



# ***Corporate Governance***

***at***

***Anteo Diagnostics Limited***



# **Anteo Diagnostics Limited**

## **CORPORATE GOVERNANCE AT ANTEO DIAGNOSTICS LIMITED**

The Board of Directors of Anteo Diagnostics Limited (the “Company”) are committed to achieving the highest standards of corporate governance. The Company's policies are set out in the following documents:

### **1. Board Charter**

**The Board Charter** formalises and discloses the functions performed exclusively by the Board and those delegated to the appointed managers of the Company.

### **2. Audit & Risk**

The Board of Directors has formally constituted an Audit & Risk Committee. The Audit & Risk Committee is guided by **the Audit & Risk Committee Terms of Reference**.

### **3. Risk Management Policy**

The Company is responsible, on behalf of its shareholders, for managing the company assets in order to maximise shareholder value. The **Risk Management Policy** provides guidelines within which the company minimises the risks associated in managing those assets.

### **4. Nomination & Remuneration**

The Board of Directors has formally constituted a Nomination & Remuneration Committee. The Nomination & Remuneration Committee is guided by the **Nomination & Remuneration Committee Terms of Reference**.

### **5. Ethical Standards and Corporate Code of Conduct**

Anteo Diagnostics Limited aims to act with integrity in all of its business dealings. **The Code of Conduct** guides all person employed by the Company, (including the Board of Directors, managers and staff), in the way business is done whilst representing the Company.

### **6. Continuous Disclosure Policy**

The Corporations Act and ASX Listing Rules require that the Company keeps the stock market fully informed with regard to information that may have a material effect of the price or value of its securities. The Company strictly conforms with these requirements through releasing all potentially price sensitive information to the ASX in line with the ***Continuous Disclosure Policy***.

## **7. Dealing in Securities**

All employees, Directors, managers and staff, of the Company are subject to the insider trading regulations of the Corporations Act in relation to any dealing in the Company's securities. The ***Securities Dealing Policy*** applies to all Directors, managers and staff of The Company and its subsidiary undertakings.

## **8. Shareholder Communications Policy**

The Company communicates with Shareholders in an open and honest manner. The ***Shareholder Communications Policy*** sets out the principles adopted by the Company.

## **9. Diversity Policy**

Anteo Diagnostics recognises its talented and diverse workforce as a key competitive advantage and the company outlines its approach to work place diversity through its ***Diversity Policy*** included below.

## **1. BOARD CHARTER**

### **Introduction**

Anteo Diagnostics Limited aims to have a Board of a size, composition, capability and commitment to adequately discharge its responsibilities and duties. The Board Charter and structure are moving towards compliance with Principles 1 and 2 of the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations (2<sup>nd</sup> edition).

### **Appointment to the Board**

All persons appointed to the Board will have consented to the appointment and have been provided with a letter of appointment containing:

- The term of the Director's appointment
- The time commitment envisaged
- The powers and duties of Directors
- Any special duties or arrangements attaching to the position
- Circumstances in which an office of Director becomes vacant
- Expectations regarding involvement with committee work
- Remuneration and expenses
- Superannuation arrangements
- Requirement to disclose Director's interests and any matters which affect the Director's independence
- The names of fellow Directors
- The trading policy governing dealings in securities (including any share qualifications) and related financial instruments by Directors, including notification requirements
- Induction training and continuing education arrangements
- Access to independent professional advice
- Indemnity and insurance arrangements
- Confidentiality and rights of access to corporate information
- A copy of the Company's constitution

### **Rights of Board Members**

Directors may access or request such information as they consider necessary to diligently and independently fulfil their responsibilities and have the authority to seek any information required from any officer or employee of the Company or its associated entities and such officers or employees shall be instructed by the Board to respond to such enquiries.

Directors will be given advance notice of all scheduled meetings of the Board, provided with an agenda of items to be discussed and will be provided with documentation pertinent to the business of the meeting in advance of the appointed date.

Non-Executive Directors will be remunerated at market rates for comparable companies for time, commitment and responsibilities.

Directors can enter into a deed of access and indemnity upon their appointment.

### **Independent Professional advice**

Independent professional advice may be sought on Company related matters, at the Company's expense, subject to prior approval by the Chairman. Such approval will not be unreasonably withheld.

## **Responsibilities of the Board**

- Oversight of the Company, including its control and accountability systems
- Appointing, reviewing the performance of and, where appropriate, removing the Chief Executive Officer
- Ratifying the appointment and, where appropriate, the removal of the Chief Financial Officer and the Company Secretary
- Input into, and final approval of, the development of corporate strategy by executive management.
- Reviewing and ratifying systems of risk management and internal compliance and control, codes of conduct and legal compliance
- Monitoring the performance of executive management in implementing strategy and ensuring the appropriate resources are available to enable the application of the strategic plans
- Approving and monitoring the progress of major capital expenditure, capital management, acquisitions and divestitures and dividend policy
- Approving and monitoring financial and other reporting

## **Relationship with Chief Executive Officer**

The Board has delegated responsibility for day to day management of the Company to the Chief Executive Officer. However, the Chief Executive Officer must consult the Chairman on matters that are sensitive, extraordinary or of a strategic nature.

## **Structure of the Board**

Ordinarily the Board of Directors will comprise at least three Directors with a majority of Directors being Independent Non-Executive Directors, one of whom will be the Chairman of the Board. The Chairman of the Board and the Chief Executive Officer shall be different individuals.

