

# Human Rights Policy

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## 1. HUMAN RIGHTS AT MEDIBANK

### 1.1. Policy Statement

At Medibank, we believe in Better Health for Better Lives. For almost 50 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**) records our commitment to respecting and advancing **human rights** in our community, including for our customers, employees and suppliers. Human rights are rights inherent to all human beings, whatever their background, culture, gender, age or belief.<sup>1</sup> This Policy sets out and strengthens the commitments and guiding principles we apply to managing human rights issues across our business.

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

- The [United Nations \(UN\) Universal Declaration of Human Rights](#)
- [International Covenant on Economic, Social and Cultural Rights](#)
- [International Covenant on Civil and Political Rights](#)
- [Eleven fundamental instruments of the International Labour Organization](#)
- [UN Guiding Principles on Business and Human Rights](#)
- [Women's Empowerment Principles](#)
- [UN Declaration of the Rights of Indigenous Peoples](#)

Medibank's Group Squad, 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 wholly owned subsidiaries (**Group**) and its Directors, officers, employees (**our people**) and contractors, suppliers of goods and services, agents and partners.

We expect our 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 on behalf of Medibank, adhere to the expectations set out in our [Code of Conduct](#), and our [External Partners' and Suppliers' Code of Conduct](#), which also outline our expectations in the areas of equal opportunity and human rights, including labour rights.
- Report any human rights concerns and complaints to your People Leader; People, Spaces & Sustainability (**PS&S**) Business Partner; or use Medibank's [Whistleblower Policy](#) and Procedure (Medibank Alert).
- If you are an external partner of or supplier to Medibank, uphold our commitment to respecting human rights and comply with this Policy as well as the External Partners' and Suppliers' Code of Conduct.

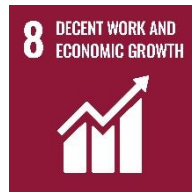
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<sup>1</sup> [Victorian Equal Opportunity and Human Rights Commission.](#)

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## 1.3. United Nations Sustainable Development Goals (SDGs)

This Policy assists our efforts to support the [UN SDGs](#), specifically our identified SDGs of 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 and 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 at or above relevant industrial instruments, promote a living wage (the minimum income required to meet basic needs), and invest in the prosperity of our people and their families.
5. Support and promote a culture that fosters [diversity and inclusion](#), where everyone is treated fairly, with respect and dignity, in our business and throughout our value chain (including for our people, contractors, suppliers and customers).
6. Respect the rights of Aboriginal and/or Torres Strait Islander peoples and communities, and continue our efforts to advance [reconciliation](#) and support the creation of better health outcomes for First Nations peoples.
7. Promote and continually strive to improve equal access and opportunity for marginalised groups within our business, including by taking active steps to promote and improve gender equality, foster a safe and inclusive environment for the LGBTQIA+ community, support effective disability inclusion and promote cultural diversity.
8. Collect feedback from our people to improve the employee experience through regular surveys.
9. Respect our [customers' privacy and confidentiality](#) and protect their personal and sensitive information.

#### Our commitments to our Business Partners:

10. 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 external partner relationships (including the Worst Forms of Child Labour, as defined in the International Labour Organisation's Worst Forms of Child Labour Convention).
11. Manage social, environmental and human rights-related impacts with our suppliers, including providing support to help suppliers improve their performance.
12. 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.
13. Incorporate human rights requirements into Medibank's supplier requirements and procurement processes through our [Supplier Guide: Human rights and modern slavery](#).
14. Provide our stakeholders with appropriate channels to raise grievances related to human rights impacts (including MedibankAlert).

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15. 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

16. Avoid bribery and corruption in all its forms, as articulated in our [Anti-Bribery and Corruption Policy](#).
17. 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.
18. 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. The police may be notified if a law is broken.

Breaches of this Policy by external partners and suppliers to Medibank may result in remedial action, including termination of business relationships and relevant authorities being 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 advice from a senior leader or a PS&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 PS&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](mailto:medibankalert@deloitte.com.au).

## 4. REVIEW AND PUBLICATION OF THIS POLICY

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

The Board will review this Policy 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.

Version	Effective Date
1	29 March 2022
2	15 May 2024