

# Values in Action

Our Code of Conduct



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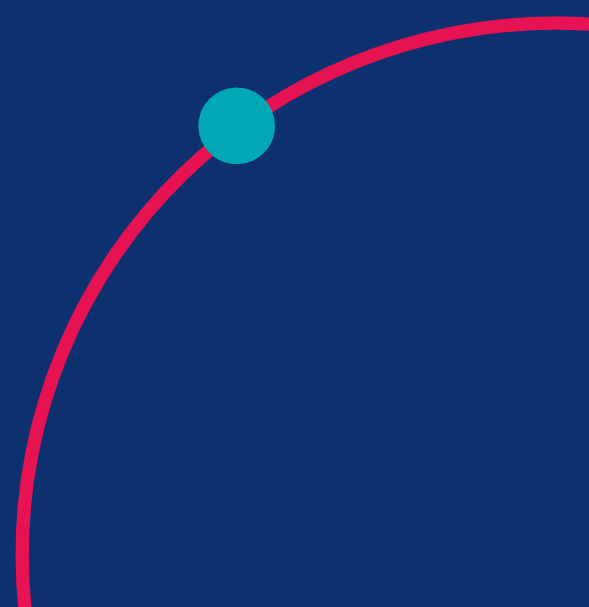
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## Acknowledgment of Country

The Healius Pathology Network acknowledges the Traditional Owners of Country throughout Australia and their enduring connections to land, waters and community. We pay our respects to Elders past and present.

In 2025, Healius commissioned Indigenous artist Jodie Herden to create an artwork that reflected our purpose and community connection. Gathering circles represent our centres across Australia, with the central form symbolising the Petri dish and our diagnostic work. Other elements depict our team and dedication to positive patient outcomes. This artwork is used across our business, reinforcing our ongoing commitment to cultural visibility, respect and partnership with First Nations peoples.

Artwork by Gomeroi Aboriginal Woman Jodie Herden.



A message from our CEO

# Our Values in Action

Every day, Healius Pathology Network provides the high-quality diagnostic services clinicians need to make confident decisions and support better health outcomes for communities across Australia.

**Achieving our purpose requires more than just clinical excellence; it demands the highest standard of ethical and professional conduct from every person who represents Healius.**

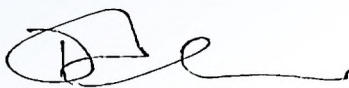
The **Healius Ways of Leading** underpin our **Values in Action** framework. This framework defines what we stand for as an organisation and the behaviours that bring our shared values to life. It sets out the principles we must uphold in every decision and interaction, regardless of our position at Healius.

I expect my leadership team to lead by example and I hold myself to the same high standards. Our decisions and actions shape our reputation and we are committed to fostering an inclusive, safe, and respectful workplace for all. This framework outlines the expectation for every employee to act consistently with our values and support others to do the same. Importantly, it empowers us to call out decisions or behaviours that do not align with those values. We have systems in place to support, protect and encourage employees to report any non-compliant, illegal or unethical conduct.

Through Values in Action, we strive to build a culture where every team member feels empowered to speak up, where we treat each other, our patients and our referrers with dignity, and where compliance is a shared responsibility.

Our goal is to promote a shared understanding of the principles that guide our behaviour and protect Healius' reputation for excellence in quality, safety, and service. I hope this inspires the same pride and commitment in you that it does for me. I am proud to lead an organisation that strives for the highest standards of ethical behaviour and is guided by strong values at its heart, to make life better for millions of Australians each year.

Yours sincerely,



**Paul Anderson**  
CHIEF EXECUTIVE OFFICER & MANAGING DIRECTOR  
HEALIUS LIMITED



## Values in Action

# The way we conduct ourselves

**Values in Action** outlines a set of commitments and expectations that apply to all directors, officers, employees, contractors, and temporary staff (**team members**) of Healius Limited and its related bodies corporate (together, the **Healius Pathology Network**) also referred to as Healius, we, our or us.

Our **Values in Action** establish the minimum standards of behaviour and ethical conduct expected of all team members to protect the integrity, reputation, and core values of Healius. We are committed to fostering a workplace culture where every team member feels safe, respected, valued and productive.

