

Fraud Policy

Version 3.0

Effective Date: 26 June 2026

1. Purpose

Sigma Healthcare Limited, its Related Bodies Corporate and Associated Entities (including wholly owned or majority owned or controlled subsidiaries) (**Sigma** or **Sigma Group**) is committed to upholding the highest standards of corporate governance. This Fraud Policy (**Policy**) has been established to support good corporate governance, defining clear roles and responsibilities for the detection, prevention, monitoring, reporting, and investigation of fraud. This Policy supports Sigma's Enterprise Risk Management Policy and forms an integral part of our internal control environment.

This Policy is designed having regard to applicable legal and regulatory obligations, including the Corporations Act 2001 (Cth), Criminal Code Act 1995 (Cth), Privacy Act 1988 (Cth), ASX Corporate Governance Principles and relevant industry obligations.

2. Policy Application

This Policy applies to all activities potentially subject to fraud, involving all Sigma team members (**team member(s)**) engaged on a full-time, part-time, casual or temporary employee of any member of Sigma Group and extends to any secondee, contractor or consultant of, or adviser to, any member of Sigma Group whose terms of engagement require them to comply with this policy as though they were an employee, as well as directors, including Sigma Board members; suppliers; contractors and any other parties with a corporate relationship with any Sigma company in any location.

All people to whom this Policy applies must comply with it as a condition of their employment or engagement with Sigma.

This Policy is available via the Sigma Groups intranets, on Sigma's website (www.sigmahealthcare.com.au) and in such other ways as will ensure that the policy is available to all Sigma Group team members and other eligible persons.

3. What is Fraud or Corruption?

Fraud is any dishonest act or omission intended to obtain an improper advantage or cause a loss to Sigma or another party.

Fraud usually involves dishonestly obtaining an advantage through intentional misrepresentation, deception, or concealment of information.

Fraud includes activities such as deception, bribery, forgery, extortion, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts or other activities that involve an act of deceit against Sigma to obtain a personal or collective advantage, avoid an obligation, or cause a loss to Sigma

Fraud and corruption may involve financial or non-financial benefits and include attempted, suspected or facilitated conduct.

Fraud Policy

Version 3.0

Effective Date: 26 June 2026

Fraud and corruption may also include where the parties concerned receive intangible benefits, such as status or information.

Examples of fraud that could potentially occur at Sigma, whether from within the organisation itself or from an external source, include but are not limited to:

- financial theft or misappropriation of cash (e.g. payment to phantom employees, payment to employees or contractors for tasks not performed);
- theft of medicines or other products that Sigma distributes (e.g. sale of Sigma products for personal gain or theft for own use);
- improper or unauthorised expenditure including on company credit cards (e.g. luxurious or excessive expenditure, inflated or faked expense claims, personal expenditure)
- unauthorised or inappropriate access to, or release of, data or information (including hacking or any activity that compromises cyber security)
- forgery or alteration of documents and withholding documents (e.g. misrepresentation of qualifications to obtain employment, providing false or misleading information or not providing information when there is a legal obligation to do so)
- inappropriate use of insider knowledge and information (e.g. disclosing Sigma's confidential information for personal gain without authority, or dealing, or getting others to deal, in Sigma securities while in possession of unpublished price-sensitive information)
- misappropriation or misallocation of Sigma's resources, such as computer or technology equipment or other company supplies
- falsification of records and data, such as payments or payroll records or hours worked (e.g. clocking in early)
- third-party fraud risks - inappropriate or favourable treatment of suppliers; contractors; team members or potential team members; customers; consultants or other people that Sigma does business with for personal benefit. For example, awarding contracts to suppliers for personal gain or hiring/promoting inappropriately.
- fraudulent financial reporting (e.g. misrepresenting financial statements, or misstating or omitting financial accounting information, to give investors a mistaken impression about Sigma's operating performance and profitability)
- identity theft through misuse of personal or sensitive information
 - getting injured outside of work and claiming the injury occurred at work or falsifying an illness or injury to inappropriately receive workers compensation, manipulation of inventory systems, stock records or distribution data;

