



Code of Conduct

November

A message from our Chief Executive Officer

At Ryman, we're committed to building a culture where every team member contributes to a workplace built on respect, trust and doing the right thing, each day.

Each of us plays a part in maintaining the standards that make Ryman a special place to work and live. This Code of Conduct sets out the principles that guide our behaviour and what's expected of all of us, whatever our role. It provides practical advice for the decisions we must make every day – from standards for the work we do, how we manage gifts, to how we speak up about concerns related to resident care or safety.

While this document can't cover every situation, it reflects our shared commitment to integrity, respect and accountability. If you are ever in doubt about what's expected whether it's a small uncertainty or a serious concern, the answer is to ask. Speaking up ensures we all know the standard expected of all of us, and helps protect the people who rely on us. When we do this, we grow stronger as a team and as a business.



Naomi James
Chief Executive Officer
Ryman Healthcare

Our expectations of you and Ryman's commitment to you

Our Code of Conduct defines how we work, how we treat each other, and how we hold ourselves accountable.

This Code of Conduct has been approved by Ryman's Board of Directors, setting out the expected standard of conduct for everyone working for Ryman, including directors, executives, employees, contractors or agents who provide services on our behalf.

At Ryman you are expected to:

- Do your work with care and diligence and meet the standards of your role
- Conduct yourself professionally and respectfully
- Comply with all laws
- Act in the best interests of Ryman
- Demonstrate honesty and integrity in all actions
- Know and follow all Ryman policies, procedures, guidelines, and frameworks relevant to your role. These set the standard for our work and may be updated from time to time. All policies can be found on the company intranet.

What this means for you:

- Always follow our health and safety standards when doing work. If you do not feel safe or comfortable doing something, or see something that's unsafe, please stop, intervene and speak up.
- Follow all lawful and reasonable directions at work, and comply with all applicable laws, rules and regulations.
- Follow the professional standards required by your qualifications and memberships in relevant professional bodies, including maintaining any required qualifications and registrations.
- If you have read a policy or a procedure and something is not clear, ask your manager to explain.
- Speak up and report anything that you think might be in breach of the Code of Conduct, any of Ryman's policies or any law.

Ryman's responsibility to you:

- Provide and maintain a safe workplace
- Communicate the expectations and requirements for your role
- Treat you fairly
- Follow all legal requirements of an employer
- Be available to inform and provide guidance or clarification on Ryman policies and procedures and where required provide training on these
- Take appropriate action when concerns are raised, including Code of Conduct and policy breaches.

People, safety, residents and our community

Health, safety and wellbeing

Looking after the health, safety and wellbeing of our residents, team members, contractors, and communities is part of how we work. This is a shared responsibility and an important part of how we deliver care, run our business, and protect our people every day.

What this means for you:

- Promptly report health, safety and wellbeing risks, accidents, and incidents once it is safe to do so.
- Take action if you see unsafe situations – stop, intervene and speak up.
- Follow all health, safety and wellbeing instructions, and comply with Ryman's policies and procedures.
- Complete and apply relevant training, certification and induction as required.
- Take care of your own health and safety, and make sure your actions don't put others at risk.

Inclusivity and diversity

We believe everyone deserves to be treated with dignity, respect and fairness. We value diversity and inclusion in our workplace – welcoming people to be themselves and bringing out the best in others. All forms of bullying, harassment, sexual harassment, discrimination, offensive behaviour, or retaliation are unacceptable.

What this means for you:

- Treat everyone with dignity, respect and fairness.
- Speak up if you experience or observe behaviour that is not respectful or may breach Ryman's standards or policies.
- For more information refer to the Diversity, Equity, and Inclusion Policy, Bullying, Sexual Harassment & Undesirable Behaviour Policy (Australia), and Bullying and Undesirable Behaviour Policy (New Zealand).

Residents

Our residents are at the heart of everything we do. We are committed to delivering safe, respectful, high-quality care that upholds their rights, dignity, and wellbeing, in line with the Aged Care Act 2024 (Australia) and the Health and Disability Commissioner Act 1994 (New Zealand).

At Ryman you are expected to:

- Act with respect for residents' freedom of expression, self-determination and decision-making
- Act with respect for residents' privacy, dignity, and diversity
- Deliver care with skill, integrity, honesty, and compassion, including communicating in a way that supports understanding and informed decision-making
- Act to protect residents' trust, safety, and quality of life by delivering care and services free from violence, abuse, neglect, exploitation, discrimination, and sexual misconduct
- Take all reasonable steps to ensure residents are protected from harm
- Speak up if you believe their care or safety has been put at risk, including respecting the rights of residents and their families to raise concerns or complaints
- Maintain professional boundaries with residents
- Treat residents' property with care and integrity.

Community

We operate responsibly in our communities, engaging respectfully and working to reduce our environmental impact through thoughtful choices and sustainable practices.

Investors

Our investors are important to us and our business. We are committed to communicating openly and honestly, providing accurate and timely information, ensuring all investors have equal access.

Contractors and suppliers

We value relationships built on trust, honesty and respect. This means we keep business with our suppliers and contractors separate from any personal interests and do not let personal relationships influence our decisions. We expect our suppliers and contractors to follow the standards in Ryman's Supplier Code of Conduct.

How we do business at Ryman

Conflicts of interest

We make decisions that are fair and in Ryman's best interests.