All team members must be aware of, and conduct themselves in a manner consistent with, our **Values in Action**.



# Core principles

## Dignity and respect

Every person associated with Healius, or acting on its behalf should be treated with dignity and respect. This commitment is the foundation of all our interactions and is central to our culture. We are dedicated to treating all our people, patients and customers with respect, courtesy, honesty and fairness, and with the proper regard for their rights, safety and wellbeing. We strive to make decisions that are fair, timely and transparent, while seeking to ensure compliance with all applicable laws, policies, and procedures.

## Laws and regulations

We are committed to meeting our obligations under applicable laws. As an organisation we are bound by this requirement and will provide reasonable education and assurance to support compliance.

### Our expectations of you:

- Seek to understand applicable legal requirements including laws and contractual obligations relevant to your role.
- Complete all training assigned to you.
- Ensure you are familiar with relevant policies, procedures, regulations, and agreements.

All people have the right to a work environment free from discrimination, harassment (including sexual harassment), bullying, victimisation and adverse action. Healius has zero tolerance for non-compliance with these expectations.

If a team member fails to comply with our Values in Action, a Healius policy or any legislative requirement they may face disciplinary action up to and including the termination of their employment or engagement with Healius.

## Diversity and inclusion

We are committed to creating inclusive teams and workplaces where everyone feels valued and respected. We encourage the sharing of diverse ideas and experiences across life stages, gender, cultural background, age and professional expertise, to reflect the composition of the communities we serve. Every team member plays a role in fostering a positive workplace by treating others with dignity and respect. Inappropriate, disrespectful or unlawful behaviour will not be tolerated.



# Our values

Our conduct must always be underpinned by our core values, demonstrated through the Healius Ways of Leading.



### Customer Focused

Create a better experience

- Understand real customer needs
- Keep it simple
- Make it easier



### Accountable

Own it

- Take responsibility, drive results
- Prioritise and act
- Embrace change – test, learn, adapt



### Collaborative

Win together

- Work effectively across teams and functions
- Share knowledge for better outcomes
- Support and trust each other



### Credible

Open and honest

- Use facts
- Do what you said you would
- Be constructive



### Resourceful

Make it work, make it better

- Be curious, find better solutions
- Adapt and deliver quickly
- Work smarter



## Values in Action

# Making sound decisions

By understanding and meeting the expectations laid out in this **Values in Action** framework, and complying with our legal obligations, we have a solid foundation upon which to make ethical decisions.

Making decisions at work can feel like a big responsibility. If you think a decision you are making, or something you have been asked to do, might be contrary to our Values in Action, it may help to ask yourself the following questions:

- Is it legal?
- Does it comply with our Ways of Leading?
- Is it fair?
- Does it feel right?
- How would other people in the organisation react?
- What would happen if everybody did this?
- Can I discuss this freely with my manager?
- How would it look if it was made public?

If you are uncomfortable with any of the answers to these questions, you should seek advice before acting. In the face of a dilemma, managers play an especially important role in making decisions and assisting others to determine the most appropriate course of action.

Please see the **Raising concerns** and **Speak up** sections of this document for further information about reporting conduct that does not reflect our Values in Action.

## Raising concerns

If you know or suspect that someone has behaved or is intending to behave in a way that is inconsistent with our Values in Action, you can raise genuinely held concerns through one of the channels below. Speaking up takes courage and integrity – qualities that are essential to maintaining our culture. By doing so, we can address issues proactively, prevent misconduct and minimise any negative impacts.

You can raise a complaint, concern, query or information regarding a breach of our Values in Action at any time. Reports can be made to:

- Your immediate manager.
- A senior manager.
- Your People & Culture representative.
- A member of the Legal team although please keep in mind they act for Healius.
- Pursuant to the Healius **Workplace Complaints & Grievances Policy**.
- Various channels detailed in the Healius **Whistleblower Policy** including Healius' Whistleblower Protection Officer at [wpo@healius.com.au](mailto:wpo@healius.com.au)

## Speak up

In some situations, you may feel that you are not able to raise concerns through standard channels, for example where you genuinely believe your manager may be potentially involved in improper conduct. In these circumstances, we encourage you to raise your concerns with another appropriate leader – for example, your manager's manager. Also, to support, protect and encourage employees to report non-compliant, illegal or unethical conduct, Healius has a **Whistleblower Policy** which includes the option of contacting an independently monitored service.

