

PRIMARY HEALTH CARE LIMITED
(ACN 064 530 516)

DIVERSITY POLICY

PRIMARY HEALTH CARE LIMITED

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Approved by the Board of Primary Health Care Limited on 5 August 2011

DIVERSITY POLICY

1. DEFINITIONS AND INTERPRETATION

1.1 Definitions

In this Policy, unless the contrary intention appears:

“**at any time**” means at any time and from time to time;

“**the Board**” means the board of directors of the Company;

“**the CGPR**” means Corporate Governance Principles and Recommendations of the ASX Corporate Governance Council;

“**the Committee**” means the Nomination and Remuneration Committee established by resolution of the Board;

“**Primary**” means Primary Health Care Limited (ACN 064 530 516);

“**the Primary Group**” means Primary and any entity controlled by Primary (as defined in Accounting Standard “AASB 127: Consolidated Accounts”);

“**Director**” means a member of the Board.

1.2 Interpretation

In this Policy:

- (a) italicised notes are not part of this Policy and this Policy may be published at any time with or without any one or more of those notes, and either uniformly or on a selective basis;
- (b) any reference to ASX Ltd Listing Rules (“**LR**”), clauses of Primary’s Constitution (“**cl.**”), or the CGPR are construed as references to those for the time being in force, and references to specific provisions of those documents are construed as references to those provisions as amended or replaced from time to time.

2. POLICY

2.1 This document sets out Primary’s policy in relation to diversity within Primary.

2.2 This Policy:

- (a) adopts the CGPR, which require the Boards of ASX listed entities to approve, monitor and report on diversity at all levels, including Board level and particularly in relation to gender diversity;
- (b) applies to all Directors, employees and contractors of the Primary Group.

3. BACKGROUND

- 3.1 With effect from 1 July 2014, the ASX Corporate Governance Council updated the CGPR (to the 3rd Edition), including in relation to issues concerning diversity, particularly, gender diversity. These recommendations include a requirement that companies:
- (a) establish a policy concerning diversity and disclose the policy or a summary of that policy including requirements for the Board to establish measurable objectives for achieving gender diversity and for the Board to assess annually, both the objectives and progress in achieving them [CGPR 1.5(a)];
 - (b) disclose the above policy or a summary of it [CGPR 1.5(b)]; and
 - (c) disclose, at the end of each reporting period, the measurable objectives for achieving gender diversity set by the Board or a relevant committee of the Board in accordance with the company's diversity policy and its progress towards achieving them, and either:
 - (1) the respective proportions of men and women on the Board, in senior executive positions and across the whole organisation (including how the entity has defined "senior executive" for these purposes); or
 - (2) if the company is a "relevant employer" under the Workplace Gender Equality Act, the entity's most recent "Gender Equality Indicators", as defined in and published under that Act [CGPR 1.5(c)].

4. POLICY STATEMENT

- 4.1 Diversity within Primary includes gender, ethnicity, religion, culture, language, sexual orientation, disability and age.
- 4.2 Primary recognises the importance of a diverse and inclusive workplace in which all individuals, with a broad range of backgrounds, skills, experience and perspectives can contribute to the success of Primary's operations.
- 4.3 Each year, Primary participates in the Workplace Gender Equality Agency (WGEA) public reporting program. Those reports indicate that Primary comprises a diverse range of employees and contractors and is represented by a high number of women across the medical centres, pathology and diagnostic imaging business divisions.

5. POLICY

5.1 Disclosure

Primary will disclose, through one or more channels readily accessible to the public (for example: Annual Report; Corporate Governance Statement; Environmental, Social and Governance Statement):

- (a) its measurable objectives for achieving gender diversity set by the Board for the forthcoming year;
- (b) its progress towards achieving those objectives for the preceding year;
- (c) the proportion of women employees throughout Primary, including senior executive positions and women on the Board; and
- (d) relevant strategies for specifically achieving measurable objectives under this policy.

5.2 Board Renewal

When identifying candidates for vacancies on Primary's Board of Directors, the Committee will ensure that:

- (a) all internal and external assessment of potential candidates will include a search for suitably qualified and experienced women;
- (b) at least one woman forms part of the interview and selection panel for Board appointments to promote equality and gender diversity;
- (c) succession planning includes the identification of women candidates with suitable skills and experience.

5.3 Recruitment and Selection

When developing and implementing recruitment and selection processes for employees and contractors, Primary will ensure that all candidates are considered and selected on the basis of individual skills, experience and merit and in line with all equal opportunity and anti-discrimination legislation.

5.4 Code of Conduct

Primary has a Code of Conduct which promotes respect for others, integrity and fairness in the workplace. All directors, employees and contractors must adhere to those principles within the framework of this policy.

5.5 Indigenous Employment

Primary promotes an inclusive and diverse workforce, including acknowledgement of the diverse knowledge, skills, traditions and cultures of Indigenous Australians.

Primary will develop and implement strategies which:

- (a) promote employment opportunities to Indigenous Australians;
- (b) establish links with Indigenous employment service providers;
- (c) review recruitment processes to ensure that they are culturally appropriate; and
- (d) increase cross-cultural awareness in the workplace.

6. RESPONSIBILITY

6.1 All Directors, employees and contractors are responsible for behaving in a manner which is consistent with this Policy.

6.2 The Committee

The Board has established the Committee, which is responsible for making recommendations to the Board in relation to:

- (a) initiatives to support and encourage diversity throughout Primary;
- (b) objectives for addressing gender diversity, particularly at Board level, including selection, performance evaluation and succession planning processes; and
- (c) an annual assessment of the effectiveness of measurable objectives.

6.3 Board of Directors

Primary's Board of Directors is responsible for:

- (a) establishing and monitoring Primary's overall diversity strategy and policy;
- (b) setting and reviewing measurable objectives for specifically addressing gender diversity following recommendations by the Committee.

6.4 Group Executive People & Legal

The Group Executive People & Legal is responsible for:

- (a) developing, reviewing and maintaining human resource policies and procedures in accordance with this policy and, where relevant, in line with measurable objectives for achieving gender diversity; and
- (b) preparing and reporting to the WGEA and public reporting program and providing those findings to the Board for its consideration.

Policy History

5 August 2011	Policy approved by the Board
15 August 2015	Policy updated
30 April 2018	Policy updated