

Healius Group Standards of Behaviour and Conduct Policy

1. Scope

- 1.1. The Standards of Behaviour and Conduct Policy (Policy) applies to Healius Limited, all its subsidiary companies (together, Healius Group (“Healius”)), and all directors, employees and contractors of Healius.
- 1.2. This Policy operates in conjunction with other relevant Healius policies as well as applicable Awards/Agreements and/or relevant legislation.
- 1.3. Healius may vary or rescind any policies or procedures from time to time in its absolute discretion and without any limitation on its capacity to do so.

2. Principles

- 2.1. Any person associated with, or in their dealings on behalf of Healius should always be treated with dignity and respect.
- 2.2. All people have the right to a work environment free from discrimination, harassment, sexual harassment, bullying, victimisation and adverse action.
- 2.3. We all have the responsibility to role model Healius standards of conduct and our values and that these should reflect the standards and expectations of the communities we serve.
- 2.4. We all have the responsibility to address work related behaviour and conduct that contravenes this policy, via the appropriate channel.
- 2.5. Where your behaviour or conduct doesn't meet the standards set out in this policy, we will address it directly with you under our Workplace Investigations Guidelines. These guidelines apply principles of procedural fairness.

3. Responsibilities

3.1. Executive Leadership Team (ELT)

Own the Standards of Behaviour and Conduct and are responsible for reviewing and maintaining the policy on a regular basis.

3.2. Managers Responsibilities

Responsible for;

- i. upholding the responsibilities of an 'Individual', along with ensuring you address poor conduct and behaviour, seeking support and assistance where required.
- ii. ensuring all education and training in relation to this policy is completed and you have a working knowledge of the supporting frameworks and procedures.
- iii. ensuring any decisions undertaken in relation to this policy, comply with the Healius's consequence management framework.
- iv. fostering a safe and comfortable work environment for all team members.

3.3. Individual Responsibilities

You are responsible for:

- i. your own behaviour and conduct;
- ii. being aware of and meeting the expectations of this policy and related Healius policies, values, procedures and where applicable relevant legislation;
- iii. treating customers, patients and colleagues with dignity and respect;
- iv. acting in the best interests of Healius and your colleagues;
- v. informing your Manager/HR/People & Culture in a timely manner if you think there may have been a breach of this policy.

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PART A Standards of Behaviour and Conduct

When undertaking duties on behalf of Healius you need to ensure that your actions are in accordance with the following standards of behaviour and conduct at all times.

This will help us to create a safe, open and trusting work environment, where all team members can bring their best and work to achieve their potential.

We ask that you follow these standards regardless of where you are undertaking these duties.

1. Our Values WE CARE

Our values underpin everything we do, what we stand for, how we work together and how we deliver to our customers, patients and partners.

- a) **W**ork it together; we collaborate and solve problems by working together.
- b) **E**mpathy for everyone; show respect for others through understanding their context.
- c) **C**ommitted to excellence; we strive for quality.
- d) **A**ct with integrity; we are open and transparent in our actions; we do what we say we will and we meet our commitments.
- e) **R**ecognise our people.
- f) **E**mbrace innovation.

2. Inclusion and diversity

We value and strive to build inclusive teams and workplaces, where sharing diverse ideas and the different experiences, of life, gender, background, age, tradition, education and professions are encouraged and celebrated.

We believe that we should reflect the composition of the communities we serve and strive to achieve this through our focus on inclusion and diversity.

We support these objectives through policies expressing these values and embedding procedures that deliver these outcomes.

3. Community and Social Expectations

We behave in accordance with the standards and expectations held by the communities we serve, this includes;

- a) treating all people, customers, patients, colleagues and partners with respect and courtesy. We are cooperative, helpful, we seek to understand and assist, communicate clearly and keep people informed about delays to services or response times.
- b) treating people in an equitable and consistent manner regardless of race, colour, sex, sexual orientation, gender identity, intersex status, age, physical or mental disability, marital status, family or carer's responsibilities, pregnancy, religion, political opinion, national extraction, social origin.
- c) having regard for the impact of Healius' activities on our physical environment and maintaining a focus on sustainability.
- d) maintaining a clean and tidy appearance at work, appropriate to your work environment and duties undertaken. Where there are uniform or dress policies in place, make sure they are adhered to.
- e) ensuring our work environments are free from smoking, illicit drugs and alcohol. This means that you can not be in possession of, seek to sell, use, distribute, or be under

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the influence of these substances at any time when undertaking duties on behalf of Healius, or when in attendance at one of our sites.