An Independent director is a Non-Executive Director (ie is not a member of management) and:

- is not a substantial shareholder of the company or an officer of, or otherwise associated directly with, a substantial shareholder of the company (5% or more of the total voting shares in the company).
- within the last three years has not been employed in an executive capacity by the company or another group member, or been a director after ceasing to hold any such employment.
- within the last three years has not been a principal of a material professional adviser or a material consultant to the company or another group member, or an employee materially associated with the service provided .
- is not a material supplier or customer of the company or other group member, or an officer of or otherwise associated directly or indirectly with a material supplier or customer .
- has no material contractual relationship with the company or another group member other than as a director of the company .
- has not served on the board for a period which could, or could reasonably be perceived to, materially interfere with the director's ability to act in the best interests of the company.
- is free from any interest and any business or other relationship which could, or could reasonably be perceived to, materially interfere with the director's ability to act in the best interests of the company.

Independent Directors are requested to confirm their independent status in writing annually on or around 30 June of each year.

Should circumstances demand or dictate then the structure of the Board may not conform to that stated above. In these circumstances the Company will ratify its agreement of this structure at a meeting of the Board of Directors and ensure that the market, operated by the Australian Stock Exchange, is informed of the fact and the reasons for the variation.

## **Board Committees**

The Board may operate through Committees that are responsible for particular areas of the business. The existing Committees are:

- Audit & Risk Committee
- Nomination & Remuneration Committee
- Science & Ethics Committee

Each Committee, or Board meeting, in dealing with matters within its responsibilities will operate in accordance with a written charter which is enshrined in policy documents specific to the committee. The Board and each committee will annually revisit its objectives and duties and evaluate the effectiveness of its performance.

These Committees enable a more detailed involvement of the Board with the business in line with the Committee charters.

## **Internal Policies Applicable to Directors**

The Board is also ultimately responsible for ensuring compliance of the Board of the Company and its officers / employees with Company policies including:

- Share Trading Policy
- Company Values and Code of Conduct
- Continuous Disclosure
- Equal Employment Opportunity
- Harassment
- Occupational Health and Safety Handbook

Each of these policies are the subject of documents specific to the policy.

## **2. AUDIT & RISK COMMITTEE TERMS OF REFERENCE**

### **Introduction**

Anteo Diagnostics Limited aims to have a structure that can independently verify and safeguard the integrity of the company's financial reporting. The Audit & Risk Committee Charter and structure conform to Principles 4 and 7 of the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations.

### **Terms of reference**

The primary purpose of the Audit & Risk Committee is to assist the Board discharge its responsibility in the following areas:

- Ensuring the Company adopts, maintains and applies appropriate accounting and financial reporting processes and procedures
- Facilitating the independence of the external audit process and addressing issues arising from the audit process and
- Ensuring the Company maintains effective risk management and internal control systems

### **Membership**

- The Audit & Risk Committee shall comprise not less than two members
- All members shall be Non-Executive Directors who possess requisite qualifications and financial literacy
- A majority of members shall be Independent Non-Executive Directors
- At least one member of the Audit & Risk Committee shall possess financial expertise (ie is a qualified accountant or other financial professional)
- The Chief Executive Officer, Chief Financial Officer and other Executives shall be invited to attend Audit & Risk Committee meetings at the Committee's discretion
- The external auditors and other external experts shall be invited to attend meetings at the Committee's discretion

### **Chairman**

- The Chairman of the Audit & Risk Committee will be an Independent Non-Executive Director
- The Chairman of the Audit & Risk Committee and the Chairman of the Board shall be different individuals.
- The Chairman of the Audit & Risk Committee is responsible for planning and conducting meetings
- The Chairman of the Audit & Risk Committee shall report significant findings and recommendations of the Committee to the Board after each Committee meeting

### **Secretary**

- The Company Secretary shall be appointed Secretary of the Audit & Risk Committee.
- In circumstances where the Secretary also acts as Chief Financial Officer the Secretary may be asked to leave the meeting whilst matters relating specifically to the Chief Financial Officer, accounting systems or results of auditor's reviews are the subject matter of the meeting.
- The Secretary, in conjunction with the Chairman, shall draw up an agenda which shall be circulated to the members of the Committee and the external auditors.

Should circumstances demand or dictate then the structure of the Audit & Risk Committee (Membership / Chairman / Secretary) may not conform to that stated above. In these circumstances the Company will ratify its agreement of this structure at a meeting of the Board of

Directors and ensure that the market, operated by the Australian Stock Exchange, is informed of the fact and the reasons for the variation.

## **Meetings**

- Meetings shall be held at least two times a year
- The quorum of the meeting shall be a minimum of two members
- The minutes of all Committee meetings shall be circulated to members of the Board
- The Chairman will call a meeting of the Audit & Risk Committee if so requested by any Committee member, the Chief Financial Officer or the external auditors
- The Chief Financial Officer and the external auditors shall be given notice of all meetings and have the right to attend and speak if it is the desire of the Committee

## **Authority**

- The Audit & Risk Committee shall have the authority to seek any information it requires from any officer or employee of the Company or its controlled entities and such officers or employees shall be instructed by the Board to respond to such enquiries
- The Audit & Risk Committee is authorised, subject to prior approval by the Chairman, to seek such independent professional advice as it considers necessary to diligently and independently fulfil the Committee's responsibilities, at the Company's expense
- The Audit & Risk Committee has no executive powers with regards to its findings and recommendations.

## **Responsibilities**

The responsibilities of the Audit & Risk Committee shall include, but are not limited to the following:

### **1. Financial Reporting**

- Reviewing financial statements and other financial information distributed externally
- Monitoring the procedures in place to ensure the Company is in compliance with the Corporations Law, Australian Stock Exchange Listing Rulings and other legislative and reporting requirements
- Reviewing related party transactions and considering the adequacy of disclosure of those transactions in the financial statements
- Reviewing reports on the Company's superannuation arrangements and compliance with relevant laws and regulations

### **2. External Auditors**

- Reviewing the nomination and performance of the external auditors
- Liaising with the external auditors and ensuring the annual and half-year statutory audits and reviews are conducted in an effective manner
- Approving audit fees
- Reviewing matters relating to auditor independence

The Audit Committee is responsible for the selection and recommendation of the Company's external auditor. The audit committee has recommended the external audit service be put to tender on a tri-annual basis. Further that in the event the external auditor is retained post 3 years, that the engagement partner be rotated on a 3 year basis.

### **3. Corporate Governance Compliance**

- Ensuring that a corporate Code of Conduct is established and periodically reviewed;
- Reviewing policies on sensitive issues or practices such as environmental issues;

- Reviewing policies to avoid conflicts of interest and reviewing past or proposed transactions between the Company and members of management and Directors
- Reviewing the Audit & Risk Committee Charter.

#### **4. Risk Management and Internal Control**

- Monitoring risk assessment and the internal controls instituted in line with the Risk Management Policy
- Reviewing risk management practices in line with the Risk Management Policy
- Monitoring the establishment of an appropriate internal control framework, including information systems and considering enhancements
- Reviewing external audit reports and, where major deficiencies or breakdowns in controls or procedures have been identified, monitoring remedial action taken by management to ensure such action is appropriate and prompt
- Reviewing reports on any major defalcations, frauds and thefts from the Company
- Initiating and supervising special investigations
- Reviewing reports on the adequacy of insurance coverage

Management is to continually report to the audit and risk committee or directly to the board the effectiveness of the Company's management of its material business risks.

### **3. RISK MANAGEMENT POLICY**

#### **Introduction**

Anteo Diagnostics Limited aims to maintain a sound system of risk oversight and management and internal control. The Risk Management Policy conforms to Principle 7 of the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations.

Anteo Diagnostics Limited views risk management as integral to its objective of effective management of Company assets and creating and maintaining shareholder value. The Company's Risk Management Policy provides the framework to manage the risks associated with its activities. It is designed to identify, assess, monitor and manage risk.

#### **Risk Profile**

The identification and effective management of risks is critical in achieving the Company's corporate goals. The Company focuses on effective management of the following material risks:

- business risks
- operating risks
- financial risks
- organisational risks
- corporate risks
- occupational health and safety risks

#### **Risk Management Policy**

Anteo Diagnostics Limited believes that risk should be managed on a continuous basis and optimises its ability to achieve business objectives by maintaining a system that assists appropriate management and provides early warning of risks.

The Company identifies, assesses, monitors and manages risk throughout the organisation in accordance with the Company's Risk Action Plan.

#### **Risk Process Elements**

Through the Risk Action Plan, the Company has implemented a comprehensive risk management program to manage its business risks.

The elements of the risk management process are:

1. Oversight of the Risk Management System

The Anteo Diagnostics Limited Board is responsible for overseeing the risk management framework.

2. Risk Profile

To ensure key risks are identified and analysed, the Company:

- defines risks in the context of the Group's strategy
- prepares risk profiles including a description of the material risks, the risk level and action plans used to mitigate the risk
- regularly reviews and updates the risk profiles

### 3. Risk Management and Compliance and Control

The identification and proper management of risk within the Company is an important priority of the Board and senior management. In developing a culture of risk management, each manager is responsible for appropriate responses to manage risk, aided by the risk action plans. To enable this, the Company:

- has implemented a systematic process to assist in the identification, assessment, treatment and monitoring of risks
- provides the necessary tools and resources to management and staff to support the effective management of risks
- reviews and communicates risk management best practice on a regular basis

### 4. Assessment of Effectiveness

Anteo Diagnostics Limited assesses the effectiveness of its Risk Action Plan through a well structured continuous improvement process to ensure risks and controls are continually monitored and reviewed. This includes appraisal of risk owners actions taken to manage risks.

### 5. Reporting

Anteo Diagnostics Limited ensures the Audit & Risk Committee and Board are adequately informed of significant risk management issues and the actions undertaken to manage risks on a regular basis.

## **4. NOMINATION & REMUNERATION COMMITTEE TERMS OF REFERENCE**

### **Introduction**

Anteo Diagnostics Limited aims to have a structure that allows it to adequately maintain a Board of a size, composition, capability and commitment to adequately discharge its responsibilities and duties.

The Company also aims to have a structure that allows it to ensure that the level and composition of remuneration is sufficient and that its relationship to corporate and individual performance is defined.

The Nomination & Remuneration Committee Charter and structure conforms to Principles 2 and 8 of the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations.