Under the **Whistleblower Policy**, an eligible team member or Contractor may consider disclosure through Healius' whistleblower channels which include:

- A Whistleblower Protection Officer.
- A senior manager, company secretary or director of any company in Healius.
- An auditor of any company in Healius.
- The external independent contact centre engaged by Healius to receive such disclosures, **Core Integrity**, whose details are available in the **Whistleblower Policy**.



## Leading by example

We trust our people to represent Healius and uphold our Values in Action.

### Our expectations of leaders and managers

We expect our leaders and managers to lead by example and support our people to live our Values in Action. This means you are expected to:

- Role model our Values in Action every day and take action to prevent or address any breaches of this framework or Healius policies.
- Ensure your team understands Healius' **Ways of Leading** and demonstrate these principles through your own leadership behaviours.
- Ensure team members understand their responsibilities under the Values in Action framework and complete all required training.
- Address inappropriate conduct or behaviour promptly and seek assistance or support when needed.
- Make decisions that align with Healius' policies, risk management requirements, safety standards and corporate frameworks.
- Foster a safe, inclusive and respectful workplace where people feel comfortable speaking up, suggesting improvements and raising concerns without fear of retaliation.

### Our expectations of all team members

We expect all our people to take responsibility for their behaviour and contribute to a positive and respectful workplace. This means that you are expected to:

- Take ownership of your conduct and always act with honesty and integrity.
- Read, understand and follow our Values in Action framework, related Healius policies and procedures, and all relevant laws and regulations.
- Treat customers, patients and colleagues with dignity and respect.
- Act in the best interests of Healius, comply with the law and cooperate with any investigations.
- Speak up and raise concerns if you believe a breach of our Values in Action may have occurred or will occur.

## Addressing concerns

We expect our leaders and managers to foster a culture where colleagues feel empowered to speak up if they have concerns. How you respond when a team member speaks up is critical to maintaining trust and integrity.

If team members or other colleagues have concerns, it is important that our managers:

- Make time to give the concern the appropriate level of attention.
- Aim to listen attentively, ask clarifying questions and avoid interrupting.
- Do not feel pressured to provide an immediate response or solution, but commit to following up, as appropriate.
- Ascertain whether the information shared is confidential.
- Recognise your team member for speaking up and acknowledge their courage.
- Seek the support you need while respecting the needs of those involved. Support may include your manager, the People & Culture team or a Healius Workplace Health and Safety representative.
- Be aware of and comply with Healius' WHS reporting procedures.



## Specific conduct guidelines

# Professional conduct and contributing to positive work environments

Healius is committed to a safe, open and trusting work environment where all team members can achieve their potential.



### Respect and courtesy

We behave in accordance with the standards and expectations held by the communities we serve. This requires:

- Treating all people, customers, patients, colleagues and stakeholders with respect and courtesy.
- Being cooperative, helpful, seeking to understand, communicating clearly and keeping people informed about delays or response times.
- Treating people in a reasonable, equitable and consistent manner.

### Smoking, alcohol and drugs

We are committed to maintaining safe and professional work environments that are free from smoking, vaping, illicit drugs and the misuse of alcohol.

#### Our expectations of you

- Not to be in possession of, seek to sell, use, distribute, be under the influence or test positive to illicit drugs or alcohol while undertaking duties or in attendance at a Healius site.
- Where designated smoking/vaping areas exist, comply with all rules and exercise good hygiene practices.
- Maintain a clean and tidy appearance, appropriate to your work environment and duties and adhere to all uniform or dress policies in place.
- Have due regard for the impact of Healius' activities on the physical environment.
- Adhere to Healius' **Drug & Alcohol Policy** at all times.



## Health and safety

We will consult and communicate with team members (and other relevant persons) on appropriate matters relating to health and safety at work.

