

Healius Limited

Anti-Bribery and Anti-Fraud Policy

1. Introduction

1.1. Who does this Policy apply to?

The Anti-Bribery and Anti-Fraud Policy (**Policy**) applies to:

- all employees, consultants, and temporary staff of Healius Limited and its related bodies corporate (**Staff Members**).
- outsourced service providers performing work for the Healius Group (**Suppliers**).

1.2. What does this Policy cover?

The Policy:

- prohibits all Staff Members and Suppliers from offering, giving, or receiving bribes or engaging in any other corrupt practices, and
- provides a framework for reporting and responding to all forms of fraud committed against the Healius Group.

2. Related Documents

The Policy should be read in conjunction with the Healius Group:

- Gifts and Entertainment Policy;
- Political Donations Policy;
- Standards of Behaviour and Conduct Policy; and
- Whistleblower Policy.

If any requirement of this Policy conflicts with local law in a jurisdiction where Healius operates, local law will take precedence. However, where this Policy establishes a higher standard than local law, the stricter standard of this Policy will apply.

3. Anti-Bribery and Anti-Fraud Policy

All Staff Members and Suppliers are obligated to act with integrity and in a manner that minimises the risk of bribery and fraud.

3.1 Prohibited Conduct

The following actions are strictly prohibited:

- offering, promising, or providing any form of improper financial or other advantage to any person, whether directly or indirectly, with the intent to improperly influence a business or official decision.
- requesting, agreeing to receive, or accepting any improper financial or other advantage in exchange for an action, inaction, or decision.
- demonstrating recklessness or wilful blindness to signs of bribery and corruption, which may be construed as a breach of relevant laws and a violation of this Policy.

3.2 Legal Compliance

All Staff Members and Suppliers must comply with applicable anti-bribery and anti-corruption legislation, including but not limited to, the anti-bribery provisions of the *Australian Criminal Code 1995 (Cth)*.

3.3 Gifts and/or Entertainment

The Healius Group's *Gifts and Entertainment Policy* prohibits Staff Members from accepting gifts that place an obligation or create an expectation on the recipient. All gifts and entertainment must be given or received in compliance with this policy.

3.4 Political Donations

The Healius Group's *Political Donations Policy* prohibits Staff Members from making political donations on behalf of the Healius Group without prior approval. Such donations must be made for a proper purpose in furtherance of the democratic process and in compliance with this policy.

3.5 Charitable Donations

The Healius Group proudly supports several charitable causes through donation matching and volunteering. Staff Members must take reasonable steps to ensure that any donations given or received are not intended to improperly influence them or others. Please refer to the Healius Group's *Gifts and Entertainment Policy* for further information.

4. General Guidance

If a Staff Member or Supplier becomes aware of any situations or circumstances causing concern, or is unsure of whether a given situation may constitute fraud, bribery, or corrupt practices, they should immediately contact their manager. If for any reason they cannot discuss the issue with their manager, they can contact either:

- the Group Executive of their business unit; or
- a representative of Healius' Legal team, who can escalate the matter to the General Counsel, as necessary.

This ensures that guidance can be given and that the issue is dealt with appropriately.

5. Reporting Bribery and Corruption

Staff Members and Suppliers must promptly report suspected, attempted, or actual incidents of bribery, fraud, or breaches of this policy. Such matters should be reported to the relevant Group Executive and escalated to the Chief Financial Officer and/or General Counsel and Company Secretary to enable an appropriate response.

An investigation will then be conducted to determine whether or not the relevant allegations are substantiated. Please refer to the Healius Group's *Workplace Complaints, Grievances, and Investigations Policy* for further information.

Staff Members and Suppliers can also report matters to Healius' Whistleblower Service:

Phone: 1800 957 525

Email: disclosure@healius.com.au

Mail: PO Box 730
Milsons Point
NSW 1565

Weblink: ispeakup.co/healius

For further information about this process, please refer to the Healius Group's *Whistleblower Policy* on People Hub.

6. Breaches of this Policy

6.1 Employment or Engagement

The relationship of employment is characterised by obligations of honesty and fidelity owed by the employee to their employer. Engagement in fraud, bribery or corrupt practices is incompatible with this obligation of trustworthiness. Any Staff Member or Supplier who does not comply with this Policy may be subject to disciplinary action, up to and including termination of their employment or engagement.

6.2 Legal Proceedings

Bribery and corruption are serious matters that may constitute criminal behaviour. Staff Members or Suppliers who have taken part in bribery or corrupt conduct can expect the matter to be reported to the Police or other appropriate regulatory authority.

Where the bribery or fraudulent behaviour results in loss or damage to Healius, Staff Members and Contractors who have participated in such activity may also be the subject of legal action by Healius to recover resultant damages.

7. Governance and Policy Ownership

This Anti-Bribery and Anti-Fraud Policy is owned by the Chief Financial Officer and will be reviewed every two years by the Board unless required earlier.

Authorised by:

Paul Anderson
Managing Director and Chief Executive Officer
September 2025

Version Control

Version	Date	Description of Changes	Approver	Plan of record	Plan for publication
1.0	March 2016	Anti-Bribery and Anti-Fraud Policy		-	
1.1	February 2017	Minor amendments to accommodate organisational structure.		-	
1.2	February 2019	Minor amendments to accommodate update of business name from Primary to Healius.		-	
1.3	September 2025	Review of the Policy to reflect operational changes.	Healius Board	To be reviewed and approved every two years by the Board unless required earlier.	Externally and internally