

Dated 22 September 2020

Diversity and Inclusion Policy

Virtus Health Limited (ABN 80 129 643 492) ("Virtus")

Adopted by the Board on 22 September 2020

Diversity and Inclusion Policy

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Diversity and Inclusion Policy

1 Diversity and inclusion at Virtus

1.1 Our commitment

This policy supports Virtus' commitment to an inclusive workplace that embraces and values diversity and provides a framework to achieve Virtus' diversity related initiatives, objectives, strategies and programs.

We are committed to the principles of Equal Employment Opportunity (EEO) in all aspects of people management practices, policies and procedures. We are dedicated to creating and ensuring a diverse work environment in which everyone is treated fairly and with respect and where everyone feels responsible for the reputation and performance of Virtus. The Virtus Board of Directors ("**Board**") and management believe that Virtus' commitment to this policy contributes to achieving Virtus' corporate objectives and embeds the importance and value of diversity within the culture of Virtus.

We acknowledge that our employees and clients share a diverse range of backgrounds and beliefs and practices and we support inclusion of differences in the workplace.

We aim to provide opportunities that allow individuals to reach their full potential and understand that we all bring different skills and perspectives to the workplace.

We aim to develop and promote a workforce based on inclusion where individuals are respected, supported and provided with appropriate opportunities.

We believe fostering a culture which allows people to perform at their best optimises results for everyone.

1.2 Who this policy applies to

This policy applies to all directors of the Board, as well as all other officers, employees, contractors, consultants and associates of Virtus. The policy is available on Virtus' website and intranet, and is supplied to employees when they are inducted to the company.

1.3 Implementation

The Board has the role of overseeing the implementation of this policy and assessing progress in achieving its objectives. See paragraph 3.2 below.

2 What diversity means to us

2.1 What is diversity?

Diversity refers to characteristics that make individuals different from each other. Virtus embraces a wide definition of diversity encompassing differences in backgrounds and experiences, and also differences in approach and viewpoints. It includes factors such as gender, gender identity, race, age, ethnicity, cultural background, sexual orientation, religion and belief, national cultures, socio economic background, language, disability, marital and partnership status and other areas of potential difference.

2.2 Diversity of all individuals

Virtus is committed to non-discriminatory behaviour in regard to all individuals. Our diversity program operates under the fundamental principle that a person's background, beliefs and practices are not a barrier to participation in our workforce, management, senior executive and on our Board.

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Our leaders are committed to providing opportunities that allow all staff to reach their full potential, regardless of their individual background, beliefs or practices.

2.3 Board and senior executive diversity

At Virtus, diversity of gender and background are two important criteria we take into account in developing our succession plans and appointment processes for our Board and senior executive positions. However, other selection criteria, in particular business acumen and industry experience, are also fundamentally important. The Board will determine and monitor succession plans and appointment processes with the aim of achieving our diversity objectives, to maintain Board representation of not less than 30% women, 30% men and the remainder of any gender and the same for senior executive positions.

2.4 Work and life balance

Virtus believes in assisting employees to maintain a healthy and holistic balance between work, family and other commitments, activities and interests. In roles where it is possible to do so, working from home arrangements can be made within teams, at the discretion of the manager. For jobs where it is not possible to work from home, alternative flexible arrangements can be discussed at the discretion of local management. All reasonable efforts will be made to accommodate workplace modifications for individuals who need them.

The Board will ensure that where employees are working from home or are at home on maternity or paternity leave, staff connection by email, intranet or other means will be maintained.

2.5 Ability not disability

When we employ and promote people, we consider ability and not disability. We aim to create an inclusive environment that supports people and removes artificial barriers from the workplace.

3 How we promote diversity

3.1 Steps we are taking and measurable objectives

Virtus is committed to an inclusive workplace that embraces and promotes diversity as part of our corporate culture.

Virtus participates in the equal opportunity for women in the workplace program administered by the Workplace Gender Equality Agency (“**WGEA**”). We aim to maintain Board representation of not less than 30% women, 30% men and the remainder of any gender, and the same for senior management positions.

Virtus is a member of Pride in Health + Wellbeing, Australia’s first and only not-for-profit program that provides year-round support in the provision of LGBTQIA+ inclusive services. Virtus participates in the Australian Workplace Equality Index (AWEI) and Health + Wellbeing Equality Index to encourage continuous improvement to organisational culture and workplace inclusion for gender and sexually diverse employees, patients and doctors.

Our policies and procedures ensure promotion of diversity and inclusion within the workplace.

Our induction, training and other programs will be designed to promote a culture of diversity, inclusion and participation of all genders and gender identities in the workplace and within leadership positions.

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3.2 The Board's role

The Board:

- (a) promotes diversity as an important strategic and cultural factor to achieve business objectives across the organisation;
- (b) determines and approves measurable objectives where appropriate for achieving diversity, including gender diversity across, and at various levels of, our organisation, subject to appropriate professional qualifications and experience;
- (c) annually assesses these objectives and the progress in achieving (if established); and
- (d) reviews and monitors the effectiveness of this diversity policy, including in relation to Board diversity.

4 Diversity of patients and consumers

4.1 Inclusive behaviours

Virtus adopts a 'behaviours over beliefs' approach to our interaction with patients and consumers. We treat all people with dignity and choose language, both verbally and in our public literature, which is inclusive and respectful of all genders, gender identities, sexual orientations, races and religions.

Virtus staff and doctors understand that behaviour impacts our patients and their families and that it is important we demonstrate that Virtus facilities are safe and inclusive for all individuals. Where management see it as appropriate, Virtus staff will be provided with the necessary diversity and inclusion training to ensure we are consistent and inclusive in our behaviours.

4.2 Genetic testing and diversity

We have a non-discriminatory approach to genetic testing of human embryos. We carry out preimplantation genetic testing (PGT) in compliance with the NHMRC ethical guidelines which state: "PGT must not be used for prevention of conditions that do not seriously harm the person to be born".

We do not regard a genetic variation that would result in an intersex state as being a condition that would "seriously harm" the person to be born. Where a variation of the sex chromosomes is noted on embryo testing, we discuss the findings, as we are bound to do, with prospective parents, in a non-judgemental and non-directive manner, encouraging the parents involved to consider the broader picture of their family and the individuals involved.

We aim to engage with the gender and sexually diverse communities to ensure that our clinical practices properly represent community expectations in this regard.

5 Publication of this policy and our progress

This policy will be made available to all directors and employees and will be available on Virtus' website.

We will provide information in Virtus' Corporate Governance Statement regarding:

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- (a) key features of this policy;
- (b) our measurable objectives for achieving gender diversity and our progress towards achieving them;
- (c) the proportion of women employees in our organisation, in our Senior Executive and on our Board; and
- (d) Our Progress towards the Australia Workplace Equality Index for LGBTQ+ inclusion in the workforce and the Pride Health and Wellbeing Index for client facing LGBTQ+ inclusion and similar measures for Virtus activity outside Australia.