

Healius Limited

Gifts and Entertainment Policy

1 Introduction

1.1 Who does this Policy apply to?

This Policy applies to all employees, contractors and temporary staff of Healius Limited and its related bodies corporate (together, the **Healius Group**) (**Staff Members**).

1.2 What does this Policy cover?

This Policy is designed to prevent Staff Members from seeking or accepting anything of value such as gifts, entertainment, meals, other food or beverages; gratuities, reimbursed expenses or other gains (**Gifts and Entertainment**) from, any person who conducts business with, or has some other association with, the Healius Group except in accordance with the guidelines set out in this Policy.

This Policy should be read in conjunction with the Healius Group's:

- Anti-bribery and anti-fraud Policy;
- Political Donations Policy; and
- Code of Conduct.

1.3 What are the consequences of breach of this Policy?

Acceptance of Gifts and Entertainment that is not in accordance with this Policy may result in the Healius Group taking disciplinary action against the relevant Staff Member.

Disciplinary action may include, but is not limited to:

- the issuing of a formal warning to the Staff Member; or
- the termination of a Staff Member's employment or engagement.

Any decision to take disciplinary action against a Staff Member is at the discretion of the management of the relevant Staff Member's business unit, the General Manager of that business unit and the CEO.

1.4 This Policy also applies to the seeking of Gifts and Entertainment

The principles of this Policy do not only apply to the acceptance of Gifts and Entertainment; they apply in the same way to the seeking or solicitation of Gifts and Entertainment by Staff Members. For example, a Staff Member who seeks unacceptable Gifts and Entertainment from a third party breaches this policy exactly as if that Staff Member had accepted such Gifts and Entertainment.

Where this Policy refers to acceptance or receipt of Gifts and Entertainment, such references also include the seeking or solicitation of such Gifts and Entertainment.

1.5 This Policy does not apply to the Giving of Gifts and Entertainment

This Policy does not cover the giving of Gifts and Entertainment by Staff Members on behalf of the Healius Group. Staff Members should refer to the Anti-bribery and anti-fraud Policy for guidance as to the provision of Gifts and Entertainment by or on behalf of the Healius Group.

1.6 This Policy does not cover Gifts and Entertainment from Healius to Staff Members

This Policy does not cover the giving of Gifts and Entertainment by the Healius Group to its own Staff Members. It covers Gifts and Entertainment from people or entities outside the Healius Group.

2 General Principles

When determining whether the acceptance of Gifts and Entertainment is appropriate, all Staff Members must ensure that the Gifts and Entertainment:

- are small in value and in accordance with general business practice;
- are offered or received as an act of appreciation or for other legitimate business purpose;
- do not place obligations or create expectations on the recipient;
- are appropriate to the relationship;
- are legal;
- conform with the rules or code of conduct of the offering or receiving organisation; and
- are made openly.

Refer to the Anti-bribery and anti-fraud Policy for more detail.

3 Policy

3.1 Aggregation of amounts over a rolling 12 month period

The following sections of this Policy set out amounts and categories of Gifts and Entertainment. Where an amount is specified, that amount applies to:

- any single gift;
- any single entertainment event; and
- multiple gifts or entertainment, in aggregate, over a rolling twelve month period ending on the date on which the most recent gift or entertainment is provided.

3.2 Valuation of Gifts and Entertainment

Staff Members and managers should use common sense and their usual commercial judgment in valuing Gifts and Entertainment.

3.3 Modest Gifts and Entertainment

Modest Gifts and Entertainment are Gifts and Entertainment valued at **up to and including \$100 per person**.

Modest Gifts and Entertainment do not usually require prior approval (as long as the general principles set out in section 2 above are satisfied).

3.4 Valuable Gift and Entertainment

Valuable Gifts and Entertainment are Gifts and Entertainment valued at **more than \$100 per person**.

Prior approval must be obtained from the persons designated below before accepting Valuable Gifts and Entertainment.

Please note that any approval of Gifts and Entertainment remains subject to the monetary limits of the relevant approver's authority under the Delegation of Authority matrix under the control of Group Finance.

Approval - Staff Members in general

Valuable Gifts and Entertainment valued at **more than \$100 per person up to and including \$250 per person** must be approved by the relevant line manager.

Valuable Gifts and Entertainment valued at **more than \$250 per person** must be approved by a direct report of the relevant business unit's General Manager (or the relevant direct report of the CEO).