### **Role**

The role of the Nomination & Remuneration Committee is to:

- Annually review the composition of the Board and make recommendations on the appropriate skill mix, personal qualities, expertise and diversity required to discharge the Board's duties
- Determine whether the requirements identified in the above review are currently satisfied by the composition of the Board. This assessment is completed periodically and whenever an existing Non Executive Director retires
- Recommend to the Chairman of the Board ways in which the skills, experience, and expertise levels of existing Directors can be enhanced by both training and induction
- Recommend to the Board candidates the Committee considers appropriate for appointment to the Board having regard to the skills, experience and expertise assessments completed
- Recommend to the Board candidates the Committee considers appropriate for removal from the Board having regard to the skills, experience and expertise assessments completed
- Establish processes for
  - the identification of suitable candidates for appointment to the Board and the selection procedures for the appointment
  - the removal of non performing Directors
- Establish and maintain the selection, appointment and succession planning process of the Company's Chief Executive Officer
- Establish the process for the review of the performance of individual Directors and the Board as a whole
- Ensure that the appropriate procedures exist to assess the remuneration levels of the Chairman, Non-Executive Directors, Executive Directors, direct reports to the Chief Executive Officer, Board Committees and the Board as a whole
- Ensure that the Company adopts, monitors and applies appropriate remuneration policies and procedures
- Ensure that the Company's remuneration policy motivates Directors and managers to pursue the long-term growth and success of the Company within an appropriate control framework
- Ensure that the Company's remuneration policy demonstrates a clear link between key executive performance and remuneration
- Ensure reporting disclosures related to remuneration meet the Board's disclosure objectives and all relevant legal requirements.
- Make recommendations to the Board on appropriate remuneration, in relation to both the amount and its compositions, for the Chairman, Non-Executive Directors, Executive Directors, the Chief Executive Officer and Senior Executives
- Develop and recommend to the Board remuneration incentive programs such as bonus schemes, long term incentive plans and Company share schemes

- Develop, maintain and monitor appropriate remuneration policies and procedures
- Develop, maintain and monitor appropriate recruitment, retention and termination policies and procedures for senior management
- Develop, maintain and monitor appropriate incentive schemes
- Develop, maintain and monitor appropriate superannuation arrangements for the Company
- Develop remuneration related disclosure objectives for the Company and ensuring that publicly disclosed information meets those objectives, meets all legal requirements and is accurate

### **Membership**

- The committee should comprise a minimum of two members, the majority being Independent Directors
- The Chairman of the Nomination & Remuneration Committee and the Chairman of the Board may be different individuals
- The Chairman of the Nomination & Remuneration Committee shall be an Independent Non-Executive Director

### **Secretary**

- The Company Secretary shall be appointed Secretary of the Nomination & Remuneration Committee
- The Secretary, in conjunction with the Chairman, shall draw up an agenda which shall be circulated to the members of the Committee

Should circumstances demand or dictate then the structure of the Nomination & Remuneration Committee (Membership / Chairman / Secretary) may not conform to that stated above. In these circumstances the Company will ratify its agreement of this structure at a meeting of the Board of Directors and ensure that the market, operated by the Australian Stock Exchange, is informed of the fact and the reasons for the variation.

### **Meetings**

- The Committee shall meet annually, unless otherwise required
- Any Committee member may call a meeting of the Committee
- The Committee may invite any executive management team members or other individuals to attend meetings of the Committee, as they consider appropriate

### **Reporting**

- Copies of the Nomination & Remuneration Committee meeting minutes shall be circulated to all Directors
- The Chairman of the Nomination & Remuneration Committee shall report the findings and recommendations of the Committee to the Board after each Committee meeting

### **Attendance at meetings**

- A quorum will comprise any two Non Executive Director Committee members
- Each member shall have one vote and the Chairman of the Committee shall not have a second or casting vote

### **Authority**

The Committee has the authority to:

- subject to prior approval by the Chairman, seek such independent professional advice as it considers necessary to diligently and independently fulfil the Committee's responsibilities, at the Company's expense
- Obtain such resources and information from the Company in the fulfilment of its duties as it may reasonably require.

### **Review of committee performance**

The Committee will annually revisit its objectives and duties and evaluate the effectiveness of its performance.

### **Equity based remuneration scheme**

The Nomination and Remuneration Committee is currently reviewing a long-term incentive component for the executive and senior management remuneration packages (equity based). The development of such a policy will need to be cognisant of prohibiting entering in to transactions in associated products which limit the economic risk of participating in unvested entitlements under an equity based remuneration scheme.

## **5. ETHICAL STANDARDS AND CORPORATE CODE OF CONDUCT**

### **Introduction**

Anteo Diagnostics Limited aims to ensure that Company Directors and key executives are aware of the standards of ethical behaviour required of each of them either singly or as a group. The policies in this area conform to Principle 3 of the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations.

The Company Code of Conduct is the most important document issued by the Company. All personnel should understand and comply with the code, which applies to Directors, employees and contractors. The Board and Executive management believe that integrity is an important quality and one, which, by improving the Company's reputation, gives advantages to employees, contractors and shareholders.

The Corporate Code of Conduct outlines behaviour expected of all personnel encourages asking "What is the right thing to do?" The code is based on shared values and on behaviour that is intended to help corporate activity. The Company believes the values and behaviour outlined in the code accord with those of the communities in which we operate.

### **Anteo Diagnostics Limited – Corporate Code of Conduct**

The Company code of conduct has five central principles:

- Treating each other with respect
- Respect the law and act accordingly
- To be fair and honest in all dealings
- Using the Company's property responsibly
- Personal accountability for actions and their consequences.