Fraud Policy

Version 3.0

Effective Date: 26 June 2026

- manipulation of government reimbursement schemes (including PBS or other funding arrangements);
- falsification of regulatory, quality or compliance records (including Therapeutic Goods and distribution records);
- conflicts of interest leading to improper procurement or supplier selection decisions;
- bribery, kickbacks or improper inducements involving suppliers, customers or regulators.

4. What is not fraud?

4.1 Other breaches of Code of Conduct

Engagement in fraudulent activity or corruption is a breach of Sigma's Code of Conduct. However, not all Code of Conduct breaches are fraudulent or corrupt. Examples of breaches of Sigma's Code of Conduct which are not fraud or corruption include:

- workplace grievances, such as complaints of injustice in the assessment of a team member's performance or disciplinary procedures;
- complaints of discrimination, harassment, or bullying;
- reports of suspected breaches of Sigma's Health and Safety Policy; and
- reports of suspected breaches of other laws and regulations which apply to Sigma's operations.

Across Sigma there are several policies and codes which each promote a culture of conducting our business with honesty, fairness, and integrity. There are dedicated reporting channels which exist under those policies and codes.

4.2 Workplace Grievances

Team members should use normal business channels (e.g. approaching their line manager) first for issues relating to their own personal circumstances.

Team members are expected to report and resolve grievances or disputes relating to employment including specific working conditions and/or unfair treatment through the Issue Resolution processes set out in Sigma's Respect at Work Policy and supporting People & Culture policies and procedures.

4.3 Operational risk or compliance issues

Team members should report operational risk, and compliance matters via the dedicated reporting channels according to the relevant policy's Complaints handling.

If a team member is unsure if their concern involves fraud, they should report it under this Policy and Sigma will determine the appropriate handling process.

Fraud Policy

Version 3.0

Effective Date: 26 June 2026

5. Fraud and Corruption Reporting

All team members are expected to report known, suspected, or potential fraud or corruption as soon as practicable.

Team members should report any matters to their immediate line manager. The manager is then responsible for reporting the matter to the Executive General Manager of the business unit they work in.

If the matter to be reported concerns your immediate manager or if you are not satisfied that your immediate manager is treating your concerns seriously, report the matter to your Executive General Manager of the business unit you work in.

Alternatively, report the matter to the Chief Legal Officer (**CLO**) & Company Secretary, Chief Financial Officer (**CFO**), the Chief People Officer (**CPO**) or the Audit Committee chair.

5.1 Protected disclosure – Whistleblowers

There are a variety of avenues available to Sigma Group team members to express any such concerns safely, confidentially and without fear of intimation, disadvantage, or reprisal.

Individuals may report suspected fraud through the channels set out in this Policy or via Sigma's Whistleblower Policy.

Reports of fraud may qualify as protected disclosures under the Corporations Act 2001 (Cth) and in that case, Sigma will:

- protect the confidentiality of whistleblowers in accordance with legal requirements;
- prohibit retaliation, victimisation or detriment;
- handle disclosures in accordance with the Whistleblower Policy.

For more information see Sigma's Whistleblower Policy.

Fraud Policy

Version 3.0

Effective Date: 26 June 2026

6. Roles and Responsibilities

In line with Sigma's Risk Management Policy, responsibility, and accountability for risk management – of which fraud risk is a component – is shared across the organisation.

From an organisational perspective the responsibility for fraud risk management is distributed as follows:

6.1.1 Board and Audit Committee

- Oversee Sigma's fraud risk management framework;
- Monitor material fraud risks and incidents.

6.1.2 Management

- Promote a strong ethical business culture;
- Implement effective internal controls;
- Ensure appropriate response to reported incidents.

