

Human Rights Policy

1. HUMAN RIGHTS AT MEDIBANK

1.1. Policy Statement

At Medibank, we believe in Better Health for Better Lives. For 45 years, we've been supporting millions of people in Australia as one of the leading private health insurers. As a health company we also provide people with greater support to manage their health and wellbeing. We're doing this by offering more choice to customers about where they can receive their care, more control over what they pay for it and innovating to provide greater access to preventative healthcare.

We're partnering with leaders in the health sector – doctors, hospitals and research institutes – building new care options that deliver quality care, and we're helping to reform Australia's healthcare system so it can continue supporting all Australians. We also offer other insurance, including travel, pet and life, to make things easier for our customers – because everyone deserves to live their best quality of life.

Medibank's Human Rights Policy (**this Policy**) demonstrates our commitment to respecting **human rights** and ensuring respect and equality for our customers, employees, communities and suppliers. It sets out the commitments and guiding principles we apply to managing human rights issues across our business. Prior to the introduction of this Policy, Medibank managed and upheld human rights across our business through our existing policies and commitments. The establishment of this Policy strengthens that commitment.

In keeping with our longstanding commitment to sustainability and responsible practices, we respect and support the principles of human rights across the globe, including those set out in:

- [UN's Universal Declaration of Human Rights](#)
- [International Bill of Human Rights](#)
- [Eight fundamental Conventions of the International Labour Organisation](#)
- [UN Guiding Principles on Business and Human Rights](#)
- [Women's Empowerment Principles](#)
- [UN Declaration of the Rights of Indigenous Peoples](#)

Medibank's Executive Leadership Team, Business units and Medibank functions are responsible for the management of human rights within each business area. This includes ensuring compliance with this Policy.

1.2. Who This Policy Applies To

This Policy applies to Medibank and its controlled subsidiaries (Group) and its Directors, officers, employees and contractors, including suppliers of goods and services.

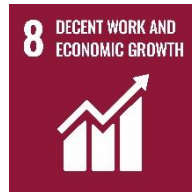
We expect all Medibank people, contractors, suppliers and anyone working on behalf of Medibank to:

- Consider the human rights implications of your actions and decisions.
- If you are procuring goods or services, adhere to our [Code of Conduct](#), and our [Supplier Code of Conduct](#), which also outlines our expectations in the areas of human rights, including labour rights.
- Report any human rights concerns and complaints to your People Leader, People, Culture & Sustainability Business Partner or use the [Whistleblowing Service](#).
- If you are a supplier to Medibank, uphold our commitment to human rights and comply with this Policy as well as the Supplier Code of Conduct.

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1.3. United Nations Sustainable Development Goals (SDGs)

This Policy supports our efforts to support the [United Nation's Sustainable Development Goals](#) and address our identified SDGs (SDG 3 Good Health and Wellbeing, SDG 5 Gender Equality, SDG 8 Decent Work and Economic Growth, SDG 10 Reduced Inequalities, SDG 13 Climate Action, SDG 17 Partnership for the Goals), in particular this Policy relates to:



2. OUR COMMITMENTS

2.1. Our Human Rights Commitments

Our commitments to our People, Customers and Community

1. Provide a [safe and healthy](#) environment for our customers, our people, contractors and visitors.
2. Maintain a fair, healthy and safe workplace for our people that is free from discrimination, bullying, harassment - including sexual harassment, victimisation, vilification or any other unacceptable forms of behaviour.
3. Respect the right of our people to establish or join trade unions or other associations, and their right to collective bargaining.
4. At a minimum, pay our employees a living wage (the minimum income required to meet basic needs) and invest in the prosperity of our people and their families.
5. Ensure a culture that fosters [diversity and inclusion](#); where everyone is treated fairly, with respect and dignity. We support and promote diversity and inclusion throughout our value chain including our people, partners, suppliers and customers.
6. Respect the rights of Aboriginal and/or Torres Strait Islander peoples and communities, in our efforts to advance [reconciliation](#) and support the creation of better health outcomes for First Nations peoples.
7. Work to reduce inequalities including gender inequalities and the rights and needs of marginalised groups and continually strive to improve accessibility and inclusion for our customers, our people, our providers and the community.
8. Respect our [customers' privacy and confidentiality](#) and protect their personal and sensitive information.

Our commitments to our Business Partners

9. Not tolerate or support the use of modern slavery, including child labour, forced, bonded or compulsory labour and human trafficking in our operations or within our supplier and business partner relationships (including the Worst Forms of Child Labour, as defined in the International Labour Organisation's Worst Forms of Child Labour Convention).
10. Manage social, environmental and human rights-related impacts with our suppliers, including providing support to help suppliers improve their performance.
11. Undertake a risk assessment of direct and indirect human rights issues in our operations and proactively work with our stakeholders to identify and mitigate any human rights related risks and impacts.
12. Incorporate human rights requirements into Medibank's supplier requirements and procurement processes.
13. Provide our stakeholders with appropriate channels to raise grievances related to human rights impacts.

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14. Engage with suppliers and other stakeholders to promote and respect human rights including collaborating and supporting suppliers to improve practices.

Our commitment to transparent and ethical behaviour

15. Avoid bribery and corruption in all its forms, as articulated in our [Anti-Bribery and Corruption Policy](#).
16. Work collaboratively with regulators and all levels of government to comply with applicable laws and regulations that support human rights and labour standards where we operate.
17. Provide transparent reporting on human rights related risks and impacts, management approach and performance in our Annual and Sustainability Reports ([found on our website](#)) and annual Modern Slavery Statement ([found on our website](#)).

3. POLICY BREACHES

3.1. Policy Breaches

Breaches of this Policy may result in disciplinary action, up to and including termination of employment and the police may be notified if a law is broken.

Breaches of this Policy by suppliers and vendors to Medibank may result in remedial action, including termination of business relationships and relevant authorities notified depending on the nature of the breach.

3.2. Reporting Breaches of This Policy

If you believe this Policy may have been breached, you can speak to your People Leader in the first instance. They will work with you to address the concern you've raised and seek necessary advice from a senior leader or a PC&S Business Partner if required.

If there's a reason you are not able to raise your concern directly with your People Leader, you can speak with your Senior Leader (this is usually the person your People Leader reports to), contact your PC&S Business Partner directly for advice about next steps or write directly to the CEO.

Alternatively (or if you are not a Medibank employee), you may choose to use Medibank's [Whistleblower Policy](#) and Procedure (Medibank Alert) which allows you to report conduct anonymously, or limit who is informed of your identity. Contact Medibank Alert on 1800 453 411 or email medibankalert@deloitte.com.au.

4. REVIEW AND PUBLICATION OF THIS POLICY

This Policy has been approved by Medibank's Board of Directors.

This Policy will be reviewed by the Medibank Board from time to time to ensure that it is operating effectively and whether changes are required. This Policy may only be approved or amended by resolution of the Board, with the exception of the Company Secretary who is authorised to amend this Policy to accommodate administrative or consequential amendments that are of no material significance.

This Policy will be made available via Medibank's website.