

CODE OF CONDUCT

Document Number 1.01

Version 2.1

Effective Date: 1 March 2020

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1. Purpose

Sigma Healthcare requires the highest standards of integrity and conduct from all team members. This Code of Conduct outlines the principles and behaviours required of Sigma Healthcare team members to maintain and achieve these standards. Any breach of the Code of Conduct by team members may result in disciplinary action in line with Sigma Healthcare's disciplinary procedures, up to and including termination of employment.

Individuals who identify breaches of this Code of Conduct by other team members should report the breach to their immediate manager or a Human Resources representative for investigation. (Refer Sigma Healthcare's *Whistleblower Policy* and *Good Working Relationships Policy*.)

This policy applies to behaviours that occur:

- In connection with work, even if it occurs outside normal working hours
- During work activities, for example when dealing with Sigma Healthcare stakeholders
- At work related events, for example at conferences and work related social functions
- On social media where team members interact with colleagues or Sigma Healthcare stakeholders

2. Scope

This policy applies to all Sigma Healthcare team members engaged on a full-time, part-time, casual or temporary basis and contractors engaged by Sigma Healthcare or working on Sigma Healthcare sites; for the purpose of this policy referred to as "team members". Sigma Healthcare stakeholders include shareholders, customers, suppliers, the public or others on Sigma Healthcare's behalf; for the purpose of this policy referred to as "stakeholders".

3. Definitions

Sigma Healthcare: means all companies within the Sigma Healthcare Group including Sigma Company Limited (Sigma), Central Healthcare Services Pty Ltd (CHS), Linton Street Pty Ltd (SWAPS), MPS Hold Co. Pty Ltd (MPS), MIA Hold Co. Pty Ltd (MIA) Discount Drug Stores Pty Ltd (DDS) and Pharmasave Australia Pty Ltd (Pharmasave).

Team member: means an employee of Sigma Healthcare.

4. Key Principles

The key principles of the Sigma Healthcare Code of Conduct are:

- Honest and ethical behaviour
- Respect for people and property
- Legal compliance

4.1 Honest and Ethical Behaviour

Sigma Healthcare team members will conduct themselves with honesty and integrity. We will act in a professional manner that is consistent with Sigma Healthcare's values by:

- Not divulging confidential information about the organisation, its team members customers or suppliers without proper authorisation;
- Minimising any conflict of interest by making full disclosure to Sigma Healthcare where a potential or actual conflict of interest exists (including, but not limited to, supplementary employment; commission or fees received; or, receipt of material gifts or benefits – (Refer Sigma Healthcare's Conflict of Interest Self-Assessment and Gifts, Gratuities and Entertainment Policy Guidelines).
- Not using Sigma Healthcare time inappropriately for personal purposes;
- Reporting any knowledge of fraud, material error, breach of law, or of a concealed practice against the interest of Sigma Healthcare (Adherence to Sigma Healthcare's policies relating to Contracts, Legal Engagement and Delegated Authorities);
- Not using any company asset on an unauthorised basis for personal use or gain (including goods, money, equipment, corporate cards, intellectual property or the services of other areas of the organisation).

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4.2 Respect for People and Property

Sigma Healthcare team members will treat all other team members and Sigma Healthcare stakeholders courteously, fairly and without harassment or unlawful discrimination in any other form. We endeavour to nurture a culture that embraces individual difference in all its forms and values the many benefits that transpire from all aspects of diversity. We will also maintain the organisation's property with respect and care.

We will undertake this by:

- Treating all Sigma Healthcare team members and stakeholders with dignity, respect, professionalism, promptness and helpfulness;
- Acknowledging and appreciating the diversity of our workforce and having regard for cultural and religious sensitivities;
- Complying with Sigma Healthcare's Good Working Relationships Policy covering Equal Opportunity and Anti-Discrimination commitments;
- Not participating in any verbal, written or physical act in the workplace (including bullying, harassment or fighting) that offends, intimidates or endangers the safety of any other team member or person working on Sigma Healthcare premises;
- Providing and maintaining a safe and healthy environment for our team members and stakeholders – this includes our work environment and local community;
- Preventing damage to Sigma Healthcare's property or property owned by team members or Sigma Healthcare stakeholders. Theft of company property or goods will not be tolerated;
- Complying with all Sigma Healthcare policies and procedures;
- Observing and complying with lawful and safe instructions of the organisation and persons with authority to issue instructions.

4.3 Legal Compliance

Sigma Healthcare team members will comply with all Federal, State and local laws and regulations with particular regard for:

- Not participating in or allowing the organisation to become involved in any illegal activity or transaction (directly or indirectly);
- Not seeking or accepting any bribe, commission or procurement fee, or share commission with an agent or any other person in connection with a sale, purchase, or any other activity or transaction arising in the course of the business of the organisation, or concerning a service rendered by the organisation;
- Ensuring delegated authority limits are complied with (Refer Sigma Healthcare's Delegated Authorities Manual);
- Ensuring that legislation governing insider trading and related issues is understood and followed by team members with share price sensitive information (Refer Sigma Healthcare's Share Trading Policy);
- Adherence to the Therapeutic Goods Act, Regulations and Orders, in particular the Code of Good Wholesaling Practice (GWP) and the Code of Good Manufacturing Practice (GMP);
- Adherence to all Sigma Healthcare Health & Safety policies and procedures.

5. Breach of Policy

As is the case with all of Sigma Healthcare's Policies, failure to comply with this Policy may result in disciplinary action, leading up to and including, termination of employment.

Material breaches of this Policy will be reported to Sigma Healthcare's People & Remuneration Committee in accordance with ASX Principles.

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6. Disclaimer

This Policy sets out Sigma Healthcare's general approach to the matters it covers but is not intended to bind Sigma Healthcare. Accordingly, this Policy acknowledges that Sigma Healthcare may, at its absolute discretion, amend, vary or terminate the Policy at any time and in any individual case, may depart from the policy wholly or in part. #

7. Team Member Declaration:

I have read and understood the Sigma Healthcare Code of Conduct and undertake to comply with these principles. I understand that a breach of this Code may result in disciplinary action being taken in line with Sigma Healthcare's disciplinary procedures, which may be up to and including termination of employment.

Name of Team Member:

Signature:Date: