

	Regis Anti-Bribery and Corruption Policy	Version: 3 Date: 16 February 2026 Page: 1 of 10
Next review due by: November 2027		
Developed by: Legal		
Authorised by: Audit, Risk and Compliance Committee		Issued To: Regis Executive Team and all Responsible Persons

PURPOSE

Regis Healthcare Limited (**Regis**) is committed to a high level of integrity and ethical standards in all of its business practices. As part of this commitment, Regis has zero tolerance for Bribery and Corruption.

Regis acknowledges the serious criminal and civil penalties that may be incurred and the reputational damage that may be done if the organisation is involved in bribery or corruption. Regis may be held liable for bribery or corruption undertaken by Workers or third parties where adequate prevention procedures are not maintained. Accordingly, Regis is committed to implementing and continuously improving proportionate procedures to prevent bribery and corruption.

The purpose of this Anti-Bribery and Corruption Policy (**Policy**) is to set clear standards for how all Workers should behave, to prevent Bribery and Corruption in Regis' business practices, and provide information and guidance to Workers on how to recognise and deal with bribery and corruption issues. The conduct required under this Policy aligns with the Code of Conduct which explains Regis' values and the expectations Regis has of its Workers, particularly the core values of Integrity and Respect.

The Anti-Bribery and Corruption Policy is a key element of Regis' Corporate Governance program. A copy of this Policy will be available on the Regis website and the Intranet.

PEOPLE THIS POLICY APPLIES TO

This policy applies to all Regis directors and people performing work for a Regis group entity (Workers) as:

- Direct employees employed via an employment contract with a Regis Group entity; or
- Indirect employees such as an agency worker, contractor, sub-contractor, student, trainee or unpaid volunteer, suppliers and other associated providers, in a Regis Group entity workplace.

In certain circumstances the obligations set out in this Policy may extend to a Worker's Connected Persons.

Workers should be guided by this Policy and the Regis Gift Policy to determine whether the acceptance or offering of a Gift could constitute a Bribe.

This policy is not limited to the workplace or work hours. This policy extends to all functions and work related activities, which include work lunches, conferences, Christmas parties and other functions or dealings that may be associated with Regis' business or reputation.

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RESPONSIBILITIES

BOARD	<p>The Board has delegated to the Audit, Risk and Compliance Committee with responsibility for:</p> <ul style="list-style-type: none"> a. approving this Policy and any material amendments; b. ensuring that appropriate systems, policies and controls are in place to prevent bribery and corruption in the delivery of aged care services. c. overseeing the effectiveness of Regis' anti-bribery and corruption framework; d. receiving regular reports on material bribery and corruption risks, incidents and remediation; and e. fostering a culture of integrity, ethical conduct and compliance.
CEO	<p>has responsibility for:</p> <ul style="list-style-type: none"> a. minimising the risk of Bribery and Corruption in Regis' business practices by driving a corporate culture aligned with the Code of Conduct, particularly core values of Integrity and Respect; and b. determining corrective action in relation to breaches of the policy.
Company Secretary	<p>has responsibility for:</p> <ul style="list-style-type: none"> a. supporting Worker assessments of the reasonableness of gifts and payments; and b. advising Workers on the legality of particular business practices; and c. conducting investigations into reports that the policy has been or may have been breached by a Worker. The Company Secretary may delegate the conduct of the investigation to another Worker but will remain responsible for the proper oversight of the investigation.
Management	<p>has responsibility for:</p> <ul style="list-style-type: none"> a. adhering to this policy and leading by example; b. ensuring this policy is communicated to all Workers; c. ensuring this policy is complied with by all Workers;



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	<p>and</p> <p>d. ensuring the protection and welfare of any Worker who notifies a breach or suspected breach under this policy.</p>
All Workers	<p>have responsibility for:</p> <p>a. adhering to this policy; and</p> <p>b. notifying Management of any breaches or suspected breaches of the policy.</p>

 <p style="text-align: center;">Regis Anti-Bribery and Corruption Policy</p>	<p>Version: 3 Date: 16 February 2026</p>
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POLICY

Bribes

Workers may not:

- a) authorise, offer, promise or give a bribe, whether directly or indirectly, to anyone; or
- b) accept, receive, solicit, request, demand, authorise or agree to accept or receive or take a Bribe from anyone,

whether in the course of their employment or in any dealings that may be associated with Regis' business.

Gifts

It is recognised that Gifts may be offered for building legitimate business relationships and other legitimate business purposes. Gifts may pose a risk as they may compromise or have the appearance of compromising a Worker's objectivity and exercise of business judgment in the best interests of Regis.

Gifts must never:

- a) be given or received with the intent to influence a decision;
- b) be offered to Public Officials without prior written approval;
- c) be provided in cash or cash equivalents; or
- d) create a perception of impropriety.

Workers must follow the rules and procedures set out in the Regis Gift Policy before accepting a Gift.

Facilitation Payments

Facilitation Payments are prohibited.

