



# Anti-Bribery and Corruption Policy

## Introduction

The Austco Healthcare Board of Directors has endorsed this Anti-Bribery and Corruption Policy to support the Austco Healthcare Limited Code of Conduct and Corporate Governance Statement.

Austco Healthcare Limited is committed to minimising the risk of fraud and corruption through responsible corporate governance, ensuring that it has appropriate internal controls in place to promote compliance with anti-bribery and corruption laws in Australia where it conducts business.

Austco Healthcare Limited recognises the financial performance and reputation of the Company is impacted by the actions of the Company, Directors, employees, subcontractors, suppliers and other third parties. Austco Healthcare Limited seeks relationships with parties that share the Company's commitment to lawful business practice conducted to a high standard of ethical behaviour and conduct.

## Policy Statement

Austco Healthcare Limited has zero tolerance to any form of bribery and corruption. Austco Healthcare Limited seeks to create a culture and operating environment whereby our employees and other parties do not engage in corrupt business practices. Key operating practices underpinning this objective include:

- Due diligence is conducted on parties who are doing business with Austco Healthcare and they are reputable, competent and qualified to do the work;
- Legal assurance that any proposed arrangement complies with all applicable laws;
- There is no unmanaged conflict of interest, actual or perceived, that would make any engagement inappropriate;
- The party doing business with Austco Healthcare understands Austco Healthcare's expectations, its Code of Conduct and this policy;
- The provision of gifts or benefits to public officials, politicians or political parties, or relatives or associates of public officials, politicians or political parties is prohibited;
- The giving, receiving, offering or promising of a bribe, facilitation payment or secret commission are expressly prohibited
- Immediate reporting of any actual or suspected instance of bribery corruption to management.

## **Scope**

This policy extends to all employees, directors and third parties including subcontractors. Training and awareness programs are conducted across the group and all senior managers are committed to supporting this policy.

Any breaches of this Policy must be reported to the Board.

## **Definitions**

Bribery is the offering or making of a payment of value either directly or indirectly to influence a person's decision making, to secure an unfair advantage or to enter a dishonest arrangement.

Corruption is the abuse of a position or trust to gain an unfair advantage.

## **Conflicts of Interest**

Conflicts of interest arise when an individual has competing interests or loyalties, for example to family, friends or colleagues. Conflicts of interest are a significant contributor to fraud and corruption. Austco Healthcare Limited requires directors and employees to avoid entering relationships which may result in a conflict of interest with, or be prejudicial, to the business of Austco Healthcare Limited. Employees must not be involved in any conduct or activity that may compromise their ability to make impartial business decisions.

## **Gifts and Benefits**

The giving or receiving of gifts and benefits may create an actual or perceived obligation or influence on the receiver doing their duties with impartiality. This could result in both financial and reputation loss for Austco Healthcare Limited. As such, Austco Healthcare Limited prohibits the giving and receiving of gifts and benefits to public officials, politicians or political parties, or relatives and associates of public officials, politicians or political parties. The giving and receiving of gifts with non-government related entities should be token in nature (e.g. provision of refreshments for a meeting). Approval from one level above your line manager is required for the giving or accepting of non-token gifts.

## **Facilitation Payments and Secret Commissions**

Facilitation payments are customary, unofficial minor payments to secure or speed a routine government action. These payments may be legal in some circumstance but are generally difficult to distinguish from a bribe. As such, offering or making a Facilitation Payment of any kind is prohibited by Austco Healthcare Limited, regardless of the provisions of applicable law. Additionally, Austco Healthcare Limited prohibits the use of a third party to make facilitation payments on our behalf.

Secret Commissions are payments made to influence an outcome or gain advance and are indistinguishable from corruption in law. Austco Healthcare Limited has zero tolerance to the payment of a secret commission or the use of a third party to pay a secret commission on our behalf.

### **Violations of Policy**

A violation of this policy may result in disciplinary action including the termination of employment or engagement. A breach of this policy may also represent a breach of legislation and result in legal or regulatory action including criminal charges, revocation of licenses, reputation damage and financial loss to the employee, the Group or the third party.

### **Reporting violations**

Where an employee knows or suspects that there have been breaches of this policy, they should raise their concern with their immediate manager in the first instance. However, where an employee feels uncomfortable in raising a concern in this manner or is unsatisfied with the response received, the concern can be raised via the reporting in Austco Healthcare's whistleblower policy.

Austco Healthcare Limited Anti-Bribery and Corruption Policy – July 2020