Some workplaces may have designated smoking areas, please ensure that you comply with the rules and that you exercise good hygiene practices to limit the exposure of others to smoking practices.

4. Working Safely (WHS)

We are committed to ensuring our people can come to work and conduct their responsibilities in a safe environment. We want to ensure that those attending our work environments are also safe while they do their work with us. Creating a safe environment to work in means;

- a) we consult and communicate with team members on matters relating to health and safety at work.
- b) all team members are aware of, understand and fulfil, their health and safety responsibilities.
- c) we regularly identify hazards and we know it takes everyone to keep our work environments safe. If you see something you think poses a risk at work, please report it to a Manager so that it can be actioned in a timely manner.
- d) we meet relevant health and safety legislation and other requirements placed upon us. Where this requires you to undertake specific activities, please follow instructions given by your Manager.
- e) we continually improve our work health and safety management system, to create and maintain a culture that values health and safety.

5. Professional and Ethical Standards

In carrying out your duties in connection with Healius, we encourage the highest standards of professional ethics.

We expect a common standard from our team members including;

5.1. Integrity

One of our fundamental values is to **Act with Integrity**. To achieve this, you should demonstrate;

- a) honesty openness and transparency, you speak up.
- b) trustworthiness and accountability, you are reliable, you do what you say you will.
- c) Responsibility, you follow the rules and own your mistakes.

5.2. Confidentiality

Treating confidential information in the correct manner is vitally important to protect our customers, patients, people and our business. You may have a work-related reason to access confidential information, if this is the case, you must ensure you handle it correctly.

Confidential information includes but is not limited to;

- a) Customers and Patients; personal, payment, health information of customers, patients, employees, whether it contains personal identifiers or not.
- b) Employees (team members); personal details, remuneration,

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- c) Legal advice obtained on behalf of Healius
- d) Communications with regulators or business partners.
- e) IT systems, network diagrams and configuration data.
- f) Information about Healius or its activities that has not been released to the public.
- g) Information marked confidential.

With respect to confidential information you may have access to throughout the course of your work with Healius, please ensure the following;

5.2.1 Protection and Security

- a) you need to maintain this information, electronically or physically in a secure manner.
- b) you must take all reasonable steps to restrict access to this information.
- c) if you become aware of a leak or breach of confidential information you must immediately notify your Manager.

5.2.2 Non-Disclosure

- a) you can't share or publish this information. This means you can't pass it on, disclose or distribute this information to any third parties, unless required by law.
- b) you must not disclose confidential information for any personal gain, including communicating non-public price sensitive information ("insider information") to another person or organisation for any purpose, including the trading in Healius' shares.

5.2.3 Insider Information and Trading

Insider information is information that is not publicly available. It is information you only know or have access to because of your role or work with Healius.

Because you may have insider information during your time at Healius, you are restricted on how and when you can trade in Healius shares.

You must not trade in Healius' securities at a time when you possess non-public information which, if disclosed publicly, would be likely to materially affect the market price of Healius' securities.

To avoid any doubt or confusion, information published by or available in the public domain that relates to Healius is not considered to be confidential information.

5.3. Performance of Duties

You are engaged by Healius to undertake duties on its behalf, when you're doing this, we ask that you;

- a) ensure that work is carried out conscientiously, efficiently and effectively.
- b) take care and be diligent when undertaking your duties, which also means doing so in an efficiency and competent manner.
- c) devote your time and energy to delivering on your commitments to Healius, this means not engaging in other activities when you are committed to be performing your duties. It also means that you won't engage in duties with another employer without the prior consent of Healius.

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- d) as a member of a profession, uphold the ethics and integrity of your profession and must be mindful not to act in conflict with Healius.
- e) where a conflict or potential conflict of interest arises, you must advise the Group Secretariat in a timely manner.
- f) ensure that you are familiar with and perform your duties in accordance with the relevant delegations of authority and levels of approvals that have been allocated for your role.

