

JAPARA

JAPARA HEALTHCARE LIMITED

ACN 168 631 052

Political Donations Policy

**Approved by the Board of Japara Healthcare Limited
on 2 December 2019**

1 Overview

Japara Healthcare Limited (**Japara**) and its subsidiaries (**the Group**) recognise the role public companies play in supporting the democratic process. From time to time the Group participates in public policy activities with the major political parties. However, political donations and involvement in political fundraising activities can lead to perceptions of cash for access or favours.

This Political Donations Policy (**Policy**) has been established by the Board of directors of Japara (**Board**) to avoid the risk of such perceptions and to ensure that Japara is open and transparent in its approach to political donations and its interaction with political parties.

2 Scope

This Policy applies to all employees, contractors and directors of the Group (collectively referred to as **Employees**).

The Group acknowledges the right of individuals to participate in the political process. Accordingly, this Policy does not apply to any political donations made by an Employee in a personal capacity nor does it seek to restrict Employees from having political views or associations (including membership of political parties, attendance at political events, or making personal political donations).

3 Definition

A political donation includes a gift or payment made to, or for the benefit of:

- a political party;
- an elected member of Parliament or of a local council;
- a candidate or group of candidates;
- a third-party campaigner; or
- an employee of a local council or Government Department.

Specific examples of political donations include:

- a donation of money (including expense reimbursement);
- a contribution, entry fee or other payment to participate in a fundraising event or function where it is primarily a political fundraiser and payment forms part of the proceeds of the event;
- a subscription paid to a political party for membership or affiliation; and
- non-cash payments such as gifts or prizes for a political fundraiser or purchasing items at a political fundraiser.

4 Obligations

All political donations by or on behalf of the Group require pre-approval by the Board.

Employees must not act as representatives of the Group at political activities without the Chief Executive Officer's prior approval.

Employees must not act as representatives of the Group at political fundraising activities (including as a guest of a third party) without the Board's prior approval.

Attendance by Employees at all political activities as representatives of the Group must be strictly for public policy or commercial reasons.

Employees expressing political views, attending political activities or making political donations in a personal capacity, should make it clear that such actions are purely in a personal capacity and not as a representative of the Group.

Employees are to be familiar with this Policy and act in accordance with it at all times. An Employee may be disciplined if they do not comply with this Policy. Disciplinary action may include termination of employment.

5 Review of Policy

The Board is responsible for the review and oversight of this Policy.