

Anti-Bribery & Anti-Corruption Policy

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1. PURPOSE

Myhealth is committed to maintaining a strong culture of ethical behaviour and corporate compliance in our business activities. Myhealth has zero tolerance for bribery and corruption within and outside of Australia. The purpose of the Anti-Bribery and Corruption Policy is to establish clear guidelines for how all employees and contractors should conduct themselves, in order to prevent unethical behaviour, promote integrity, and ensure compliance with relevant laws thereby safeguarding Myhealth’s reputation and credibility.

2. SCOPE

This policy applies to executive officers, board of directors, members of management, casual and permanent employees, contractors, consultants and agents of Myhealth, collectively referred to as (**‘Myhealth Personnel’**).

This Policy prohibits Myhealth Personnel from engaging in any form of bribery or corruption practices both within and outside of Australia

Myhealth Personnel must exercise care in accepting hospitality, entertainment or gifts over and above that required for the normal conduct of business or which may compromise your impartiality. In addition, receiving a gift or benefit may create, or appear to create a conflict of interest.

This policy is not limited to the workplace or work hours. This policy extends to all functions and work-related activities, which may include work lunches, community engagements, fundraising events, conferences and other function or dealings that may be associated with Myhealth’s business or reputation.

Myhealth Personnel can find some examples of Potential Red Flags that may arise during the course of working for or providing services to Myhealth in **Appendix A**.

3. DEFINITIONS AND ACRONYMS

Term	Acronym	Definition
Anti-Bribery and Anti-Corruption Policy	ABC Policy	means this Anti-Bribery and Anti-Corruption Policy, including any subsequent revisions and supplemental guidelines;
Bribe		Bribes may be durable or consumable, and may include one or more of the following, but not limited to: <ol style="list-style-type: none"> i. Gifts (cash and non-cash); ii. Discounts; iii. Benefits and ‘perks’ to relatives including employment, education and training opportunities; iv. Unwarranted allowances or expenses or reimbursement for travel expenses; v. Kickbacks or Secret Commissions; vi. Facilitation or gratification payments; vii. Donation to a Myhealth Fundraiser, Political or charitable donations; viii. Loans; ix. Reciprocal favours; x. Community outreach and stakeholder engagement expenses; and xi. Lavish corporate hospitality
Bribery		Bribery is the act of offering, promising, giving or accepting a benefit with the intention of influencing a person who is otherwise expected to act in good faith or in an impartial manner, to do or omit to do anything

		in the performance of their role or function, in order to provide the person or entity with business or a business advantage that is not legitimately due. Merely offering a bribe will usually be sufficient for an offence to be committed.
Business Partners		Third parties who interact with others on behalf of Myhealth such as, but not limited to; agents, brokers, consultants, intermediaries, joint venture partners or co-investors.
Executive Team Member		Members of the Executive Leadership Team (including the CEO, CFO, COO, and similar roles), Myhealth directors (including Myhealth Medical Holdings Pty Ltd and any subsidiaries).
Facilitation Payment		A facilitation payment (also known as 'grease payments') are payments made for certain government services or to accelerate government processes that is otherwise legally entitled by the person without making any payments. They are typically made to expedite a routine administrative function of a minor nature such as telephone connection, issuing a driver's licence or visa.
Gratification Payment		refer to any form of payment, gift, or benefit given to influence or reward the recipient for improper performance of their duties. Such payments are typically intended to secure business advantages or favorable treatment and are strictly prohibited under this ABC Policy.
Grease Payment		See " <i>Facilitation Payment</i> "
Kickback		See ' <i>Secret Commission</i> '
Myhealth		refers to Myhealth Medical Holdings, Myhealth Medical Group and all Myhealth Medical Clinics operated by Myhealth Medical Group
Myhealth Personnel		Means any current employee of Myhealth and includes, directors, members of management, casual and permanent employees, contractors, consultants and agents wherever located.
Money Laundering		Money laundering is the process by which a person or entity conceals the existence of an illegal source of income and then disguises that income to make it appear legitimate.
Public Officials		means any person who is a member, an officer, an employee, or a servant of a public body, local or foreign.
Secret Commission		Secret Commissions (also known as 'kick-backs') arise where a person or entity offers or gives a commission to an agent or representative of another person that is not disclosed by that agent or representative to their principal. Such a payment is made as an inducement to influence the conduct of the principal's business.

