good-Faith, any known or suspected violations, concerns, or ask questions. Included as a part of the Compliance Line is the Company's Incident Management System for conducting secure and Confidential investigations related to employee Allegations or compliance concerns. The Compliance Line and Incident Management System are managed by third-party service providers to protect the anonymity of reporters and track investigations from inception to closure.
- D. **Self-Reporting Obligation:** Employees must maintain the highest standards of integrity, accountability, and compliance in their performance duties. If any employee becomes aware of their own potential misconduct or a violation of any of the Company's policies, federal laws, or state laws, they must promptly self-report the issue to their direct supervisor, manager, Divisional Compliance Leader, the Central Compliance Team, or Human Resources personnel.

Employees failing to report any Reportable Concern may be subject to disciplinary action (see, **Section XII** of this policy).

V. IMPORTANCE OF REPORTING

Reporting compliance-related concerns is a critical part of maintaining the safety, ethics, compliance, integrity, and credibility of our healthcare environment. All Sonic Healthcare USA employees have a duty to speak up and report any incidents of suspected non-compliance, violation of policy or law, or unsafe practice. You are encouraged to use any of the available reporting channels and mechanisms made available by Sonic Healthcare USA.

A. Reporting Responsibility

Employees have a responsibility to promptly report or seek clarification regarding any conduct that may violate policies, laws, or ethical guidelines. This proactive approach allows Sonic Healthcare USA to address issues before they escalate into legal violations, pose risks to health and safety or cause reputational harm to the Company.

Sonic Healthcare USA encourages all employees to ask questions and raise any concerns they may have. It is the Company's duty to process and respond appropriately to all inquiries. These inquiries may cover various topics, including compliance-related issues, employee relations, and quality or safety concerns.

Employees may raise Reportable Concerns or general compliance-related questions to the Compliance or Human Resources Departments through the Compliance Line or other available channels. The Compliance and Human Resources Departments will document and manage the receipt and resolution of all inquiries through the Incident Management System.

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Examples of information that should be reported include but are not limited to:

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| Billing, Coding, and Payor Concerns | 12. Gifts and Entertainment |
| Bribery or Corruption | 13. Health Insurance Portability and Accountability Act
HIPAA/ Protected Health Information (PHI) |
| Business Ethics | 14. Human Rights Violations |
| Compliance Questions or Suggestions | 15. Misconduct or Inappropriate Behavior |
| Conflicts of Interest | 16. Patient Safety Concerns |
| Disclosures of Confidential Information | 17. Physician Payment and Referral Concerns |
| Discrimination or Harassment | 18. Policy Clarifications |
| Diversity, Equal Opportunity and Respect in the Workplace | 19. Quality/ Regulatory |
| Employee Relations & Unfair Employee Practices | 20. Retaliation |
| Financial Concerns | 21. Safety, Health, and the Environment violations |
| Fraud/ Waste/ Abuse | 22. Theft/ Violence/ Threats |
| | 23. Unfair Employment Practices |

This policy should not be used by employees to report any situations that present an immediate threat to life or property. If you require emergency assistance, please contact your local authorities or call 911.

Additionally, this policy should not be used to settle personal or legal disputes that are unrelated to Company business, nor used to make reports or allegations you know to be false. Engaging in such actions will result in disciplinary measures (see, Section XII of this policy).

VI. REPORTING PROCEDURES

There are several ways to speak up and report a concern including, but not limited:

1. **Directly** contact your manager or supervisor, your Division Compliance Leader, Human Resources, or the Central Compliance Team to raise and discuss your concern through the Open-Door Policy.

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2. Use the Compliance Line:

The Compliance Line can be accessed 24 hours a day, 7 days a week, and 365 days per year. The Compliance Line can be accessed in various ways to report suspected incidents of non-compliance (as listed in **Section IV.B** of this policy):

- a. Hotline (toll-free) number: 1-800-205-9649,
- b. Online website: soniccompliance.ethicspoint.com,
- c. Mobile site: soniccompliancemobile.ethicspoint.com,
- d. QR code: Can be found on Sonic Compliance Line posters.



All managers and supervisors who receive a report of non-compliance (**as listed in Section V.A of this policy**) must submit a report immediately to the Incident Management System (i.e. Compliance Line).

All reports received should be documented and managed through the Incident Management System. When speaking up, reporting, or sharing information about suspected misconduct, please provide all facts pertaining to the case with as much detail as possible. Names, dates, locations, and details will be critical in conducting an independent, objective, and timely investigation and review. Reports can be made anonymously.

A. Follow-Up and Tracking Updates

When reporting online via the Incident Management System, reporters are prompted to create a password. After submission, you will receive a system-generated report key. Keep the password and key in a secure place to log back into the Incident Management System and check the status of your report. You will also be able to communicate with your investigator, even if you are an anonymous reporter.

VII. INVESTIGATIONS

Sonic Healthcare USA is committed to conducting timely, fair, and thorough investigations into all concerns raised under this policy. Investigations are conducted to ensure compliance with laws, regulations, company policies, and to uphold a culture of integrity and accountability.

A. Investigation Process

Investigations will begin promptly upon receipt of the report. The Company will make reasonable efforts to complete investigations in a timely manner, recognizing that the timeframe may vary depending on the complexity of the issue(s). All reports will be promptly reviewed and assessed by the Compliance department. External investigators may be engaged when specialized expertise, independence, and/or legal requirement(s) are necessary. All parties will be treated fairly and with respect throughout the investigation. Individuals named in a report will be provided with an opportunity to respond to the Allegations or issues raised.