### Our expectations of you

- Understand and fulfill your health and safety obligations. This includes being physically and mentally fit to perform your role safely and being mindful of the safety of others.
- Intervene when you observe unsafe behaviour by a colleague or customer, provided it is safe to do so.
- Promptly report any hazard or risk identified on our premises or in the course of your duties.
- Report all health and safety incidents that occur on Healius premises in the course of your duties (this includes while travelling for work purposes).
- Comply with all relevant health and safety laws and requirements, including following all lawful and reasonable managerial instructions regarding specific safety activities.

## Appropriate relationships

We are committed to fostering a respectful, trusted, and high-performing work and service environment. A key part of this commitment is ensuring that all team members understand expectations regarding workplace relationships and actively manage any actual or perceived conflicts of interest.

### Our expectations of you

- Maintain clear professional boundaries at all times, ensuring interactions with colleagues are appropriate and aligned with our values.
- Promptly disclose any close personal or family relationship that may give rise to an actual, potential or perceived conflict of interest – including situations that could impact reporting lines, influence decision-making and objectivity or create risks of bias or discrimination.



## Specific conduct guidelines

# Ethical obligations and business integrity

Healius is committed to a culture of corporate compliance and ethical behaviour.

## Laws and regulations

We are committed to ensuring team members meet all legislative and regulatory requirements applicable to their position, comply with all relevant laws and regulations (including local laws and when travelling interstate) and comply with all applicable laws and Healius policies relating to the use of all communications, IT and electronic resources.

## Bribery and corruption

Healius maintains a zero-tolerance policy towards bribery and corruption, regardless of your position, situation or association.

### Our expectations of you

- Do not give, offer, solicit or accept anything of value in exchange for influence or preferential treatment that would not otherwise be provided.
- Do not engage in dishonest, fraudulent or illegal conduct.
- Avoid conduct that is detrimental to any person or entity.
- Do not misuse your position to your own advantage or to benefit others improperly.
- Comply with the gift and entertainment boundaries outlined in this framework.
- Make payments for business purposes only.
- Make payments within the organisation approved limits (including under the **Delegation of Authority Policy**) and ensure written documentation is maintained.

## Gifts and entertainment

Team members should not seek or accept anything of value (gifts and entertainment) from any person who does business with Healius, except in accordance with the following provisions:

TYPE	VALUE (ANNUAL AGGREGATE)	APPROVAL REQUIREMENT	REGISTER REQUIRED
Modest	Up to and including \$100	Not usually required (if <b>General Principles</b> met)	No
Valuable	More than \$100	Group Executive for \$101–\$250; CEO Approval above \$250	Yes

### General Principles

Gifts and Entertainment must be nominal in value, offered as an act of appreciation or for legitimate business purposes and must not place obligations or create expectations on the recipient. Details of approved Valuable Gifts must be forwarded to the People & Culture team within 14-days of receipt or approval and recorded on the Register of Valuable Gifts and Entertainment.



## Unacceptable gifts

Any unacceptable gifts must be refused or immediately returned and reported to the relevant Group Executive. This includes:

- Any illegal gifts and entertainment.
- Cash or cash equivalents (loans, securities, options).
- Gift certificates valued at more than \$500.
- Gifts that are a 'quid pro quo' (offered for something in return).
- Gifts given so frequently that there could be a perception of impropriety.
- Gifts that are indecent, sexually oriented or would adversely impact Healius' reputation.

## Charitable donations

Healius proudly supports several charitable causes through donation matching and volunteering. All charitable donations made on behalf of Healius must be pre-approved in writing by the Chief Executive Officer or Chief Financial Officer. Donations given or received are not intended to exert improper influence.

## Political donations

Healius is committed to ensuring that any political donations made by or on its behalf are transparent and adhere to relevant laws. It is strictly prohibited to offer personal gifts, entertainment or bribes to bias a decision.

While Healius recognises its employees' right to make political donations in a personal capacity, team members must not make donations on behalf of Healius without the prior written approval of the Chief Executive Officer.

## Conflicts of interest

A conflict of interest occurs when there is a real, potential or perceived conflict or inconsistency between a team member's duties and their own personal interests, or between two or more of their duties to Healius.

