

Anti-bribery and Corruption Policy

What is the purpose of this policy?

BTC health Limited (ACN 091 979 172) (**BTC**) recognises the importance of transparency and accountability in its operations to promote best practice in corporate governance. It is committed to the highest standards of conduct and ethical behaviour in all business activities.

The purpose of this policy is to establish controls to ensure alignment with BTC's values, Code of Conduct and other policies. The Company is committed to complying with all applicable laws and regulations and acting in a manner that is consistent with the principles of honesty, integrity, fairness and respect. This policy forms part of, and is of integral importance to, the Company's risk management strategy and corporate governance framework. This policy is a practical tool for helping the Company to identify wrongdoing that may not be uncovered unless there is a safe and secure means for disclosing such conduct.

Scope

This policy applies to all directors, and all employees (whether permanent, fixed-term or temporary, including any secondees, contractor or consultant) of BTC and its subsidiaries (collectively 'employees').

We encourage any persons who are aware of possible wrongdoing with respect to the Company Group to have the confidence to speak up.

What is Bribery and Corruption?

Bribery is the offer, attempt, promise or giving any item of value that may influence, or appear to influence, a person's actions or decisions to gain or retain a business benefit. Bribery can take many forms including, the provision or acceptance of cash payments, facilitation payments, kickbacks, political and charitable contributions, social benefits, gifts, travel, hospitality and rebates or reimbursements.

Corruption is the abuse of entrusted power for private gain.

Obligations and responsibilities

Employees must not give, offer, promise, accept, request, authorise, assist or cover up any form of bribe, whether directly or indirectly. Employees have an obligation to report any incident which you reasonably believe involves bribery and or corrupt conduct. An Employee must not engage or participate in victimisation, bullying, harassment or any other action against a person who makes a report under this policy or is cleared of an allegation made under this policy.

Employees are required to ensure they are familiar with this policy and other related policies, such as the Code of Conduct, Whistleblower Policy and Delegations of Authority. BTC's Whistleblower Policy

affords employees certain protections against any detrimental treatment for making a report, even if they turn out to be mistaken.

Controls

Gifts, hospitality and entertainment

The offering or acceptance of gifts, entertainment or hospitality must meet the following conditions:

- it is done for genuine relationship building only;
- it cannot be construed as an attempt to unduly influence business or government decision making;
- it complies with legal restrictions in which the expenditure is made;
- it is done in an open and transparent manner; and
- it does not include cash, loans or cash equivalents (such as gift certificates or vouchers).

All gifts, entertainment or hospitality valued at \$100 or more must be approved by the Executive Chairman before the gift, entertainment or hospitality is accepted by the Employee.

The Executive Chairman must obtain approval from the Audit Committee Chair before any gift, entertainment or hospitality at \$100 or more is accepted.

Employees must declare all gifts and benefits valued at \$100 or more, in the Gift and Entertainment Register. The Gift and Entertainment Register is accessible via the Company Secretary.

If you are unsure about whether a gift, entertainment or hospitality is acceptable, contact the Company Secretary or Executive Chairman.

Political donations

Political donations shall not be made, whether in cash or kind, in support of any political parties or candidates, or to any political cause or election fund.

Charitable support and donations

Charitable support and donations are acceptable. However, employees must ensure charitable contributions are not be made for the purposes of gaining commercial advantage or concealing bribery. All charitable donations made must have prior approval of the Executive Chairman.

Reporting suspected issues or breaches

Employees are encouraged to raise concerns about any issue or suspicion of bribery and corruption at the earliest stage.

To report any issues or check whether a particular act might constitute bribery or corruption, contact the Company Secretary, Executive Chairman or the Chair of the Audit Committee.

Compliance with local laws, regulations and code of conduct

If any local laws, regulations, codes of conduct or orders where you are doing business impose additional obligations or are more restrictive than this policy, then you must comply with those additional obligations or restrictions in addition to complying with this policy.

Training and availability of this policy

All employees are required to understand and comply with this policy and follow the reporting requirements set out in this policy. Training on how to comply with this policy will be provided to new and existing employees.

A copy of this policy is available electronically on the BTC company server and is accessible to all employees.

Amendments to this policy

This policy and the procedures and processes underlying the policy will be reviewed periodically to ensure that they remain effective and meet both best practice standards and the needs of the Company.

Contact us

For further information and advice on this policy, contact the Company Secretary via queries@btchealth.com.au.