6.1.3 Risk, Legal and Compliance Functions

- Maintain fraud risk framework;
- Support investigations and regulatory engagement;
- Monitor compliance with this Policy.

6.1.4 Internal Audit

- Provide independent assurance over fraud controls.

6.1.5 All Team Members

- Comply with this Policy and related controls;
- Remain alert to fraud risks;
- Report concerns promptly.

Fraud Policy

Version 3.0

Effective Date: 26 June 2026

Obligations of Sigma Team Members

Sigma's team members play a critical role in the front-line defence of Sigma's fraud risks:

Sigma's Position on Fraud	Expected Behaviours of Sigma team members	Internal Controls and processes
• Sigma does not tolerate fraudulent conduct by its team members or others that do business with Sigma. • Suspected fraudulent conduct shall be reported, taken seriously and investigated. • Action is taken against those who are found to have acted fraudulently including, where appropriate, disciplinary action, referral for criminal prosecution; and/or civil action to recover funds and related losses.	• All team members are expected to play a role assisting in the prevention, detection and reporting of suspected fraudulent conduct. • All team members are expected to be guided by Sigma's Code of Conduct, compliance standards and supporting policies in day-to-day decision-making. • Concerns should be raised through appropriate reporting channels. • Team members are expected to participate in training, awareness raising, monitoring and review activities.	• The policy aligns with, and shall be read in conjunction with, Sigma's Code of Conduct, Whistleblower Policy and Risk Management Policy.

6.2 General obligations of all team members

- Team members must not engage in, participate in, cover up or in any way assist in (including by failing to act) any form of fraud or corrupt conduct.
- Team members must not engage in, participate in, cover up or in any way assist in (including by failing to act) any behaviour or conduct which involves or may be perceived as victimisation, bullying, harassment, or any other form of reprisal action against:
 - another Team member who makes a report of wrongdoing covered by this Policy; or
 - any person against whom allegations of wrongdoing have been made, if the results of the internal inquiry or investigation show they were not implicated in improper behaviour.

Fraud Policy

Version 3.0

Effective Date: 26 June 2026

- Team members must comply with the internal controls, systems, relevant policies, and directions in relation to carrying out their respective duties or functions. Examples of these internal controls include policies and procedures, financial delegation, and approval authority. (The objectives of such internal controls include assisting in the prevention, deterrence, and detection of the type of conduct prohibited by this Policy.)
- Team members must take steps to protect company and personal information including restrict access to certain documents and files.
- Team members must be alert and wary of various and emerging types of fraudulent activity e.g. 'payment redirection fraud' where a fraudster impersonates someone such as the CEO by email and directs Team Members to pay to a different account.
- Team members must familiarise themselves with this Policy and with related policies such as the Code of Conduct, Whistleblower Policy, Anti-Bribery & Corruption, and Delegations of Authority
- Team members must report any incident they become aware of involving (or which they reasonably believe involves) fraud or corrupt conduct.
- Team members must report any conduct that they reasonably believe constitutes detrimental or reprisal action against a person who has made a report of wrongdoing under this Policy.

6.3 Additional Responsibilities of Management

To enable Sigma to conduct itself and carry out its duties and activities free from fraud and corrupt conduct, Management shall comply with the following obligations and responsibilities in addition to the general obligations outlined above:

- Be familiar with the types of misconduct that might occur within their area of responsibility and be attentive to any sign of wrong doing.
- Ensure that those reporting to Management comply with the internal controls, systems, relevant policies and directions as apply to them in relation to carrying out their duties or functions.
- Treat seriously all reports of alleged fraud and corrupt conduct and ensure that such reports are dealt with in accordance with the applicable procedures.
- Take such action as is required to prevent retaliation or retribution against a person who has made a report of fraud or corrupt conduct.
- Promote awareness of this Policy and related policies to all team members.

