BRIBERY, CORRUPTION AND FRAUD POLICY

1. INTRODUCTION

Genetic Signatures values its reputation as an honest, law-abiding corporate citizen that will compete for business based on the merits of its product offering wherever any one of the Group companies may operate. GSL is committed to doing so without the use of bribery or unfair business practices. This Policy has been developed in conjunction with Genetic Signatures' Code of Conduct and reflects our values to ensure that Genetic Signatures and its Employees observe the highest standards of fair dealing, honesty and integrity.

2. WHO DOES THIS POLICY APPLY TO?

The Board of Directors of Genetic Signatures Limited has adopted this Anti-Bribery Policy. The Policy applies to all directors, the senior executive team, officers and employees, contractors and consultants of all entities within the Genetic Signatures group of companies ("Employees"). This policy applies to related entities within Genetic Signatures, as applicable and subject to the entity complying with its regulatory and licensing obligations.

3. WHAT IS BRIBERY, CORRUPTION AND FRAUD?

Bribery is the offering, promising, giving, soliciting or accepting an inducement such as a payment or provision of a benefit which is not legitimately due, to influence the performance of a person's duty and/or to encourage misuse of his or her authority. Bribery requires intention and conduct and can take the form of gifts, rewards and other favours.

Similarly, a person who does not personally provide or offer a benefit, but instead procures someone else to do so on his or her behalf, is likely to be found to have aided, abetted, counselled or procured a bribe.

Corruption is the dishonest or fraudulent conduct by those entrusted with power for personal gain.

It can include foreign and domestic bribery, destruction, removal or inappropriate use or disclosure of records, data, materials, intellectual property or assets, or any similar or related inappropriate conduct.

Examples of corrupt conduct include, but are not limited to:

- a person improperly using, or trying to improperly use, the knowledge, power or resources of their position for personal gain or the advantage of others
- disclosing private, confidential or proprietary information to outside parties without implied or expressed consent
- accepting or seeking anything of material value.

Fraud is dishonestly obtaining a benefit, or causing a loss, by deception or other means.

Examples of fraud and dishonesty may include, but are not limited to:

- knowingly providing false, incomplete or misleading information for unfair, unjustified or unlawful gain
- unauthorised possession, use or misappropriation of funds or assets including for example embezzlement and misappropriation
- tax evasion
- payroll theft via the processing system or through dishonest leave practices
- forgery or alteration of any document or record
- identity fraud, in which someone wrongfully obtains and uses another person's personal data for personal gain, including by making unauthorised purchases or selling someone's information to a third party.

4. BRIBERY AND CORRUPTION LAWS AND ENFORCEMENT

Bribery is a criminal offence and penalties can be severe for both Genetic Signatures and individual employees. Acts of bribery may result in prosecution at home or in other jurisdictions.

Most countries where Genetic Signatures operates have laws prohibiting bribery and corruption, including Australia (*Criminal Code Act 1995*), United States of America (*Foreign Corrupt Practices Act 1977*) and United Kingdom (*Bribery Act 2010)*.

An Employee who offers or accepts a bribe is in breach of the Genetic Signatures Anti-Bribery & Corruption Policy. A breach of applicable law and/or this policy will be regarded by Genetic Signatures as serious misconduct which may lead to disciplinary action, including termination.

Genetic Signatures may also report any serious misconduct to relevant authorities, including law enforcement authorities.

5. IDENTIFIED RISK AREAS

5.1 GIFTS, ENTERTAINMENT AND HOSPITALITY

Gifts, entertainment and hospitality comprise payments (even those of potentially nominal value) or gestures provided to third parties of Genetic Signatures or received by Genetic Signatures Employees in the course of conducting Genetic Signatures' business.

These do not constitute a bribe provided the activity complies with all legislative requirements, and they are transparent, culturally appropriate and incapable of being considered an inducement to act dishonestly or in breach of any duty. This Policy allows for reasonable and appropriate gifts, entertainment and hospitality to be offered or received for the purposes of:

- establishing or maintaining good business relationships;
- improving or maintaining Genetic Signatures' image or reputation; or
- marketing or presenting Genetic Signatures' products and/or services effectively.

Employees should apply the following guidelines to help determine what is an acceptable gift, entertainment or hospitality activity.

- What is the intent or purpose of the gift or activity? Is it to influence a third party to gain or retain business advantage, to reward that advantage?
- What is the appearance of the activity? Could the act of giving the gift or providing the entertainment or hospitality be construed as being for an improper purpose even if it is lawful, reasonable and for a proper purpose. Consider how it could be reported in the media.
- Cash or gift cards are never appropriate.
- Often small gifts are offered by suppliers, or gifted to existing customers as a token of appreciation or thanks for assistance, such as a Christmas hamper. Before accepting or giving such gifts consider if this is intended to, or may look like, creating an obligation to the giver or receiver. If in doubt don't accept it.
- If unsure, seek approval from CEO, CFO or another senior manager.

For avoidance of doubt, any gift or offer of hospitality with a value greater than $250 (AUD, USD, GBP or EUR, depending on the jurisdiction) must be pre-approved by CEO, CFO or a Director.

5.2 DONATIONS

Donations to political parties are not general practice for Genetic Signatures. Any donation of this nature may only be done with the prior approval of the Genetic Signatures Board of Directors and must be for a proper purpose.

Charitable donations on behalf of Genetic Signatures of a small value require pre-approval by CEO. Larger value charitable donations (>$1,000) will be escalated to the Audit & Risk Committee for approval. These donations must be in accordance with local laws and customs.