The law and our **Trading in Securities Policy** in Healius Securities detail when you may trade in Healius securities (shares/options). You are also obliged to comply with Insider Trading laws which in the ordinary course prevent you from trading in the securities of other companies (such as our customers or suppliers) when you have 'insider information'. 'Insider information' means information not available to the public that is relevant to the price of the securities.

## Our expectations of you

- Team members must actively consider whether any real, potential or perceived conflict of interest arises.
- All conflicts of interest (and any changes in circumstances) must be declared and reported to the People & Culture team.
- The affected team member must consult with their line manager and the People & Culture team to determine and implement the most appropriate action for effectively resolving any actual, potential or perceived conflict of interest.

## Representing Healius

When performing your duties, and when participating in related activities, you are an ambassador of Healius.

## Our expectations of you

- Role model our values always.
- Provide accurate information relating to your employment.
- Never misuse any privilege, authority, information or status for personal, political or community interests without Healius' prior authorisation.
- Not engage in activities that would cause public embarrassment or other damage, or which brings, or is likely to bring, Healius into disrepute.
- Only use the Healius company name or logo with prior consent in a public domain.
- Not make public statements about Healius, any related entity, or your position on any matter, without prior authorisation from the Group Executive.

## Performance of duties

## Our expectations of you

- Ensure that your work is conducted conscientiously, efficiently and effectively.
- Be diligent and operate in a competent manner.
- Devote your time and energy to delivering on your commitments and do not engage in any conflicting activities or employment without Healius' prior consent.
- If you are a member of a profession, uphold the ethics and integrity of that profession and ensure they do not conflict with your duties to Healius.
- Be familiar with and adhere to the **Delegation of Authority Policy** and levels of approvals allocated for your role.
- Ensure your actions align with our ethical and compliance standards and policies.

## Specific conduct guidelines

# Misconduct and unlawful behaviour

Healius will take appropriate action against any behaviour that may constitute unlawful workplace behaviour or misconduct.



## Unlawful workplace behaviour

We are committed to providing a safe and respectful workplace where unacceptable behaviours will not be tolerated. These behaviours are not acceptable and Healius takes these matters very seriously, including:

- Unlawful discrimination, either direct or indirect, including such related to protected attributes (including race, colour, sex, sexual orientation, gender identity, intersex status, age, physical or mental disability, marital or relationship status, family or carer's responsibilities, pregnancy/breastfeeding, religion, political opinion, national extraction, social origin etc).
- Harassment or bullying including unwelcome/uninvited behaviour that a reasonable person, having regard to all the circumstances, would have anticipated would humiliate, offend or intimidate the person exposed to the conduct.
- Sexual harassment including unwelcome sexual advances, requests for sexual favours, unnecessary familiarity or other conduct of a sexual nature.
- Victimization including the disadvantaging of an individual because of them making, intending to make, or being involved in a complaint or allegation.

All employees must comply with Healius policies that prevent and address harassment and discrimination.



## Misconduct and serious misconduct

**Misconduct** is the broad description for improper, unacceptable behaviour, or behaviour inconsistent with our Values in Action. Examples include:

- Any action or behaviour that breaches this framework.
- Failing to comply with or refusing to conduct a lawful and/or reasonable instruction given by a manager.
- Mismanagement or negligence in the course of your duties.

**Serious misconduct** is conduct inconsistent with ongoing employment, including (but not limited to):

- Causing serious and imminent risk to the health and safety of another person.
- Threatening or intimidating behaviour, including verbal abuse, physical abuse or assault.
- Causing serious and imminent risk to the reputation or profits of Healius.
- Engaging in unlawful conduct such as theft, fraud, assault or unauthorised removal of property.

## Laws and regulations

### Our expectations of you

- Meet all legislative and regulatory requirements applicable to your position and comply with all relevant laws and regulations (including local laws and when travelling).
- Comply with all Healius policies relating to professional conduct and the use of IT and electronic resources.
- Complete mandatory training when required.



## Specific conduct guidelines

# Protecting information and assets

Healius is committed to protecting its assets and data privacy across its operations.