5.4. Representing Healius

When you perform your duties, and at other times with related activities, you are representing Healius, there is an expectation that you;

- a) role model our values of WE CARE.
- b) provide accurate information relating to your employment with Healius.
- c) never misuse any privilege, authority or status for personal, political or community interests without Healius' prior authorisation.
- d) do not engage in activities which would cause Healius public embarrassment or other damage, or which brings, or is likely to bring, Healius into disrepute.
- e) only use Healius's company name or logo with prior consent in a public domain, with prior consent.
- f) don't make public statements about Healius or any related entity, or your position in respect of any matter, without prior authorisation.

6. Healius Property

During the course of your duties, you will have access to and the use of Healius property, this includes physical property as well and other assets, we ask that you;

- a) only use Healius' property and/or information belonging to Healius, or opportunities arising from those, in the service of Healius and not for personal benefit or to benefit any other business or person
- b) not use your position for personal benefit or to benefit any other business or person
- c) take all reasonable steps to secure and ensure the protection of Healius assets, information, premises and resources. In particular, take necessary actions to minimise the possibility of theft, or unauthorised removal of Healius property by any person.
- d) not use Healius time, resources, facilities or the IT Environment for personal benefit or private purposes
- e) not use the Healius electronic communication facilities, equipment or the IT Environment (e.g. internet, e-mail, phone, iPad,):
 - i. for conducting unlawful or unethical activities or transmitting, accessing, storing, copying or otherwise being in possession of illegal, unethical, defamatory or offensive material, or material in breach of copyright or licensing conditions; and/or
 - ii. in a manner which causes interference or disruption to other network users, services, equipment and information assets including sharing of private passwords (see the Healius Group Information Technology Policy for further information),

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- iii. to access, store, process or transmit any information, material and or images of a threatening, obscene, pornographic, discriminatory or harassing nature
- iv. not use image or audio recording devices, such as cameras or mobile phones or digital or tape voice recorders, without written permission from the relevant department head, to capture and/or distribute images or audio recordings of:
 - a) private, confidential or copyrighted documents, conversations or other material;
 - b) Healius property or facilities that are not accessible to the general public;
 - c) any person without their express permission; or
 - d) any person, object, act or incident where the image would reasonably be considered inappropriate or offensive,
- v. damage Healius property, or property entrusted to the care of Healius

7. Misconduct

Misconduct is the broad description for behaviour or conduct which is deemed improper, unacceptable or inconsistent with Healius' standards set out in this policy. An overview of the types of behaviour that are not acceptable to Healius, include, but are not limited to;

- a) Any action or behaviour that is inconsistent with this policy may constitute misconduct.
- b) Any action or behaviour that breaches this policy may constitute misconduct.
- c) Mismanagement, or negligence in the course of your duties, may be considered misconduct.
- d) If misconduct is suggested, the circumstances will be reviewed in accordance with the Workplace Investigations Guidelines.
- e) failing to comply or refusing to carry out a lawful and/or reasonable instruction given to you by a Manager.

Genuine performance concerns or issues are not considered misconduct.

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Part B Laws and Regulations

In addition to setting standards for how we interact at Healius, there are several laws and regulations that place obligations on both Healius and individuals.

During the course of your employment with Healius, you must;

- a) meet all legislative or regulatory requirements which are applicable to your position.
- b) comply with all relevant laws and regulations, including local laws and regulations and when travelling interstate on company business.
- c) comply with all applicable laws and Healius policies relating to the use of all communications, information technology and electronic resources.
- d) not duplicate or use copyrighted material without authorisation in accordance with the law.

Unlawful Workplace Behaviour

Some behaviours which Healius considers unacceptable in connection with work, are also unlawful, they include, but are not limited to;

1. Discrimination
2. Harassment
3. Sexual Harassment
4. Bullying
5. Victimisation
6. Criminal Offences

Healius considers any behaviour or conduct which may constitute unlawful workplace behaviour to be extremely serious and will take appropriate action to these matters in accordance with the Workplace Investigations Guidelines.

1. Discrimination

It is unacceptable for any individual to experience discrimination while carrying their duties with Healius.