What this means for you:

- Always put Ryman's and our residents' interest first when making decisions at work.
- Speak up if you're unsure whether a personal interest might give rise to a conflict with Ryman's interests.
- Let your manager know about any actual, potential, or perceived conflicts immediately and complete the Conflict-of-Interest Declaration on the company intranet.
- Get manager approval before taking on any other job or business activity that could create a conflict with your role at Ryman.

Gifting and entertainment

Sometimes we may be offered gifts or entertainment from residents, suppliers and contractors. Gifts can include travel, events, accommodation, goods, services, discounts, money or special terms. However, these must never influence decisions, create an unfair advantage, or even appear to do so.

What this means for you:

- Act with integrity by never giving, offering, or accepting bribes, facilitation payments, or kickbacks. If you have concerns that someone has offered or accepted any of these, you are encouraged to speak up under Ryman's Whistleblower Policy.
- Maintain professional integrity by never accepting gifts and money from residents or their families.
- Let your manager and General Counsel know in writing if you are offered or accept gifts or entertainment, from others that are valued over \$50 (including café or restaurant meals), so that these can be recorded in the gifts register maintained by Ryman.
- Do not accept gifts or entertainment if you think there is any expectation of special treatment. If you are unsure whether something could influence a decision, offers of gifts or entertainment should be declined.
- Charitable donations require Chief Executive Officer and Chief Financial Officer approval, and Ryman policy is not to support political causes.

Privacy and confidentiality

We all have a responsibility to protect private information about our residents, team members and the company. This means keeping all personal and confidential information secure and only using it for genuine work purposes, and only for the reason we collected it.

What this means for you:

- Keep all personal and confidential information private and never use it for personal gain. This includes documents, emails, messages, photos, or any other non-public information about Ryman and our residents.
- Only share information for work purposes, and only through official Ryman communication channels. Do not use personal email, social media, or other unofficial ways to store or share company or confidential information.
- Only share private information outside of Ryman, if you have the person's consent, if authorised by Ryman or required by law. If you are unsure, check with your manager first.
- Respect the privacy of residents, colleagues, and others you work with, and only share personal information or photos with their permission, or with the permission of a resident's family if required.

Protecting our company assets, information and equipment

We use our resources responsibly and with care.

We use our resources responsibly and with care. What this means for you:

- Use Ryman resources (including supplies, property, funds, time and information), efficiently, and only for work purposes.
- Take care of Ryman resources and equipment and protect against theft, damage, loss, or misuse.
- Ensure spending and contracts are approved in accordance with the Delegated Authority Policy.
- Speak up if you see misuse of company resources.

Insider trading and continuous disclosure

We follow NZX and ASX continuous disclosure rules. This means we protect confidential and price-sensitive information, and we never use it for personal or others' financial gain.

What this means for you:

- Keep confidential and price-sensitive information private until it is publicly released.
- If you become aware of something that could affect Ryman's share price and it hasn't been made public, let the General Counsel or your manager know immediately.
- If you are aware of non-public price-sensitive information from, or about, Ryman, keep it confidential and do not use it to buy or sell shares in Ryman, including sharing this information with friends and family.
- Only authorised Ryman spokespeople may speak to media, investors, or make public statements on behalf of Ryman.
- If you are buying or selling Ryman shares, comply with the requirements of the Securities Trading Policy. For example, do not buy or sell Ryman shares if you know price-sensitive information (financial results or major changes) that is not public yet. Some roles have extra steps before trading, so check the Securities Trading Policy.

Speaking up

At Ryman it is 'Safe to Say' – everyone is expected to speak up when something isn't right or if you think the Code of Conduct or other Ryman policies have been breached.

How do you speak up?

For general concerns such as everyday conduct issues or situations where standards aren't being met, please first speak with your manager or someone you are comfortable talking to within Ryman.

You can speak with:

- Your direct manager
- Another senior leader
- The People and Culture team
NZ: 0800 588 222
AU: 1800 922 988

Or email: humanresources@rymanhealthcare.com

Or call the HR confidential feedback line:

NZ: 0800 838 919
AU: 1800 431 139

If you don't feel comfortable speaking to anyone listed above, and you have concerns about serious wrongdoing, such as fraud, serious health and safety risks or unlawful or unethical behaviour, then you should report this in writing to one of the following:

- Chief People and Safety Officer
- General Counsel
- Chief Executive Officer

Alternatively, you can confidentially report to our external whistleblower service operated by PwC. Contact details for PwC, and more information on making a whistleblower disclosure, are in Ryman's Whistleblower Policy.

How will your complaint be dealt with?

Concerns raised in good faith will be taken seriously, treated sensitively, and handled confidentially.

Ryman commits to:

- Investigating complaints and disclosures thoroughly
- Treating everyone involved fairly and respectfully
- Supporting those who speak up, including protection from retaliation.

Where a breach of the Code of Conduct or policies is established, appropriate action will be taken – this may include disciplinary action as part of an employment process, notification to a professional standards body, or government authority.

Training

All employees will receive training on the Code of Conduct at least every three years.

Ownership and review

Approver	Ryman Healthcare Board
Date	November 2025
Reviewer	People, Safety and Remuneration Committee
Ownership	Chief People and Safety Officer
Review frequency	Every three years or earlier as required