As previously stated, all reporters utilizing the Incident Management System to report a compliance concern can track updates, communicate with the investigator, and review final decisions using the system-generated report key and reporter-created password. If you submit multiple reports, every report will have its own individualized key. Reporters will receive periodic updates throughout the course of the investigation

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and will be informed once the investigation is concluded. Please note that not all proceedings, decisions, and consequences may be disclosed, to protect Confidentiality, privacy, and the legal rights of all parties involved. If it is determined that corrective action is necessary, the matter will be referred to the appropriate manager for follow-up and the respective department will provide necessary oversight to ensure completion.

B. Confidentiality, Anonymity, & Impartiality

Sonic Healthcare USA respects and honors the Confidentiality, desires for anonymity, and privacy rights of all employees, patients, and stakeholders. Therefore, personal information collected while reporting or investigating a concern will be managed in compliance with applicable privacy laws. Employees utilizing the Compliance Line to submit a Reportable Concern in Good-Faith will remain Confidential and protected against any form of retaliation. Individuals contacting the Hotline can remain anonymous by informing the Incident Management System during their call or by checking the box in the online or mobile report. The Company will make every effort to protect the anonymity of Good-Faith reporters. Information may need to be disclosed on a limited basis to properly investigate and address reported concerns, consistent with applicable laws and policies. The Company will take all reasonable steps to minimize the sharing of sensitive information and to safeguard the privacy of all individuals involved.

If you prefer to remain anonymous, there may be instances where additional information or clarification is needed to fully investigate your concern. The Compliance Line allows anonymous reporters to communicate directly with investigators while preserving your anonymity and Confidentiality. Only investigators directly involved in the case will be informed of the specifics on a need-to-know basis.

To ensure impartiality and maintain the integrity of the compliance process, any employee who is subject of a report, including managers, members on the compliance team, or executives and directors, are excluded from any involvement in the investigation, review, and determinations related to that report. All investigations will be conducted by personnel independent of the reported individual. Confidentiality will be maintained, and all information will be handled securely and shared only on a need-to-know basis to avoid conflicts of interest and ensure a fair, impartial review.

C. Non-Retaliation

Retaliation is itself a violation of Company policy and may result in disciplinary action. Any form of retaliation against an employee who raises a compliance concern, in Good-Faith, or participates in a compliance investigation will NOT be tolerated. If you suspect you or someone else is experiencing retaliation, as a result of speaking up, you need to report the act to your supervisors or division Compliance Leaders, using the Compliance Line, or any other method states in **Section VI** of this policy.

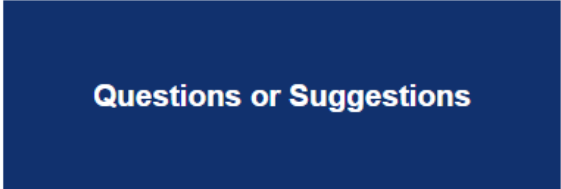
D. Employee Obligation

All employees are expected to report concerns in Good-Faith; they are not required to investigate or determine whether a violation has occurred. Sonic Healthcare USA will handle all fact-finding and take necessary corrective actions. The responsibility to investigate and resolve such matters rests solely with the Company.

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VIII. QUESTIONS


If you have any questions about this policy, please contact your division compliance leader or submit a “Question/ Policy Clarification” ticket through the Compliance Line. If you are unsure whether an activity is contrary to this policy, seek guidance from your supervisor, division compliance leader, or you can submit a “Question/ Policy Clarification” inquiry through the Compliance Line.



Policy Clarification	Details
Questions	Details
Suggestions	Details

IX. DOCUMENTATION & RETENTION

All materials generated in connection with the investigation of a reported concern (e.g., initial reports, interview notes, findings, supporting documentation, etc.) must be documented and retained in accordance with the Division’s Document Retention Policy.

 These materials shall be submitted to the Compliance Line and made available to the Central Compliance Team upon request.

X. POLICY REVIEW

This policy will be reviewed biennially by the Compliance Department, or more frequently as required due to changes in applicable laws, regulations, or internal business practices. Revisions will be documented and communicated to all relevant personnel.

XI. POLICY EXCEPTION

Any exceptions to this policy must be reviewed and approved in advance by the Chief Compliance Officer. Requests for exceptions must be submitted in writing and include clear rationale.

XII. ENFORCEMENT

All employees are required to understand and comply with this policy. Failure by an employee to comply with this policy, including those conducting investigations, will be subject to disciplinary action, up to and including termination of employment. The Company reserves the right to investigate any suspected violations and to take appropriate corrective action.



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Effective Date: 10/29/2025		Initial Effective Date: 07/26/2021	
APPROVALS			
	Name	Signature	Date
Author:	Compliance Team	Dana Simonds <small>Digitally signed by Dana Simonds Date: 2022.07.26 17:34:08 -05'00'</small>	7/26/22
CCO:	Dana Simonds	Dana Simonds <small>Digitally signed by Dana Simonds Date: 2022.07.26 17:34:18 -05'00'</small>	7/26/22
CGC:	Kenneth A. Johnson	Kenneth Johnson <small>Digitally signed by Kenneth Johnson Date: 2022.08.09 14:07:28 -05'00'</small>	8/9/22

REVISION HISTORY			
Version #	Date	Reason for Revision	Effective Date
001	07/26/2021	Initial Draft	07/26/2021
002	07/26/2022	Revised policy and changed format, enhanced QR code for Compliance Line	07/26/2022
003	9/22/2025	Revised and updated Policy, Changed format	10/29/2025

PERIODIC REVIEW & APPROVAL		
Name	Signature	Date
David Rose	<i>David Rose</i> <small>E597BE5130D2533C6A3B76F9C3F20D82 contract works</small>	10/29/2025