6. RESPONSIBILITIES

The company takes a zero-tolerance approach to all form of bribery, corruption and fraud, and is strongly committed to delivering accountability and transparency to all clients and stakeholders.

The company also understands general obligations with respect to bribery, corruption and fraud and is committed to ensuring compliance with relevant legislative and regulatory requirements, including that it protects people who disclose such unlawful behaviour from victimisation.

It is the responsibility of all those working for us, whether as employees, directors, officers, consultants, representatives, secondees, contractors, volunteers or similar to comply with the following:

- Help detect, prevent and report instances of bribery, corruption, fraud and any other wrongdoing.
- Must not authorise, offer, promise or give a bribe to anyone in the public or private sector.
- Must not demand, request, receive, accept, solicit or take a bribe from anyone in the public or private sector, which can include gifts, hospitality and gratuities from third parties such as suppliers or customers.
- Must not misuse funds or other property of the company or that of its clients (such as but not limited to intellectual property, confidential information and information of third parties).
- Must comply with all relevant policies.

- Avoid any activity that might lead to, or suggest, a breach of this policy.
- If in a situation where their employment duties or responsibilities conflict or may conflict with their personal interests, the conflict must be disclosed.

Any person that breaches this policy will face disciplinary action, which could result in termination of employment or contractual relationships for gross misconduct.

7. HOW TO RAISE A CONCERN

To the maximum extent practicable, a person who genuinely discloses an allegation or concern about bribery, corruption or fraud in breach of this policy, a law or other standard of behaviour ("Whistleblower") will be protected from any adverse action for having raised such allegations or concerns, even where they prove to be unsubstantiated or incorrect. Except that, a person who maliciously or vexatiously makes a disclosure or false allegations may be subject to disciplinary action.

This protection also applies to employees who participate or assist in an investigation concerning bribery, corruption or fraud.

Reasonable grounds
Before making a disclosure, you must have reasonable grounds to suspect the relevant conduct has occurred or is happening.

Accordingly, all disclosures should provide specific, adequate and pertinent information with respect to, among other things, dates, places, persons, witnesses and the like, to enable a reasonable investigation to be conducted.

However, whistleblowing does not give you immunity from disciplinary or legal actions if found guilty of the same or similar misconduct.

Workplace policy

For your own benefit, it is important that you do not 'blow the whistle' on any conduct before understanding your rights and obligations as a Whistleblower. You may not be protected by law if your allegation or concerns are not about reportable conduct that is protected.

Accordingly, you are encouraged to speak with an authorised Whistleblower Protection Officer, a senior manager, director or company secretary.

The company recognises that maintaining appropriate confidentiality is crucial in ensuring that potential Whistleblowers make disclosures of bribery, corruption and fraud in an open and timely manner, and without fear of reprisal.

Accordingly, the company will take all reasonable steps to protect the identity of the Whistleblower and will adhere to any statutory requirements in respect of the confidentiality of disclosures made. However, in appropriate cases, disclosure of the identity of the Whistleblower, or the allegation made by them, may be unavoidable.

8. COMPLIANCE

It is your responsibility to understand and comply with this policy. You will not be excused for any breach of this policy because you were instructed or influenced to act in a way that constitutes a breach of this policy. Ignorance will not be accepted as justification for a breach.

If there is an alleged breach of this policy, it may be investigated. If an investigation discloses that a breach is substantiated, disciplinary action may be taken, which may include a formal warning, suspension, reassignment or demotion, or termination of employment.

9. REPORTING

The following procedures should be observed in circumstances of a breach or suspected breach of this policy. These steps are guidelines only and different processes or steps for dealing with complaints may be taken on a case by case basis.

1. Formally report the alleged breach to your supervisor, manager, human resource manager or a senior manager either by initiating a discussion or setting out the complaint in writing.

   For this purpose, it is important that you keep a written record of the incident(s) including:

   - day, date, time and location of the incident
   - names of the people involved, including witnesses
   - details of what happened.

2. Once a disclosure has been received, the company will consider the most appropriate action. This might include an investigation of the alleged conduct, either by an appropriate person or a group of people, such as a committee.

3. Any investigation in relation to a disclosure will be conducted promptly and fairly, with due regard for the nature of the allegation and the rights of the persons involved in the investigation.

4. Any evidence gathered during an investigation, including any materials, documents or records, must be held by the investigator, and held securely.

5. During the investigation, the investigator will have access to all of the relevant materials, documents, and records. The directors, officers, employees and agents of the company must cooperate fully with the investigator.

6. Following the investigation, a final report will be issued, and appropriate action taken where applicable. If appropriate a disclosure may be referred to law enforcement agencies.

   If the Whistleblower was involved in the conduct, which was the subject of the disclosure, the fact that the Whistleblower has made the disclosure may be taken into account in

determining the severity of the disciplinary measures, if any, that may eventually be taken against such Whistleblower.

10. FURTHER QUESTIONS

This policy does not cover every possible event or action. There will be circumstances where it is difficult to know what to do. In such cases you must exercise caution and common sense and comply with the underlying principles of this policy. If you have any questions or doubts about this policy please direct them to your supervisor, manager, human resources or a senior manager.

11. DOCUMENT CONTROL

11.1 This policy will be reviewed on a two-yearly basis.
11.2 If at any time relevant legislation in updated, an operational requirement changes, or risk is reassessed or identified then an earlier review and relevant amendment will be made.
11.3 Printed versions of this policy are considered uncontrolled.