4. RESPONSIBILITIES

All **Myhealth Personnel** must:

- a. not accept any money or opportunity or other benefit which could be interpreted as an inducement,

secret commission or bribe;

- b. not accept gifts, hospitality, entertainment or anything of value that might have or appear to have obligations attached;
- c. not offer or give anything of value, or solicit any inducement, that may conflict with your work or your duties to Myhealth;
- d. ensure any approved grants or donations to charities or organisations made on behalf of Myhealth are recorded in the Myhealth register for gifts, entertainment, grants and donations; and
- e. not cause or authorise any conduct that is inconsistent with this Policy.

5. PROCEDURE/POLICY

5.1 BRIBERY

- a. A bribe can take many forms. The benefit that is offered, given, or accepted may be monetary or non-monetary.
- b. Bribery may be both direct and indirect, for example the following can constitute bribery under anti-bribery law:
 - i. a person procures an intermediary or an agent to make an offer which constitutes a bribe to another person; or
 - ii. an offer which constitutes a bribe is made to an associate of a person who is sought to be influenced.
- c. All Myhealth Personnel must not give, offer, promise, accept or request a bribe and must not cause a bribe to be given, offered, promised or accepted by another person whether it is for their own personal benefit or for the benefit of Myhealth.
- d. Myhealth under no circumstances tolerates any bribe for the purposes of obtaining or retaining business for Myhealth, provide an advantage to the business of Myhealth, or influence a business decision in favour of Myhealth. Myhealth does not tolerate such acts of bribery even in a personal capacity.

5.2 PROHIBITED CONDUCT

Most countries have laws prohibiting bribery of public officials and, sometimes, private individuals. There are potentially serious consequences, including fines and imprisonment, for contravention of such laws both on the part of the individual involved and Myhealth. To this end:

- i. you must not offer, promise, pay, solicit or accept bribes, kickbacks, secret commissions to agents or improper payments in any form;
- ii. you must not engage in any form of corrupt business practice, whether for the benefit of Myhealth, yourself or another party;
- iii. facilitation payments are prohibited (see section 5.8);
- iv. any requests for bribes or facilitation payments must be immediately reported to the General Counsel.
- v. Gifts, hospitality and entertainment, donations, sponsorships and political contributions have the potential to be misused as a cover for bribes or improper

payments for the purpose of influencing business decisions or obtaining preferential treatment. For this reason, Myhealth has adopted special rules in relation to these types of payments to ensure openness and transparency (refer to sections 5.3 to 5.6 below).

5.3 GIFTS, HOSPITALITY & ENTERTAINMENT

Gifts, hospitality and entertainment, is not limited to, the receipt or offer of gifts, meals, tokens of appreciation and gratitude, or invitations to events, functions, or other social gatherings, exchanged between Myhealth Personnel and an external party. While the giving or accepting of gifts, hospitality or entertainment is a legitimate means to develop and maintain good business relationships, there are limitations imposed by Myhealth upon such conduct.

- a. The practice of accepting or offering gifts, entertainment or hospitality may vary between and industries. What may be normal and acceptable in one may not be in another. It is therefore a matter to be approached conservatively and prudently by Myhealth Personnel.
- b. In principle:
 - i. the authorising, offering, promising, giving or accepting of anything of value (gifts, hospitality or entertainment) to or from a Government Official or an external party which may unduly influence business decision-making or cause others to perceive that there has been undue influence is prohibited.
 - ii. The authorising, offering, promising, giving or accepting of cash or items readily convertible into cash to or from a Government Official or an external party, either directly or indirectly, (except in the form of legitimate payment for a good or service under a contract) will almost always be suspicious and indicative of an improper motive and is prohibited.
- c. Myhealth Personnel may offer or accept gifts, hospitality and entertainment, provided they:
 - i. are not prohibited or limited by applicable laws and regulations;
 - ii. are not given knowingly that they breach the recipient's internal policies and standards;
 - iii. are given or received in good faith without expecting any benefit in return;
 - iv. do not influence, or are not perceived to influence objective business judgement;
 - v. are for the sole purpose of general relationship building;
 - vi. are tasteful, decent and consistent with generally accepted standards of professional courtesy; and
 - vii. fall within reasonable bounds of value and relevant internal approval is received and given or received in a transparent manner.
- d. Myhealth prohibits Myhealth Personnel from, amongst others:
 - i. accepting or providing cash, gifts readily convertible to cash or payments for personal benefit;
 - ii. accepting or providing gifts, hospitality and entertainment to potential and existing clients/service providers that are parties to a contract that is in the negotiation phase, or potential and existing clients/service providers participating in a tender process;
 - iii. accepting or providing gifts, hospitality or entertainment that is lavish and/or

frequent, that creates a real or implied obligation;