## Confidentiality

You may have a work-related reason to access confidential information. Treating confidential information correctly is vital to protect our customers, patients, people and business. Confidential information includes (but is not limited to):

- Customers' and Patients' personal, payment, or health information (whether personal identifiers are present or not).
- Employees' personal details.
- Legal advice obtained on behalf of Healius.
- Communications with regulators or business partners.
- IT systems, network diagrams, and configuration data.
- Information about Healius or its activities that has not been released to the public.

## Protection and non-disclosure

### Our expectations of you

- Keep this information confidential and maintain it (electronically or physically) in a secure manner and take all reasonable steps to restrict access.
- Only use this information for the purposes of performing your duties.
- Do not use, share, publish, disclose or distribute this information to any third parties, unless required by law or with appropriate authorisation.
- Immediately notify your manager if you suspect or become aware of a leak or breach of confidential information.
- Complete mandatory Information Security and Data Privacy training when required.





## Use of company resources

Healius property includes physical assets, information, time and the IT environment. We are committed to using company property and resources for the sole purpose of conducting the business of the organisation, and not for any form of personal gain or non-authorized use.

### Our expectations of you

- Use Healius' property and information in a respectful and professional way and only in the service of Healius.
- Take all reasonable steps to secure and ensure the protection of Healius assets, information, premises and resources (minimise theft or unauthorised removal).
- You must not use image or audio recording devices (e.g., cameras, phones, recorders) without written permission from the relevant department head, to capture and/or distribute:
  - Private, confidential, or copyrighted documents/conversations.
  - Healius property or facilities not accessible to the general public.
  - Any person without their express permission.
  - Any person, object, act, or incident where the image would be considered inappropriate or offensive.
- Not damage Healius property or property entrusted to the care of Healius.
- Not use the Healius electronic communication facilities, equipment or the IT environment (e.g., internet, email, phone) to:
  - Conduct inappropriate, unlawful or unethical activities, or transmit/store illegal, unethical, defamatory or offensive material.
  - Cause interference or disruption to other users, services, systems or equipment (including sharing private passwords or unauthorised access to or deletion of Healius materials).
  - Access, store, process or transmit information or images of a threatening, obscene, pornographic, discriminatory or harassing nature.
- Limit personal use of social media during work hours unless it directly relates to your role or responsibilities (e.g. campaigns managed by the Healius Marketing team). When accessing social media on Healius devices, be aware that usage may be logged, monitored and restricted, and inappropriate sites will be blocked. All social media activity must comply with Healius policies, remain respectful, accurate and lawful.
- Comply with all relevant policies, legislation or regulations when using IT systems, services or equipment.





# Reporting and consequences

## Reporting breaches

Team members have a responsibility to report work-related behaviour that contravenes our Values in Action. You must inform your manager or People & Culture team in a timely manner if you think there may have been a breach.

## Consequences of breach

A breach of this framework will be considered and addressed appropriately. Depending on the nature and circumstances of the breach, Healius may take disciplinary action up to and including termination of employment or the applicable engagement. All misconduct matters are reviewed in accordance with Healius' **Workplace Complaints and Grievances Policy** which applies the principles of procedural fairness.



# Supporting policies and further resources

Supporting the commitments and expectations outlined in this Values in Action Code of Conduct is a comprehensive suite of organisational policies. Team members are responsible for familiarising themselves with the suite of policies, and in particular the following policies, which are directly connected to Values in Action and available on our employee intranet.

- **Drug & Alcohol Policy**
- **Delegation of Authority Policy**
- **Uniform Policy**
- **Workplace Complaints & Grievances Policy**
- **Work Health, Safety & Wellbeing Policy**
- **Bullying, Harassment, Sexual Harassment & Discrimination Policy**
- **Diversity, Equity, Inclusion Belonging Policy**
- **Disclosure & Communications Policy**
- **Trading in Securities Policy**
- **IT Acceptable Use Policy**
- **Surveillance Policy**
- **Social Media Standard**
- **Whistleblowing Policy**
- **Environment Policy**

## Policy governance

Healius' Values in Action Code of Conduct will be reviewed by the Board on an annual basis.

### **Version: 1**

Date: 24/03/2026

Approver: Board

Internal/External Publication: 31/03/2026

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