6.4 Additional Responsibilities of Team Members with Financial Delegations

Any person with financial delegation or responsibility for administering financial transactions are required to comply with their assigned delegation and comply with all relevant finance policies and procedures, financial systems requirements, and other financial controls of Sigma.

Fraud Policy

Version 3.0

Effective Date: 26 June 2026

7. Reporting Fraud and Corruption

All team members are expected to report known, suspected or potential cases of conduct which is in breach of Sigma's Code of Conduct through the appropriate reporting channels to enable Sigma to consider any appropriate action.

Confidential treatment of reporting actions, information provided by team members and response actions is important. Individual confidentiality shall be respected throughout the reporting and investigation process. Reporting team members may remain anonymous to the extent possible by law (refer to the Whistleblower Policy).

7.1 Fraud Investigation

The process for fraud investigation will depend on the severity and complexity of the suspected fraud event.

The Chief Legal Officer has the authority to initiate an investigation. The Chair of the Risk Compliance and Sustainability Committee and the Chair of the Audit Committee must be notified of any investigations by the Chief Legal Officer.

The Chief Legal Officer will determine the appropriate investigation team having regard to the specific circumstances of the matter.

The investigation team may comprise:

- Chief Legal Officer;
- Chief People Officer;
- Chief Financial Officer;
- Members of Sigma's appointed Internal Auditors; and
- External consultants and specialists.

Investigation teams may also include other Legal, Finance, People & Culture, Internal Audit and external specialists as determined by the Chief Legal Officer.

Business units cannot 'self-investigate'. The investigation team may not include anyone who has executive or management responsibility for the business unit or team which is the subject of the investigation.

7.2 Actions

The investigation team will:

- define and conduct investigations;
- engage external specialists as required to support independence and objectivity;
- assess investigation results and propose recommended actions;

Fraud Policy

Version 3.0

Effective Date: 26 June 2026

- consider whether to notify law enforcement or regulatory agencies of events (engage with Audit Chair where appropriate);
- determine whether to seek to recover any misappropriated monies or assets;
- make recommendations regarding sanctions on the team members involved, up to and including termination;
 - determine whether to take any remedial action against third parties which may be available to Sigma pursuant to the terms of any commercial arrangement with that third party or otherwise, including termination of the arrangement;
 - notify insurers of fraud as required; and
 - implement appropriate stakeholder interaction procedures and communications, including, but not limited to customers, suppliers, shareholders, investors, government agencies, regulatory authorities, media, the public or others on Sigma's behalf.

The Investigation team may take such other action as it considers appropriate in the circumstances having regard to the intention of this policy and Sigma's broader risk management framework.

Any communications about a fraud investigation must be approved by the Chief Legal Officer.

A checklist for the typical investigation process is attached to the Policy – refer to **Annexure 1**.

7.3 Investigation Process

The investigation team formed to investigate the matter shall follow Sigma's procedures for managing a complaint or disciplinary issue, consistent with Sigma's governance and internal procedures. This generally involves:

- undertaking a fair, independent, and discreet investigation into the substance of the report to determine whether there is evidence to support the matters raised;
- respecting individual confidentiality;
- collecting all available data and verifying the reported information; and
- proceeding with due care and appropriate speed.

Investigation outcomes shall be documented, including evidence obtained, findings, root cause analysis, and recommended actions.

7.4 Disciplinary Action

Committing a fraudulent act and breach of internal policy is viewed seriously by Sigma and team members found to be involved will be subject to disciplinary action. Disciplinary action may include termination of employment, recovery of losses / proceeds (including by way of civil action) and/or reporting to Police for criminal prosecution.

Fraud Policy

Version 3.0

Effective Date: 26 June 2026

7.5 Remediation

Following a fraud incident, appropriate risk treatment actions shall be implemented to address control weaknesses and reduce the likelihood of recurrence.

Learnings from incidents must be incorporated into risk assessments, controls, and processes as part of ongoing monitoring and review.