- iv. extending or accepting business terms or arrangements that are more favourable than those normally offered;
 - v. accepting gifts at home; and
 - vi. offering and accepting entertainment and hospitality for events at which Group personnel will not be present.
- e. Subject to paragraphs 5.3 (b) and (d) above, Myhealth Personnel may offer or accept gifts, hospitality and entertainment of:

Estimated Value*	Record in Register	Approval
Under \$200	No	No
Over \$200	Yes	<p>Myhealth Personnel require their Senior Manager or Executive Management Officer prior approval.</p> <p>Senior Manager require Executive Management Officer prior approval.</p> <p>Executive Management Officers require CEO approval.</p> <p>CEO and Directors require Myhealth Board Chair's prior approval.</p> <p>Board Chair requires CEO prior approval.</p>

*The value of gifts should be estimated in good faith based on fair market value (inclusive of all applicable taxes) in the local jurisdiction. Where the value of the gift cannot be readily determined, the retail cost of other similar items should be used as a comparison. Where there is doubt as to whether a gift exceeds a particular limit, it should be treated as if it does.

- f. Any gifts, hospitality and/or entertainment offered to or by Myhealth Personnel above \$200 that are accepted must be recorded in the Register of Gifts, Entertainment and Hospitality along with the relevant prior written approval (See **Appendix B**). In addition, declined gifts, hospitality and/or entertainment offered to or by Myhealth Personnel above \$200 must be recorded in the Register of Gifts, Entertainment and Hospitality if the intended recipient considers that there was a clear risk of a conflict of interest involved in the offer. If unsure, the intended recipient should escalate to their approval point for consideration.

5.4 BUSINESS TRAVEL

- a. Myhealth Personnel must not accept offers of travel related to their role as an employee of Myhealth. If an invitation to attend an event, visit business partners, supplier or customer is offered, approval should be requested from the relevant Executive Management Officer. Executive Management Officers should obtain approval from the Chief Executive Officer (CEO). The CEO should obtain approval from the Chair of the Board. The Chair of the Board should obtain approval from the CEO.
- b. The relevant Executive Management Officer will assess whether the travel would serve a valid

business purpose and whether the offer of travel could influence, or could be perceived to influence, decision making by Myhealth, employees or contractors. If concerns exist in relation to the suitability of the offer of travel, the offer should be declined. Where an inappropriate gift or offer has been made but declined by a Myhealth employee or contractor, the employee or contractor must inform their manager and Executive Management Officer about the offer.

- c. Myhealth Personnel must not offer travel or entertainment in any circumstance, with intent to influence decision making by a person outside Myhealth in relation to a decision that affects Myhealth.

5.5 POLITICAL DONATIONS AND ATTENDANCE AT EVENTS

- a. Myhealth does not make political donations to any political party, politician or candidate for public office within Australia. Unless otherwise approved by the Board, all Myhealth Personnel are prohibited from making such donations:
 - i. for and on behalf of Myhealth; or
 - ii. using Myhealth funds; or
 - iii. if it can be construed to be made for and on behalf of, or for the benefit of, Myhealth.
- b. Attendance at political functions, as a Myhealth representative, is permitted where there is a legitimate business reason. All individuals attending political functions as a Myhealth representative are required to notify the CEO prior to attending the functions. Details of the attendance, including the cost of attendance and the approval, must be recorded on the Register of Gifts, Entertainment and Hospitality maintained by the General Counsel.

5.6 GRANTS, SPONSORSHIPS OR DONATIONS

- a. Grants, sponsorships or donations serve to strengthen community relations, but can be misused to inappropriately influence business relationships.
- b. No donation, sponsorship or other financial contribution should be made in circumstances that could be reasonably regarded as unduly influencing the recipient (or associated entity) or creating a business obligation on the part of the recipient (or associated entity). For example, do not make donations or other financial contributions to people or organisations (or entities associated with them) with whom you are involved in a decision-making process.
- c. Any donations, sponsorships and charitable contributions by Myhealth must be done with the approval of the CEO and it must be done in a transparent manner for social and moral responsibility in compliance with relevant laws. It should never be paid in exchange for any business implications to Myhealth, whether it is to obtain a business, or to obtain some form of advantage for the business of Myhealth.
- d. Myhealth Personnel may make donations and charitable contributions in their personal capacity, but it should never be in exchange for any improper purposes that affects the business of Myhealth.
- e. Myhealth Personnel should not agree or promise to provide any form of political donation or support particularly where it is to obtain any business or advantage to the business of Myhealth. Any requests for political donations should be brought to the attention of the CEO immediately and requires approved by the CEO.
- f. Any political donations above a level determined in the Federal legislation must be disclosed annually to the Australian Electoral Commission and will be published on its website.