All stakeholders in the Company care about how the Company gets results. The code provides a guide for the way the Company does business to get those results.

Each Director, employee and contractor should apply these code principles to their relationships with each other, their employer and everyone they deal with in their work for Anteo Diagnostics Limited.

In representing the Company the minimum standards are as follows:

#### **1. Others are treated with respect and dignity by:**

- Maintaining a safe and fair work environment
- Treating everyone with respect, regardless of their role or individual differences
- Valuing colleagues and their personal commitment to delivering quality products and services
- Encouraging cooperation and personal development in all who work with the Company
- Understanding and responding to the needs of customers and other stakeholders

#### **2. Personnel respect the law and act accordingly by:**

- Respecting the laws, customs and business practices of countries in which the Company operates, without compromising our code principles
- Notifying a manager or supervisor immediately of any potential or possible breach of laws or unethical behaviour
- Maintaining approaches that preserve the integrity of any laws under which the Company operates

**3. Personnel are fair and honest in dealings by:**

- Acting fairly and honestly at all times
- Not using coercive or misleading practices or falsifying or wrongfully withholding information
- Not placing ourselves in situations where our private interests could conflict directly or indirectly with our obligations to the Company
- Not accepting benefits such as gifts or entertainment that could create an obligation
- Not acting in ways which may cause others to question our commitment to the Company

**4. The Company's property is used responsibly by:**

- Not using the Company's funds to provide unreasonable benefits such as gifts or entertainment for ourselves or others
- Only using the Company's property, such as equipment or stores, for Company business
- Not disclosing confidential information without authorisation

**5. Personnel are accountable for their actions and the consequences by:**

- Taking personal responsibility for all issues over which the person has control and for the manner in which these are achieved
- Maintaining a system for recording, investigating and responding to any unethical practices, compliance breaches or complaints including those received from regulatory authorities, auditors or employees, in a fair and unbiased fashion.

Any employee who has any queries, concerns or suggestions about matters covered by this policy should speak to their manager or another member of management for guidance and assistance.

Any employee who becomes aware of or suspects any breach of any law should alert the Company Secretary. The identity of any employee reporting such conduct will be kept confidential insofar as is permitted by law and the Company will act fairly and in good faith towards any employee reporting such conduct.

## **6. CONTINUOUS DISCLOSURE POLICY**

### **Introduction**

Anteo Diagnostics Limited aims to have a structure that allows it to ensure the timely and balanced disclosure of all material matters concerning the Company. The Continuous disclosure policy conforms to Principle 5 of the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations.

### **Background**

ASX Listing Rule 3.1 requires that once a company becomes aware of any information concerning it that a reasonable person would expect to have a material effect on the price or value of the company's securities the company must tell the ASX that information.

Failure to comply can result in civil and criminal proceedings against both Anteo Diagnostics Limited ("the Company") and any person involved in the contravention. Substantial damages and penalties apply under the Corporations Act.

This document sets out the policies and procedures which will operate to ensure that Anteo Diagnostics Limited, as a listed company, meets its disclosure obligations under the ASX Listing Rules and Corporations Act.

### **1. Policy**

**Compliance with Disclosure Requirements** - It is the policy of the Company to act at all times with integrity and in accordance with the law, including the disclosure requirements of the ASX Listing Rules, ASX Guidance Notes, the ASX Corporate Governance Council's recommendations and the Corporations Act.

**Continuous Disclosure Notification of ASX** - The Company shall immediately notify the ASX if it becomes aware of any information concerning the Company that a reasonable person would expect to have a material effect on the price or value of the Company's shares or other securities.

**Exception** – The above do not apply to particular information while the following apply:

- A reasonable person would not expect the information to be disclosed; and
- The information is confidential and
- One or more of the following applies
  - a) it would be a breach of a law to disclose the information
  - b) the information concerns an incomplete proposal or negotiation
  - c) the information comprises matters of supposition or is insufficiently definite to warrant disclosure
  - d) The information is generated for the internal management purposes of the Company or
  - e) The information is a trade secret

**Material Information** - Information is material if it would or would be likely to influence persons who commonly invest in securities in deciding whether or not to subscribe for, buy or sell the Company's securities. In assessing materiality, consideration is given to the Company's business activities, size and place in the market.

**Avoiding a False Market** - If the ASX considers that there is or is likely to be a false market in the Company's shares or other securities and asks the Company to provide it with information to correct or prevent a false market, the Company will give the ASX such information as is necessary to correct or prevent the false market. Or if it is unable to do so, will request a trading halt. The extent of the information to be provided by the Company will depend on the nature of the false

market and the information requested by the ASX, which must be determined in the particular circumstances of each case.

### "False market":

ASX is likely to consider that there is or is likely to be a false market in the Company's shares or securities if there is a reasonable specific rumour or media comment in relation to the Company that has not been clarified or confirmed by an announcement to the ASX, and there is evidence that the market price of the Company's shares or securities is moving in a way referable to such a rumour or comment. The ASX may require disclosure in these circumstances even when the three limbs of the exception quoted above are met.

## 2. Responsibilities

**Board of Directors** - The Board is responsible for ensuring the Company complies with its continuous disclosure obligations. To this end, the Board is responsible for implementing and overseeing this disclosure policy.