- a) Discrimination occurs when one person or group is treated less favourably than another because of protected attribute (“**protected attributes**”).
- b) Protected attributes are defined in anti-discrimination legislation (state and federal acts) and include;
 - i. race
 - ii. colour
 - iii. sex
 - iv. sexual orientation
 - v. age
 - vi. physical or mental disability
 - vii. marital status
 - viii. family or carer's responsibilities
 - ix. pregnancy
 - x. religion
 - xi. political opinion
 - xii. national extraction
 - xiii. social origin

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c) Types of Discrimination

	Definition	Actions that may constitute this type of Discrimination
Indirect	a condition or requirement has a negative impact on a person or persons because of a protected attribute.	a) Restricting access to promotion opportunities, to people who can work extended hours or weekends, making it difficult for people with carers responsibilities to be considered. b) setting physical requirements for job applicants that are not required by the job itself; height, lift capacity.
Direct	a person or persons are treated less favourably because of a protected attribute.	a) requiring a minimum or maximum age for job applications b) not awarding a promotion to a candidate, because she is pregnant c) excluding a team member from social activities because of an assumed belief they don't want to participate due to religious beliefs or cultural practices

2. Harassment

Healius maintains a work environment free from harassment to ensure you and your colleagues feel safe and comfortable at work.

- a) harassment is any behaviour that;
 - i. is unwelcome or unwanted; and
 - ii. may cause offence, intimidation or humiliation; and
 - iii. occurs in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated; and
 - iv. relates to a protected attribute under Discrimination law.
- b) actions that constitute harassment include, but are not limited to;
 - i. mimicking someone's accent, or the habits of someone with a disability or jokes based on race, sexuality, pregnancy, disability etc.
 - ii. verbal or written abuse or comments that degrade or stereotype people because of their race, sexuality, pregnancy, disability, etc.
 - iii. display or circulation (e.g. by email, text message or on social media) of racist, or other offensive material
 - iv. ignoring or isolating a person or group because of their race, sexuality, pregnancy, disability, or other protected attribute.
- c) harassment may take many forms; verbal, physical, written, pictorial and extends to your use of technology (e.g. internet, email, phone, fax, messaging applications and social media)
- d) harassment is usually a pattern of behaviour, but one act may constitute harassment.
- e) Healius will not accept any form of harassment undertaken in the work environment, or in any forum connected to the work environment or as a result of an individual's service with Healius.

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- f) behaviour that is not considered harassment includes, but is not limited to;
 - i. mutual friendships or relationships based on welcome behaviour
 - ii. personality conflicts
 - iii. reasonable managerial actions about employment related issues.

3. Sexual Harassment

Any form of harassment based on actual or perceived gender or sexual orientation will not be tolerated. Sexual harassment includes but is not limited to;

- a) unwanted physical contact or familiarity such as deliberately brushing against a person
- b) unwelcome comments about a person's physical appearance
- c) unwelcome questions about a person's relationship status, partner, or intimate relationships
- d) offensive or suggestive telephone calls and/or text messages and/or social media messages of a sexual nature
- e) displays of images that are sexual in nature
- f) pressure or demands for dates or sexual favours

Healius will not accept any form of sexual harassment in connection to the work environment or your employment with the Group. Potential breaches will be investigated in accordance with the Workplace Investigations guidelines, substantiated breaches may lead to termination of employment.

4. Bullying

- a) Bullying is **repeated, unreasonable behaviour** directed towards another individual, or group of individuals, that **creates or may create a risk to health and safety**.
- b) behaviour that may be considered bullying includes, but is not limited to;
 - i. persistent verbal or physical abuse,
 - ii. 'initiation' practices that involve humiliation, intimidation or abuse of colleagues,
 - iii. psychological abuse such as the exclusion or isolation of a colleague,
 - iv. deliberately and unreasonably withholding information necessary for effective work performance.
- c) Behaviour that is not considered to be bullying includes but is not limited to matters relating to;
 - i. hours and patterns of work
 - ii. allocation of work
 - iii. leave; and/or
 - iv. reasonable performance management actions
 - v. reasonable behaviour and conduct counselling or management actions
 - vi. reasonable disciplinary actions
 - vii. implementation of organisational change
 - viii. personality conflicts
- d) Healius will not accept any form of bullying or any form of occupational violence, undertaken in the workplace, or in any forum connected to the workplace or as a result of an individual's service with Healius