5.7 USE OF BUSINESS PARTNERS TO ENGAGE IN CORRUPT CONDUCT

- a. Business Partners must be chosen especially carefully and engaged appropriately, as any improper conduct on their part could damage Myhealth's reputation and potentially expose Myhealth and individual Myhealth Personnel to criminal or civil liability or other penalties.
- b. It is never permissible to engage or do business with a Business Partner if there is a material risk, they will violate anti-corruption laws or Myhealth's anti-corruption policies when acting on Myhealth's behalf with Government Officials or individuals or companies in the private sector.

5.8 FACILITATION PAYMENTS, SECRET COMMISSIONS AND MONEY LAUNDERING

- a. Myhealth does not and prohibits the making of facilitation payments, secret commissions, and money laundering by Myhealth Personnel. This prohibition on making facilitation payments, paying or receiving secret commissions and any money laundering, applies to Myhealth Personnel acting within or outside Australia.
- b. While some countries laws permit facilitation payments, others do not. Myhealth follows the stricter approach and prohibits Myhealth Personnel from making facilitation payments to Government Officials or private parties even where these payments are customary in the country where the payment is made and are intended to expedite or secure the performance of permitted routine government or other action that does not involve the exercise of discretion.

5.9 PUBLIC OFFICIALS AND GOVERNMENT DEALINGS

- a. When dealing with Public Officials, Myhealth Personnel should ensure all activities are conducted at arm's length with the utmost professionalism and that any giving or receiving of gifts do not relate to, in any form whatsoever, the public official's dealings or public duty and do not give the perception of attempting to gain an advantage for the business of Myhealth.
- b. Any hospitality of or gifting to Public Officials, subject to the approval of the CEO, are for circumstances where it is reasonable to facilitate genuine promotional, business, or educational meetings. Any hospitality provided and gifts given must be without expectation of any influence exerted on the Public Official in exchange for any commercial outcome for the business of Myhealth, and should always be at a reasonable and modest value.
- c. Any tender processes participated by Myhealth or its Clinics should be done in a transparent manner and in accordance with relevant Myhealth processes.

5.10 COMPLIANCE WITH THE LAW

All Myhealth Personnel are responsible in ensuring that they comply with all laws and regulations with respect to Anti-Bribery and Anti-Corruption within and outside Australia including but not limited to the Australian Criminal Code. No excuses or exceptions will be acceptable for non-compliance of any local laws and regulations where Myhealth conducts its businesses.

5.11 POLICY BREACHES & ESCALATION PROCEDURES

- a. Any violation of this Policy by Myhealth Personnel will attract serious repercussions and disciplinary action after due inquiry. Where there is strong evidence of breach of this Policy by any Myhealth Personnel, the Personnel may be summarily dismissed and will not be allowed to be employed in any other companies of Myhealth Medical Group or Myhealth Medical Holdings.
- b. Any Myhealth Personnel who are found to have assisted or facilitated the violation of this Policy, whether actively or by way of negligence or omission, will also be deemed to have breached this Policy and committed a misconduct that is liable for dismissal from their employment.
- c. Myhealth Personnel who become aware of a violation or potential violation of this Policy or the law, must report the matter in writing within 24 hours to their manager and to the General Counsel or follow the procedures in the Myhealth Whistleblower Policy.
- d. Disclosures made by Myhealth Personnel making a bona fide report of an alleged violation in compliance with this Policy will be protected under the Myhealth Whistleblower Policy.
- e. All Myhealth Personnel are responsible for compliance with this policy and must adhere to the following escalation protocols. Escalations should be actioned immediately or as soon as possible upon identification. The following table defines the escalation requirements.

Staff Member Implicated	Escalate and Report	
	Individual reporting breach escalates to:	General Counsel escalates to:
Executive Team Member or Board of Directors	General Counsel Nina.stamell@myhealth.com.au	Board Chair, Chief Executive Officer (if Chair is implicated)
Senior Managers		Applicable Executive Team Member
Myhealth Personnel		Applicable Senior Manager

- f. The General Counsel will also provide regular reports to the Board of Directors regarding all outstanding matters to enable effective monitoring of action taken.
- g. Any Myhealth Personnel who beach this Policy may also be liable for criminal and civil liability which may result in imprisonment and/or significant financial penalty.