**Company Secretary** - The Company Secretary shall be responsible for:

- ensuring the Company complies with the continuous disclosure requirements and
- communicating with the ASX in relation to Listing Rule matters including lodging disclosures with the ASX and
- overseeing and co-ordinating disclosure of information to the ASX, analysts, brokers, shareholders, the media and the public
- educating directors, officers and employees on the Company's disclosure obligations, policies and procedures and raising awareness of the principles underlying continuous disclosure and
- co-ordination, preparation and approval of all media releases by the Company and its related corporations (not including paid advertising)

### Authorised Company Spokespersons

Unless otherwise advised, the nominated Company spokespersons are the Chairman, Chief Executive Officer, Chief Financial Officer, Company Secretary and any other persons authorised by the Chairman or Chief Executive Officer.

The spokespersons are entitled to clarify information publicly released through the ASX, but they should not add to or reveal material price sensitive matters. The Company Secretary will liaise with those persons about Company's disclosure history to reduce the likelihood of inadvertent disclosure of such price sensitive matters.

The Company Secretary should be kept advised of all discussions with the media and consulted in relation to any significant briefings or disclosures.

## 3. Procedures

### Potentially Disclosable Information

- Any Director or executive officer of the Company or its subsidiaries or related corporations who becomes aware of any information concerning the Company that may be covered by the **Material Information** statement above shall immediately provide such information to the Company Secretary
- Disclosure issues will be a standing item at meetings of the Board of Directors. All potential matters for disclosure should be brought to the attention of the Company Secretary and signed schedules by senior executives will be tabled at each Board of Directors meeting

- Matters of strategic and / or operational importance that are likely to influence an investment decision may, depending on the special circumstances, be considered material information which should be released to the market (eg. the appointment of a key executive and any material terms of the relevant service agreement applicable). Such matters should be brought to the attention of the Company Secretary
- Decisions regarding whether something is either price sensitive or of strategic or operational importance which should be released to the market shall be made after consultation with the Chief Executive Officer, Company Secretary and any other relevant Individuals

### **Communication of Disclosable Information**

- All information that would be expected to have a material effect on the price or value of the Company's securities will be released by the Company Secretary to the ASX before any other person
- All information disclosed to the ASX in compliance with this policy will be promptly placed on the Company's website following receipt of confirmation from the ASX

**Managing Market Speculation and Rumours** - Market speculation and rumours, whether substantiated or not, have a potential to impact the Company. Speculation may result in the ASX formally requesting a statement from the Company regarding the speculation / rumours.

The Company does not respond to speculation and market rumours. Employees must observe this policy at all times. Notwithstanding this, the Company may issue a statement where:

- a) the Company considers it has an obligation to make a statement, or
- b) the Company is required to respond to a formal request from the ASX

**Trading Halts** - It may be necessary to request a trading halt from the ASX to ensure orderly trading in the Company's securities. Such circumstances could include:

- a) If confidential Information about the Company is inadvertently made public, to enable it to prepare an appropriate announcement to the market
- b) if preparing for a major announcement, the Company may need to arrange briefings in advance of the formal announcement to avoid market uncertainty
- c) to prevent an uninformed market pending announcement of a material matter

The Chairman and / or the Chief Executive Officer will make all decisions in relation to trading halts. No employee is authorised to seek a trading halt except with the approval of the Chairperson and / or Chief Executive Officer.

### **Contact with the Market**

- The Company interacts regularly with the market in a variety of ways including result briefings, market announcements, formal addresses and one on one briefings. In addition, the Company provides background and technical information to institutional investors and stock broking analysts to support announcements made to the ASX. In this section these types of contacts will be called "market discussions"
- The company recognises that it is important to have market discussions and that there should be no undisclosed price sensitive information communicated during these discussions. The authorised company spokespersons may clarify information that the Company has publicly released, but must not comment on material price or value sensitive issues that have not been disclosed to the market generally.
- Where a question raised in a briefing can only be answered by disclosing material price or value sensitive information, employees must decline to answer the question or take the question on notice and wait until the Company announces the information publicly through the ASX before responding. If any employee participating in the briefing considers that a matter

has been raised that might constitute a previously undisclosed material price or value sensitive matter, they must immediately refer the matter to the Company Secretary.

- If any other employee (other than an authorised company spokesperson) receives a request for comment from an external investor analyst or the media in relation to any matter concerning the Company, they must advise that person that they are not authorised to speak on behalf of the Company and must refer inquiries to the Company Secretary.
- Slides and presentations used in market discussions should be given to the ASX for immediate release to the market and posted on the Company's website. These slides and presentations must have first been provided to the Company Secretary before the relevant briefing in order for the Company Secretary to determine whether all information has been previously disclosed to the market or may require disclosure.

**Review of Analyst Reports** - The Company recognises the important role performed by analysts in assisting the establishment of an efficient market with respect to the Company's securities. However, the Company is not responsible for, and does not endorse, analyst reports that contain commentary on the Company.

- Where analysts send draft reports to the Company to comment, they must immediately be referred to the Company Secretary
- The Company will not provide non disclosed material price or value sensitive information in response to such reports. The information may be reviewed only to correct factual inaccuracy or historical matters. Any correction of factual inaccuracies by the Company does / will not imply endorsement of the contents of these reports

**Responding on Financial Projections and Reports** - Comments on the Company's financial projections and reports will only be made in relation to material that has already been publicly disclosed. Responses will be avoided which suggest that the Company or the markets current projections are incorrect. The Company will publicly announce any material change in expectations before commenting to anyone outside the Company.

