

# Healius Limited

## Political Donations Policy

### 1 Introduction

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#### 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 ensure that any Political Donations made by or on behalf of the Healius Group are made in accordance with relevant laws and regulations, are open and transparent and are made for a proper purpose in furtherance of the democratic process.

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

- Anti-bribery and anti-fraud Policy;
- Gifts and Entertainment Policy; and
- Code of Conduct.

#### 1.3 What are the consequences of breach of this Policy?

Any Political Donations that are not made in accordance with this Policy will be investigated (see Workplace Investigations Guidelines) and may result in the Healius Group taking disciplinary action against any Staff Member knowingly involved in the making of the Political Donation.

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, and the General Manager of that business unit.

### 2 General principles

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#### 2.1 What constitutes a Political Donation?

The definition of a Political Donation is broad, and generally includes any disposition of goods, property or services provided without consideration, or with inadequate

consideration, as well as ‘indirect’ gifts or donations to third parties with the intention of benefiting a particular candidate or party.

A prospective donor should carefully consider the definition of a gift or political donation that applies in each jurisdiction to determine whether what is being given falls within the disclosure obligations.

## 2.2 Disclosure Obligations

Generally, disclosure obligations apply to gifts or donations to:

- a registered political party, or State branch or division of a registered political party;
- a candidate in a general election, by-election or upper or lower house election in any Australian parliament, and in some cases councillors, members or mayors of a local government area; and
- associated entities and related parties such as campaign committees, and related bodies corporate. Each jurisdiction differs in its treatment of related parties, and in some cases deems a gift to a related party to be a gift to a registered political party or candidate for the purpose of aggregating donations to reach the disclosure threshold.

The reporting obligations on donors generally comprise:

- an annual reporting obligation to the relevant State or Commonwealth electoral commission in respect of gifts or donations made over the financial year; and / or
- separate reporting requirements for gifts to candidates during election periods (in this case, the “disclosure period” [being the specified period over which gifts or donations to candidates must be disclosed] may vary across jurisdictions).

## 3 Policy

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### 3.1 Making a Political Donation

Staff Members should not make Political Donations on behalf of the Healius Group without prior approval from the Group Executive – Government. It is the responsibility of the Government Relations team to ensure all relevant laws and disclosure requirements are complied with. Any Political Donations made by the Healius Group will be disclosed as required under relevant laws.

### 3.2 Bribes and Gifts and Entertainment

It is unacceptable to attempt to bias a decision of a Government Official by offering personal gifts and entertainment. In particular, the offering of bribes to anyone is prohibited. Behaviour of this nature is illegal in Australia and may have detrimental effects for the Healius Group and any Staff Member who engages in this conduct. Please see the Anti-bribery and Corruption Policy and the Gifts and Entertainment Policy for further information.

### 3.3 Dealings with Government Officials and politicians

Care should be taken when dealing with Government Officials and politicians. All dealings with Government Officials or politicians should be co-ordinated by the Government Relations team and approved by the Group Executive – Government. If a Staff Member is contacted by a Government Official or politician they should refer their request to the Government Relations team.

### 3.4 Guidance and Reporting

If a Staff Member becomes aware of any situations or circumstances causing concern, the Government Relations team should be immediately contacted. This ensures that guidance can be given and that the issue is dealt with appropriately. Additionally, any general queries can also be directed to the Government Relations team.

## 4 Governance

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Annual donation amounts will form part of the Group's annual budget approved by the Board.

All donations within the Board-approved annual budget will be notified to the Board through the usual monthly Board reporting cycle.

Any donations outside the Board-approved annual budget must be approved by the Board in advance.

## 5 Status of Policy and updates

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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 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.

### Version Information

Version	Date	Comment
1.0	February 2018	Original
1.1	February 2019	Minor amendments to accommodate updates to business name from Primary to Healius