Corrupt Business

Workers must not, directly or indirectly, authorise, undertake or participate in any form of Corrupt Business practice (such as a scheme that gives any improper benefit, kick-back or secret commission to anyone) whether for their own benefit, the benefit of Connected Persons or the benefit of Regis.

Charitable Contributions

Genuine charitable support and donations may be acceptable in the form of in-kind services, knowledge, time, or direct financial contributions. However, Workers must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery and are made in accordance with a Workers employment obligations, this Policy and the Regis Gift Policy.

Regis should ordinarily only make charitable donations to an organisation that has a deductible gift recipient status with the Australian Taxation Office. This status makes the organisation entitled to receive income tax deductible gifts and deductible contributions.

No donation may be offered or made on behalf of Regis without the prior approval of the CEO.

Financial Records

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All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments. It is an offence under the *Crimes Legislation Amendment (Proceeds of Crime and Other Measures) Act 2016* for a person to make, alter, destroy or conceal an accounting document (including being reckless in their conduct which allowed such an act) to facilitate, conceal or disguise the corrupt conduct.

Money Laundering

Workers must not, directly or indirectly, authorise, undertake or participate in any form of money laundering which involves:

receiving money that it would be reasonable to believe is the proceeds of crime; and
dealing with that money to conceal the illicit nature of the source of the funds.

Cash

Workers must not receive cash payments for any services. Where cash is offered as payment, Workers should direct the person making the offer to Accounts Receivable.

Company Cards

Workers must only use company cards for purposes that are in direct connection with, or as a direct consequence of, the card holder's functions and duties at Regis. All Workers who hold company cards are required to follow the rules and procedures set out in Regis' Corporate Card Policy.

Gift Cards

Gift cards are Gifts for the purposes of Regis' Gift Policy. Workers must follow the rules and procedures set out in Regis' Gift Policy when they receive Gift Cards. Additionally, gift cards should not be used as payment for services provided or received by Regis.

INDICATORS OF BRIBERY & CORRUPTION

Workers should report suspicious behaviour to their Executive General Manager in accordance with the CONSEQUENCES OF BREACH section of this policy.

Examples of In-Home Risks

- A key risk of bribery and/or corruption in our Homes is the receipt of Gifts, cash, payments or gift cards from residents or families for the provision of special treatment to a particular resident. Ensure all Gifts, cash, payments or gift cards are disclosed and approved in accordance with the Gift Policy.

Examples of Commercial Risks

- Indicators of bribery and/or corruption in commercial dealings include, but are not limited to:
 - requests for tenders that include specifications that favour particular suppliers;

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- requests for tenders that are entirely organised and run by one individual; personal connections with bidders for contracts (e.g., family members or friends that are bidders);
- sensitive information being released to contract bidders; and
- contracts that are continuously extended without consideration of whether Regis is satisfied with the providers' performance.

IDENTIFICATION, MITIGATION AND MANAGEMENT

Bribery and Corruption risks are identified and mitigated in several ways, including through the conduct of regular risk assessments, internal and external audits and on-boarding and due diligence procedures.

Workers are also required to identify and escalate Bribery and Corruption risks arising during their roles, in accordance with this Policy.

Regis will conduct bribery and corruption risk assessments at least every two years and upon:

- changes in business model or ownership;
- significant third-party engagements; or
- merger, acquisition or divestment activity.

Risk assessments will inform proportionate controls, training and monitoring.

Management and Regis' internal audit program will monitor the implementation of this Policy.

TRAINING

Regis will provide periodic anti-bribery and corruption training that is proportionate to a Worker's role, risk exposure and seniority.

Targeted training will be provided to:

- senior executives and Directors;
- managers;
- procurement and contracting roles; and
- Workers interacting with Public Officials.

THIRD PARTY DUE DILIGENCE

Regis has zero tolerance for bribery and corruption and may communicate this with third party suppliers and

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include this in the terms of Regis' Supply of Goods Agreement and Supply of Services Agreement.

Regis will apply risk-based due diligence to third parties, including suppliers, contractors, consultants, agents and associated providers.

Due diligence may include:

- assessment of ownership, reputation and integrity;
- consideration of corruption risk by jurisdiction;
- contractual anti-bribery warranties and audit rights; and
- ongoing monitoring for higher-risk relationships.

CONSEQUENCES OF BREACH

Where a Worker becomes aware of a breach, an allegation of breach, or suspects a breach of this Policy, the Worker must immediately report the breach to their Executive General Manager (or in the case of a Director, the Chair), or if the breach involves their Executive General Manager, the Company Secretary.

Investigations into reported breaches will be carried out by the Company Secretary or his/her delegate.

A breach of this Policy is considered to be a breach of Regis' Code of Conduct (**the Code**). The consequences of such a breach will depend upon the severity of the breach and are set out in the Code, but may include:

a formal warning;

termination of employment; and/or

referral to State or Federal Police or regulators, such as the Australian Securities and Investments Commission.