**Disclosure of Corporate Governance Compliance** - The Company will include in the Corporate Governance section of its Annual Report, and / or make publicly available by posting to the Company's website In the Corporate Governance section, all such information as the Company is required to disclose as a consequence of the reporting requirements specified in the ASX Corporate Governance Council Recommendations.

**Breaches of This Policy** - Employees are expected to strictly comply with the continuous disclosure policy and breaches will be subject to disciplinary action, up to and including dismissal.

## **7. SECURITIES DEALING POLICY**

### **GUIDELINES FOR BUYING AND SELLING SECURITIES**

#### **1. Introduction**

These guidelines set out the policy on the sale and purchase of securities in the Company **by its Directors and employees (“Restricted Persons”)**.

Restricted Persons are encouraged to be long-term holders of the Company’s securities. However, it is important that care is taken in the timing of any purchase or sale of such securities.

The purpose of these guidelines is to assist Restricted Persons to avoid conduct known as ‘insider trading’. In some respects, the Company’s policy extends beyond the strict requirements of the Corporations Act 2001 (Cth) and its Regulations (**“Corporations Act”**).

#### **2. WHAT TYPES OF TRANSACTIONS ARE COVERED BY THIS POLICY?**

This policy applies to both the sale and purchase of any securities of the Company and its subsidiaries on issue from time to time.

#### **3. WHAT IS INSIDER TRADING?**

##### **3.1 Prohibition**

In broad terms, a person will be guilty of insider trading if:

- (a) that person possesses information which is not generally available to the market and, if it were generally available to the market, would be likely to have a material effect on the price or value of the Company’s securities (ie, information that is ‘price sensitive’);
- (b) and that person:
  - (i) buys or sells securities in the Company; or
  - (ii) procures someone else to buy or sell securities in the Company; or
  - (iii) passes on that information to a third party where that person knows, or ought reasonably to know, that the third party would be likely to buy or sell the securities or procure someone else to buy or sell the securities of the Company.

### 3.2 Examples

To illustrate the prohibition against insider trading described above, the following are possible examples of price sensitive information which, if made available to the market, may be likely to affect materially the price of the Company's securities:

- (a) the Company considering a major acquisition or disposal of assets;
- (b) the threat of major litigation against the Company;
- (c) the Company's sales and profit results materially exceeding (or falling short of) the market's expectations;
- (d) a material change in debt, liquidity or cash flow;
- (e) a significant new development proposal ie, new product or technology;
- (f) the granting (or loss) or a major contract, for example the granting of a new license agreement or product sale agreement;
- (g) management or business restructuring proposal;
- (h) a share issue proposal.

### 3.3 Dealing by third parties

A person does not need to be a Restricted Person to be guilty of insider trading in relation to securities in the Company. The prohibition extends to dealings by Restricted Persons through nominees, agents or other associates, such as family members, family trusts and family companies (referred to as "**Associates**" in these guidelines).

Restricted Persons should also be careful that third parties, including professional advisers, are subject to confidentiality with respect to price sensitive information of the Company.

### 3.4 Information however obtained

It does not matter how or where the person obtains the information – it does not have to be obtained from the Company to constitute price sensitive information.

### 3.5 Employee share schemes

The prohibition does not apply to acquisitions of shares or options by employees made under employee share or option schemes, nor does it apply to the acquisition of shares as a result of the exercise of options under an employee option scheme. However, the prohibition does apply to the sale of shares acquired under an employee share scheme and also to the sale of shares acquired following the exercise of an option granted under an employee option scheme.

### 3.6 Penalties for Insider Trading

The penalties for a breach of the insider trading provisions of the Corporations Act can be criminal, civil or both criminal and civil:

- Criminal penalties can either be fines of up to \$200,000 or imprisonment or both.
- Civil penalties can be a fine of up to \$200,000 for an individual.

## 4. GUIDELINES FOR TRADING IN THE COMPANY'S SECURITIES

### 4.1 General rule

The time for any Restricted Person to buy or sell Company securities is limited to the 30 day period from the:

- (a) date of the Company's Annual General Meeting;
- (b) release of the Company's quarterly results announcement to the Australia Securities Exchange (**ASX**);
- (c) release of the Company's half yearly results announcement to the ASX;
- (d) release of the Company's preliminary final results announcement to the ASX;  
or
- (e) release of a disclosure document offering securities in the Company.

(collectively "**Trading Windows**")

Dealings with the Company's securities by a Restricted Person outside the Trading Windows are strictly prohibited, except as a result of an exceptional circumstance as described in paragraphs 5.6 to 5.9 of this Policy.

The Company may at its discretion vary this rule in relation to a particular Trading Window by general announcement to all Restricted Persons either before or during the period.

However, if a Restricted Person is in possession of price sensitive information which is not generally available to the market, then he or she must not deal in the Company's securities at **any** time.

### 4.2 No short-term trading in the Company's securities

Restricted Persons should never engage in short-term trading of the Company's securities except for the exercise of options where the shares will be sold shortly thereafter.

### 4.3 Securities in other companies

Buying and selling securities of other companies with which the Company may be dealing with is prohibited where an individual possesses information which is not generally available to the market and is 'price sensitive'. For example, where an individual is aware that the Company is about to sign a major agreement with another company, they should not buy securities in either the Company or the other company.