Approval - CEO, CEO's direct reports and their direct reports

Where the recipient is a direct report of a General Manager (or other direct report of the CEO), the relevant approver for all Valuable Gifts and Entertainment valued at more than \$100 per person is the relevant General Manager (or other direct report of the CEO).

Where the recipient is a General Manager or other direct report to the CEO, Valuable

Gifts and Entertainment valued at more than \$250 per person must be approved by the CEO. Valuable Gifts and Entertainment valued at up to and including \$250 per person do not require prior approval.

Where the recipient is the CEO, CEO discretion applies as to acceptance of the Gifts and Entertainment, subject to the other provisions of this Policy and other relevant Policies such as those referred to in section 1.2 above.

3.5 Register of Valuable Gifts and Entertainment

The Healius Group's Register of Valuable Gifts and Entertainment is maintained by the Corporate Secretariat team.

Details of any Valuable Gifts and Entertainment for which prior approval is required under this Policy should be forwarded to cosec@Healius.com.au within 14 days of the receipt or approval of the relevant Gifts and Entertainment in the following format (you can paste the table below into your e-mail).

Date of Gift/Entertainme	Description of Gift/Entertainme	Value	Recipient	Approved by

3.6 Exceptions (where Gift and Entertainment may be accepted without prior approval)

A Staff Member may only receive Gifts and Entertainment that exceed monetary values outlined above without prior approval if cultural norms dictate that it would be insulting to decline it. The Gifts and Entertainment must then be immediately reported to the relevant Staff Member's General Manager minus one, who will decide whether they should be:

- retained by the Staff Member;
- retained for the benefit of the Healius Group;
- sold and the money donated to charity; or
- returned to the donor.

3.7 Unacceptable Gifts and Entertainment

Unacceptable Gifts and Entertainment are never permissible and cannot be approved by anyone.

Unacceptable Gifts and Entertainment include:

- any illegal Gifts and Entertainment;
- gift certificates where the value is more than \$500;
- cash or cash equivalents (such as loans, securities, and options);
- any Gifts and Entertainment that are a 'quid pro quo' (offered for something in return – see Healius' Anti-bribery and anti-fraud Policy for more details of what

to do in such a situation);

- any Gifts or Entertainment that are given so frequently that there could be a perception of impropriety; and
- any Gifts and Entertainment that are indecent, sexually oriented, does not comply with the Healius Group's commitment to mutual respect or that otherwise might adversely affect the Healius Group's reputation.

Any Staff Member who receives or is offered Unacceptable Gifts and Entertainment, must refuse or immediately return the relevant item, regardless of cultural norms or the potential to cause offence. The Gifts and Entertainment must also be reported to a direct report of the relevant business unit's General Manager.

3.8 Monitoring and audit of Gifts and Entertainment

Staff Members should be aware that any receipt of Gifts and Entertainment (whether declared or not) may be monitored by the Healius Group and is subject to scrutiny by the Healius Group's Internal Audit function.

4 Other

4.1 Dealing with Government Officials

Special care must be taken when dealing with government officials. While it is acceptable to promote the Healius Group to government-employed decision makers or potential partners, and to participate in events for such purposes, Staff Members should ensure the receipt of inappropriate Gifts and Entertainment is avoided.

Staff Members should refer to the following policies for further information about dealings with government officials and politicians:

- Anti-bribery and anti-fraud Policy; and
- Donations Policy.

4.2 Expenses

All Staff Members should treat expenses in the same way as personal expenditure. Expenses should always be reasonable and appropriate. Staff Members should refer to their division's relevant Expenses Policy for further information.

5 Status of Policy and updates

This Policy does not form part of, and is expressly excluded from being incorporated into any contract of employment between any company in the Healius Group and any other person.

This Policy does not have any force or effect in relation to Gifts and Entertainment received before the policy commencement date.

This Policy may be updated or revised from time to time. Updated or revised versions of this Policy will be made available on the Healius Group's intranet site, PRIME. It is each Staff Member's responsibility to access PRIME to ensure he or she has is familiar with the most recent version of this Policy.

Approved

Date: 21 February 2017

Yvette Cachia

Group Executive – People & Legal

Version History

Version	Date	Comment
1.0	July 2016	Original – Policy commences from this date (including rolling 12 month Gift & Entertainment value count)
1.1	February 2017	Minor amendments to accommodate updates to position titles and organisational structure
1.2	February 2019	Minor amendments to accommodate updates to business name from Primary to Healius