5.12 MAINTENANCE ELEMENTS

a. Training and communication

- i. Requirements of employees under the Policy are embedded within annual mandatory training and included within the Code of Conduct. Employees will be provided with training about the policy and their rights and obligations under it.

- ii. This Policy will be communicated and made available to all relevant stakeholders through IntelliHR and Myhealth’s external websites.

b. Waivers and exceptions

- i. If Myhealth Personnel have any concerns or believe an action or inaction is improper, unlawful or otherwise in breach of this Policy, Myhealth Personnel are required to contact Myhealth General Counsel for guidance.
- ii. If Myhealth experiences a loss of business as a result of any Myhealth Personnel refusing to offer or accept a bribe or engage in any other conduct which would be a breach of the Policy, the relevant Personnel will not be penalised.
- iii. Exceptions to this Policy will be rare and requests should be made in writing to Myhealth’s General Counsel.

6. RECORD KEEPING & TRAINING REQUIREMENTS

- a. All Myhealth Personnel are required to complete and undertake all relevant documentations and processes particularly where it relates to anti-bribery and anti-corruption initiatives. All accounts, invoices and other documents and records relating to dealings with third parties, must be prepared and maintained with strict accuracy and completeness. No accounts may be kept "off the books" to facilitate or conceal improper payments.
- b. All expenditure by Myhealth Personnel for gifts, entertainment and hospitality must be included in the expense reports and approved in accordance with relevant Myhealth expense and reimbursement procedures.
- c. All new Myhealth Personnel will undertake training on this Policy as part of their induction process and existing Myhealth Personnel will receive regular updates on this Policy as part of their ongoing training.
- d. Any failure to comply with this clause 6 may impact the individual Myhealth Personnel’s performance review and, where it is a severe non-compliance, the Myhealth Personnel may be subject to further disciplinary action. Where the facts and circumstances require, repeated failure to undertake proper record keeping or undergoing compulsory trainings may warrant the dismissal of the individual Myhealth Personnel.

7. RELATED AND SUPPORTING DOCUMENTS

- Myhealth Whistleblower Policy (HR-006)
- Myhealth Code of Conduct (HR-001)

8. DOCUMENT CHANGE HISTORY

Version	Date	Summary of Changes	Changes compiled by	Changes approved by
01	Oct 2024	Policy Introduced	Tamara Sanguigni	Robert Reid, Myhealth Board Chair

9. REVIEW AND PUBLICATION OF THIS POLICY

- (a) This Policy will be reviewed on a periodic basis, and at least once two years to ensure it is operating effectively.
- (b) This policy is available on IntelliHR and the Myhealth's website

Appendix A – Potential Red Flags

The following is a list of bribery and corruption “red flags” that may arise during the course of working for or providing services to Myhealth. The list is for illustration only and is not intended to be exhaustive. If you encounter any of the following, you must report them promptly in accordance with sections 5.11 of this ABC policy.

- You learn that a third party engages in, or has been accused of engaging in, improper business practices
- You learn that a third party has a reputation for paying bribes
- A third party insists on receiving a commission or fee payment before committing to sign up to a contract with Myhealth, or carrying out a government function or process for Myhealth
- A third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made
- A third-party request that payment is made to a country or geographic location different from where the third party resides or conducts business
- A third-party request for an unexpected additional fee or commission to “facilitate” a service
- A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services
- You learn that a colleague has been taking out a particular supplier for very expensive and frequent meals
- A third-party request that a payment is made to “overlook” potential legal violations
- A third-party request that Myhealth provide employment or some other advantage to a friend or relative
- You receive an invoice from a third party that appears to be non-standard or customized
- A third party insists on the use of side letters or refuses to put terms agreed in writing
- You notice that the Company has been invoiced for a commission or fee payment that appears large given the service stated to have been provided
- You are offered an unusually generous gift or offered lavish hospitality by a third party



Appendix B – Gifts and Hospitality Register

Central [Gifts, Hospitality & Entertainment Register](#) of all gifts and hospitality offered >\$200 maintained by **General Counsel**.

Name	Email	Date offered	Date accepted/ rejected/ received	Date recorded (within 3 days being offered)	Gift / Hospitality (describe)	Who gift or hospitality was received from	Value \$ AUS	Result - whether the gift /hospitality was declined or accepted, reason for acceptance and authorisation if required
		DD/MM/YY	DD/MM/YY	DD/MM/YY			\$0.00	

END OF DOCUMENT