

## Anti-Bribery and Corruption Policy

<b>Approved by</b>	Board of Healthia Limited
<b>Approval date</b>	May 2023
<b>Next scheduled review</b>	May 2025
<b>Covered under policy</b>	<p><b>Entities:</b> Healthia Limited, My FootDr (Aust) Ltd, Allsports (Aust) Ltd, Extend Rehab Pty Ltd, iOrthotics Pty Ltd, Access Ortho Pty Ltd, DBS Medical Pty Ltd, Natural Fit Footwear Pty Ltd, The Optical Company Pty Ltd, BIM Physiotherapy Group Holding Limited, Motion Health Group Holding Limited (NZ) and any other entity that is a subsidiary of Healthia Limited (collectively referred to throughout this policy as Healthia)</p> <p><b>Who:</b> This policy applies to all Healthia staff and to people who work within Healthia including:</p> <ol style="list-style-type: none"> <li>1. Board of Directors of any Healthia entity and Board Sub-Committee Members</li> <li>2. Executive, managers, clinic class shareholders and employees (whether full time, part time, casual, permanent or temporary), and</li> <li>3. Volunteers, students, contractors and consultants</li> </ol>
<b>Related policies</b>	<ul style="list-style-type: none"> <li>▪ Code of Conduct</li> <li>▪ Whistleblower Policy</li> <li>▪ Gifts and Benefits Policy</li> </ul>
<b>Related documents</b>	Not applicable
<b>Policy owner/s</b>	Group CFO

### Purpose

Healthia, its subsidiaries and related entities (“Healthia” or “the Group”) are committed to conducting its business and activities in a fair, ethical and professional manner and does not tolerate fraud, corruption and bribery.

Healthia acknowledges the serious criminal and civil penalties which may be incurred and the reputational damage which may be suffered should Healthia be involved in fraud, corruption or bribery.

Healthia has developed this policy to provide guidance to its Employees in understanding Healthia’s expectations in relation to ethical behaviour and to ensure the maintenance of high levels of integrity and transparency in their behaviour and business dealings.

This policy is also designed to assist Healthia and its Employees in complying with their legislated obligations relating to bribery and corruption and prohibits the giving or accepting of bribes or other improper payments or benefits and engagement in corrupt practices.

This policy does not prohibit the giving or receiving of normal and appropriate hospitality or gifts. Healthia’s *Gifts and Benefits Policy* provides guidance in relation to this. The *Gifts and Benefits Policy* should be read in conjunction with this policy.

### Scope

Healthia’s Anti-Bribery and Corruption Policy applies to all Healthia representatives who work within Healthia including:

1. Board of Directors of any Healthia entity and Board Sub-Committee Members

2. Executives, managers, clinic class shareholders and employees (whether full time, part time, casual, permanent, or temporary), and
3. Volunteers, students, contractors, and consultants

The policy applies to all sites and services involved in the carrying on of Healthia's business and is to be read in conjunction with Healthia's Code of Conduct, Gifts and Benefits policy, Whistleblower policy and Healthia's values.

## Policy

### 1. What is Bribery and Corruption?

Bribery is the offering, paying, accepting or soliciting of an advantage as an inducement for action which is illegal, unethical or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage and can take the form of gifts, loans, fees, rewards or other advantages.

Corruption occurs when someone abuses their position of trust for personal gain or advantage (whether directly or indirectly).

### 2. Prohibition on Bribery and Corrupt Practices

All Employees have an obligation to maintain ethical and honest behaviour in all business dealings and are strictly prohibited from engaging in bribery or corrupt practices, whether in their individual capacity or acting or purporting to act for or on behalf of Healthia.

Any Employee who is unsure whether an action constitutes a breach of this Policy is strongly encouraged to request further information and support from their manager or Healthia's Human Resources department.

### 3. Examples of Bribery and Corruption

The following behaviours are examples of Bribery and Corruption and are prohibited by Healthia:

- Giving or accepting money, gifts or benefits that will compromise, or appear to compromise a person's integrity and objectivity in performing their duties and/or with the intent of receiving or retaining an inappropriate benefit from the other person (whether directly or indirectly)
- Giving or accepting money, gifts and/or benefits that cause, or appear to cause a conflict of interest (whether directly or indirectly)
- Accepting a gift or benefit from a third party if it is known or suspected that it is offered or provided with the intention of influencing improper performance by Healthia or one of its Employees in return

The above list is not exhaustive and there are other behaviours and actions which may be considered bribery and/or corrupt practices.

In addition to the above, neither Healthia nor any of its Employees may threaten or retaliate against another Employee who has refused to commit a bribery or corruption offence or who has raised concerns under this policy.

### 4. Obligation to Report

Employees who are aware of, or suspect, bribery or corrupt practices are obliged to report this to their manager or Healthia's Human Resources department. Employees are encouraged to raise any such concerns at the earliest possible opportunity.

Any Employee who is approached by any other party (including, for example, another Employee, a supplier, vendor, client, customer, or patient) with an offer or request for that Employee to engage in bribery or corrupt practices must immediately notify their manager and provide as much detail and evidence as reasonably practicable.

Healthia's *Whistleblower Policy* provides protections for any Employee or person who reports wrongdoing or breaches of this Policy or other policies within Healthia. The *Whistleblower Policy* should be read in conjunction with this policy.

Any member of Healthia's management team who is aware of or notified of any breach of this Policy is required to report this knowledge to Healthia's Chief Financial Officer who must then notify any such breach to the Board of Directors.

## **5. Governance**

Healthia's Board of Directors has the overall responsibility for ensuring that this policy complies with Healthia's legal and ethical obligations and that all Employees comply with their obligations under this policy.

The Chief Financial Officer has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy.

## **6. Consequences of Breach**

All Employees are responsible for reading, understanding and complying with this policy.

A breach of this policy may constitute serious misconduct and result in consequences up to and including termination of an Employee's employment or engagement with Healthia. In addition, a breach of this policy could also involve the commission of an offence or breach of the law which could result in legal action being taken, including criminal proceedings.

## **Related Policies**

Other Healthia policies that should be read in conjunction with this policy are:

- Code of Conduct
- Whistleblower Policy
- Gifts and Benefits Policy

## **Related Documents**

Each employee that is governed by a professional association or body must also be aware of their obligations under each the associations/ organisation/ agent or statutory obligations. These may include, but are not limited to the following:

- Not applicable