Improper payments, inducements or benefits relating to the provision of funded aged care may constitute a misuse of Commonwealth funding and expose Regis and its responsible persons to regulatory action.

WHISTLEBLOWER

Regis operates a whistleblower system in accordance with the Aged Care Act 2024 and Aged Care Rules 2025. Reports of bribery or corruption may be made anonymously to any aged care worker and will be handled in accordance with statutory whistleblower protections.

Regis encourages disclosure pursuant to its Whistleblower Protection Policy and, to the extent possible, will support and maintain the confidentiality of persons who raises concerns of bribery and/or corruption in good faith, even if the concerns are subsequently unsubstantiated.

Furthermore, Regis will take all reasonable steps to protect any Worker who raises legitimate concerns in good faith from adverse consequences. Regis prohibits retaliation against any person who reports bribery or

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corruption concerns in good faith.

REPORTING TO THE AUDIT RISK AND COMPLIANCE COMMITTEE

The Company Secretary will report to the Audit Risk and Compliance Committee not less than every six months, summarising activities under this Policy.

Any substantiated material breaches of this policy, as determined by the Company Secretary or the relevant Executive General Manager, will be reported to the Chair of the Board, Chair of the Audit, Risk and Compliance Committee and the MD/CEO without delay and to the next meeting of the Audit Risk and Compliance Committee.

REVIEW OF POLICY

The policy will be reviewed every two years.

DEFINITIONS

Bribe	is an inducement or reward offered, promised or provided with the intention of influencing a person to do or omit to do anything in the performance of their role or function, in order to obtain business or an advantage that is not legitimately due. Bribes may be durable or consumable, and may include one or more of the following, non-exhaustive examples: <ul style="list-style-type: none"> • payments; • Gifts; • discounts; • benefits and 'perks' to relatives including employment, education and training; • unwarranted allowances or expenses; • Kickbacks or Secret Commissions; • Facilitation Payments; • donation to a Regis fundraiser, political or charitable donations; and • community outreach and stakeholder engagement expenses.
Bribery¹	is the act of offering, promising, giving or accepting a Bribe

¹ As defined by Transparency International.



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Chair	means the Chair of the Regis Healthcare Limited board of directors.
CEO	means the Chief Executive Officer of Regis Healthcare Ltd. In the event that a disclosure is in relation to the actions of the CEO, this policy should be read as if references to the CEO are to the Chair.
Company Secretary	means the Company Secretary of Regis Healthcare Ltd. In the event that a disclosure is in relation to the actions of the Company Secretary, this policy should be read as if references to the Company Secretary are to the Chief People Officer.
Connected Person	means a spouse, partner, child, step-child, parent, grandparent, grandchild, sibling or step-sibling of the Worker or of the Worker's spouse or partner.
Corrupt Business	means dishonest activity in which a Worker acts contrary to the interests of Regis and abuses his/her position of trust in order to achieve some personal gain or advantage for him or herself or for another person or entity or Regis.
Facilitation Payment	means a minor payment or other inducement provided to a Public Official in order to secure or expedite a routine government action which the Public Official is already ordinarily obliged to perform.
Gift	means the free provision of a good or service in association with Regis' business that holds objective material value or confers some benefit either to the recipient or their Connected Persons, or Regis. Gifts may be durable or consumable and may include things such as a meal, discounts, tickets or invitations to a sporting, entertainment or cultural event, a gift voucher, a donation to a Regis fundraiser, political or charitable donation, or other tokens of appreciation.
Kick-Back/Secret Commission	means an undisclosed payment (or something of value) that is offered or provided to an agent or representative of a person or company in order to influence the conduct of the business of the principal.
Worker	means any current and former worker or employee of Regis and includes Directors, direct employees employed via an employment contract with a Regis Group entity; or indirect employee such as an agency worker, contractor, sub-contractor, student, trainee or unpaid volunteer, suppliers and other associated providers, in a Regis Group entity workplace.

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KEY LEGISLATION, ACTS AND REFERENCES

ASX Corporate Governance Principles and Recommendations, 4th Edition

LINK TO RELATED POLICIES AND PROCESSES

This policy should be read in conjunction with the Regis Gift Policy, the Regis Code of Conduct, the Regis Whistleblower Protection Policy and Regis' Corporate Card Policy.

VERSION HISTORY / AUTHOR / CONTRIBUTORS

Version	Date Created	Sections Changed	Created/Amended by
V2	2/2023	<ul style="list-style-type: none"> Responsibilities Policy Indicators of Bribery and Corruption added Identification, Mitigation & Management Training Third Party Due Diligence Consequences of Breach Whistleblower 	Legal Team
V3	2/2026	<ul style="list-style-type: none"> Purpose Employees Policy Applies to Responsibilities Policy – Gifts Identification, Mitigation and Management Training Third Party Due diligence Consequences of Breach Whistleblower 	Legal Team