7.6 Reporting to Audit Committee and Risk Compliance and Sustainability Committee

Fraud risks and incidents shall be escalated in accordance with Sigma's governance framework, considering the level of risk exposure, including financial, regulatory, and reputational impacts.

Material fraud incidents shall be reported to senior management and, where appropriate, to the Audit Committee, the [Risk Compliance and Sustainability Committee](#), and Board.

Sigma will comply with all applicable legal and regulatory obligations, including engagement with law enforcement, regulators, and disclosure obligations under the ASX Listing Rules where required. Any engagement with law enforcement, regulators or the ASX is performed by the Chief Legal Officer or at their direction with their prior approval.

7.7 Record Keeping

Fraud-related information, including reports, investigations and outcomes, must be recorded and maintained in accordance with Sigma's record management requirements to support transparency, accountability, and audit.

Access to investigation records will be restricted on a need-to-know basis and the release or disclosure of any investigation records will be determined by the Chief Legal Officer.

7.8 General

If the Chief Legal Officer is the subject of any investigation of fraud, any decision or action required by the Chief Legal Officer under this policy with respect to the investigation of fraud may be performed by either the Chair of the Risk Compliance and Sustainability Committee or in the alternate, the Chair of the Audit Committee.

8. Further Information

8.1 Monitoring compliance

Sigma may audit compliance with this policy by any team member (or other person subject to this policy).

8.2 More information

If you have any questions arising from this policy, please contact the Company Secretary.

Fraud Policy

Version 3.0

Effective Date: 26 June 2026

9. Breach of Policy

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

10. Disclaimer

This policy sets out Sigma's general approach to the matters it covers but is not intended to bind Sigma. Accordingly, this policy acknowledges that Sigma 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.

11. Document control and related documents

Name of Document	Fraud Policy	
Document Author	Deputy Chief Financial Officer	
Document Approver	Board via Audit Committee (26 June 2026)	
Document Reviewers	Chief Legal Officer	Chief Financial Officer
Review Period	Two-yearly	
Related Documents	Code of Conduct, Whistleblower Policy, Anti-Bribery and Corruption Policy, Respect at Work Policy, Risk Management Policy	

12. Policy Version Register

Version	Modified by	Description of changes	Authorised by	Effective date
2.0		Minor, non-substantive amendments Fraud Policy v2.1 published 9 December 2020 and Board feedback on 9 December 2021		9 December 2021
3.0		Policy update		

Fraud Policy

Version 3.0

Effective Date: 26 June 2026

Annexure A – Fraud Investigation Checklist

Area	Action	Responsibility	Status
Investigation Team Composition	Agree composition of Investigation Team	CPO in consultation with CFO and Chief Legal Officer & Company Secretary	
Police notification	Consider whether notification is required to law enforcement agencies of the event and other regulatory bodies as appropriate. Engage with Audit Committee Chair where required.	Chief Legal Officer & Company Secretary in consultation with CPO and CFO	
Asset recovery	Make recommendations to seek to recover assets / funds	CPO in consultation with CFO and Chief Legal Officer & Company Secretary	
Team members	Make recommendations regarding appropriate remediation / disciplinary actions	CPO in consultation with CFO and Chief Legal Officer & Company Secretary	
Confidentiality	Remind and enforce confidentiality requirements around Investigation Team activities	Chief Legal Officer & Company Secretary in consultation with CPO and CFO	
Evidence	Implement arrangements to gather and secure evidence gathered	Chief Legal Officer & Company Secretary in consultation with CPO and CFO	
Insurance	Notify insurers as required	Chief Legal Officer & Company Secretary in consultation with CPO and CFO	
Investigation	Define and conduct investigation appropriate to complexity and area of suspected fraud	CPO in consultation with CFO and Chief Legal Officer & Company Secretary	
Recommendations	Assess investigation results and propose recommendations	Investigation Team	