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5. Victimization

- a) Victimization occurs when an individual is disadvantaged as a result of;
 - i. making a complaint or an allegation, or
 - ii. being suspected of making a complaint or allegation, or
 - iii. being suspected of intending to make, a complaint or an allegation, or
 - iv. giving evidence or information in connection with a complaint or allegation (other than as a Respondent)
- b) Healius will not accept any form of victimization in the workplace, or in any forum connected to the workplace or as a result of an individual's service with Healius

6. Criminal Offences

Some forms of Harassment may also constitute criminal behaviour. For example, sexual assault, stalking, physically molesting a person and indecent exposure are criminal offences. If you become aware that a criminal offence has or may have been committed or attempted, you must contact your Manager or People/HR Representative immediately.

7. Serious Misconduct

Serious misconduct is conduct that is inconsistent with ongoing employment, it includes but is not limited to;

- a) causing serious and imminent risk to the health and safety of another person, by act or omission
- b) threatening or intimidating behaviour including verbal or written abuse, physical abuse or assault
- c) expressing or advocating for anti-social political, religious or discriminatory views in the work environment or in any connection to your role with Healius.
- d) causing serious and imminent risk to the reputation or profits of Healius, by act or omission
- e) engaging in unlawful conduct, including but not limited to theft, fraud, assault, unauthorised removal or appropriation of Healius property, property entrusted to the care of Healius.
- f) engaging in unlawful conduct, where the reputation of Healius may be brought into disrepute

8. Potential Breaches of this Policy

Where there is reason to believe that the standards outlined in this policy have been breached, failed to be upheld or conduct has occurred that is inconsistent with these standards this will be addressed in accordance with the Workplace Investigations Guidelines which may result in disciplinary action.

Other documents relevant to this Policy are:

- (a) WHS Policy;
- (b) Grievance and Investigation Guidelines;
- (c) Healius Group IT Acceptable Use Security Policy;
- (d) Healius Group Social Media Policy;
- (e) Any applicable Enterprise Agreement/Award;
- (f) Anti-bribery and anti-fraud Policy;
- (g) Gifts and Entertainment Policy;
- (h) Policy on Trading in Healius Securities by Directors and Key Management Personnel

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Definitions

- “Award/Agreement”** means an industrial instrument, such as an award, enterprise bargaining agreement or workplace agreement.
- “Behaviour”** your demeanour when interacting with others.
- “Bullying”** See Part B clause 4.
- “Company”** Healius Limited, all its subsidiary companies (together, the Healius Group), and all directors, employees, contractors of the Healius Group.
- “Conduct”** the manner in which you undertake the duties of your role, including how you apply yourself, diligence, interactions with others during the course of undertaking tasks associated with your role.
- “Discrimination”** See Part B clause 1.
- “Drugs”** means substances (including alcohol) or medications capable of causing dependency, alteration of mood or impaired judgment, concentration or coordination.
- “Employee”** means a person who has a contract of employment with Healius.
- “Contractor”** means a person who has a contract for services with Healius.
- “Harassment”** See Part B clause 2.
- “IT Environment”** means any facility, equipment, network, system (infrastructure or application) or device component that is used by the Healius Group in connection with information being created, accessed, processed, transmitted or stored by electronic means.
- “Manager”** means anyone who manages or supervises an Employee.
- “Misconduct”** description for behaviour or conduct which is deemed improper, unacceptable, breaches this policy, in part or wholly and/or is inconsistent with Healius’ standards set out in this policy.
- “Serious Misconduct”** See Part B clause 7.
- “Summary Dismissal”** refers to when the Company terminates an Employee’s employment immediately, without giving notice or any payment in lieu of notice.
- “Unacceptable”** means behaviour that does not meet the standards set out in this policy or is inconsistent with these standards.
- “Values”** means Healius Group’s core values of We Care.
- “Victimisation”** See Part B clause 5. **Error! Reference source not found.**
- “Work Environment”** means a premises owned or leased by Healius for the purposes of undertaking Healius business, and/or a premises where work is undertaken on behalf of Healius by one or more of its employees and/or contractors.

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