#### 4.4 Exceptions

- (a) The ASX Listing Rules contemplate that there may be trading that can be excluded from the Company's Trading Policy and the Corporations Act provides a number of exemptions from the insider trading provisions, therefore Restricted Persons may at any time:
- (i) acquire ordinary shares in the Company by conversion of securities giving a right of conversion to ordinary shares;
  - (ii) acquire Company securities under a bonus issue made to all holders of securities of the same class;
  - (iii) acquire Company securities under a dividend reinvestment, or top-up plan that is available to all holders or securities of the same class;
  - (iv) acquire, or agree to acquire or exercise options under any Company Share Option Plan;
  - (v) withdraw ordinary shares in the Company held on behalf of the employee in an employee share plan where the withdrawal is permitted by the rules of that plan;
  - (vi) acquire ordinary shares in the Company as a result of the exercise of options held under an employee option scheme;
  - (vii) transfer securities of the Company already held into a superannuation fund or other saving scheme in which the restricted person is a beneficiary;
  - (viii) make an investment in, or trade in units of, a fund or other scheme (other than a scheme only investing in the securities of the Company) where the assets of the fund or other scheme are invested at the discretion of a third party;
  - (ix) where a Restricted Person is a trustee, trade in the securities of the Company by that trust provided the Restricted Person is not a beneficiary of the trust and any decision to trade during a prohibited period is taken by the other trustees or by the investment managers independently of the Restricted Person;
  - (x) undertake to accept, or accept, a takeover offer;
  - (xi) trade under an offer or invitation made to all or most of the security holders, such as, a rights issue, a security purchase plan, a dividend or distribution reinvestment plan and an equal access buy-back, where the plan that determines the timing and structure of the offer has been approved by the board. This includes decisions relating to whether or not to take up the entitlements and the sale of entitlements required to provide for the take up of the balance of entitlements under a renounceable pro rata issue;
  - (xii) dispose of securities of the Company resulting from a secured lender exercising their rights, for example, under a margin lending arrangement;

- (xiii) exercise (but not sell securities following exercise) an option or a right under an employee incentive scheme, or convert a convertible security, where the final date for the exercise of the option or right, or the conversion of the security, falls during a prohibited period and the Company has been in an exceptionally long prohibited period or the Company has had a number of consecutive prohibited periods and the restricted person could not reasonably have been expected to exercise it at a time when free to do so; or
- (xiv) trade under a non-discretionary trading plan for which prior written clearance has been provided in accordance with procedures set out in this Policy.

#### **4.5 Dealings by Restricted Persons in connection with share option plans**

As the Company has an active share option plan, for the avoidance of doubt:

- (a) Subject to clause 4.5(b)
  - (i) a Restricted Person may not provide the exercise price of options obtained under a Company share option plan by selling the shares acquired on the exercise of such options; and
  - (ii) if the exercise price of options is being provided by a margin loan or other form of lending arrangement then a Restricted Person cannot sell shares to avoid providing additional capital or security to the lender in the event of a decrease in the value of the shares,  
  
unless the sale of those shares occurs during a Trading Windows.
- (b) If a Restricted Person sells shares in the Company as contemplated in paragraphs 4.5(a)(i) or 4.5(a)(ii) during a Trading Window, at a time when that Restricted Person possessed price sensitive information, then the sale of such Company securities would be in breach of insider trading laws, even though the person's decision to sell was not influenced by the price sensitive information that the Restricted Person possessed and the Restricted Person may not have made a profit on the sale.
- (c) If Company securities are provided by a Restricted Person to a lender as security by way of mortgage or charge and a sale of those Company securities occurs under that mortgage or charge as a consequence of default this would not be in breach of the insider trading laws.

#### **4.6 Notification of periods when Restricted Persons can trade**

The Company Secretary's Department will endeavour to notify all Restricted Persons of the Trading Windows when they are permitted to buy or sell the Company's securities as set out in paragraph 4.1.

## 5. APPROVAL AND NOTIFICATION REQUIREMENTS

### 5.1 Approval Requirements – Directors

- (a) Any Director wishing to buy, sell or exercise rights in relation to the Company's securities must obtain the prior approval of the Chairman or the Board before doing so; or
- (b) If the Chairman wishes to buy, sell or exercise rights in relation to the Company's securities the Chairman must obtain the prior approval of the Board before doing so.

### 5.2 Approval Requirements – Key Management Personnel

- (a) Any Key Management Personnel wishing to buy, sell or exercise rights in relation to the Company's securities must obtain the prior written approval of the Chairman before doing so.
- (b) For the purpose of this policy, "**Key Management Personnel**" are defined as:
  - (i) any first line reports of the Chief Executive Officer and their direct reports; and
  - (ii) any other person designated by the Chairman as key management personnel on the basis that they have authority and responsibility for planning, directing and controlling the activities of the Company either directly or indirectly.

### 5.3 Requests and Approvals

- (a) Restricted Persons must allow a reasonable period of time for any request, pursuant to paragraphs 5.1 or 5.2, to be considered. Any request, undertaking or permission under this section 5 can be given by letter, facsimile, email or any other electronic means.
- (b) All requests to buy or sell securities must include the intended volume of securities to be purchased or sold and an estimated time frame for the sale or purchase.
- (c) Copies of written approvals must be forwarded to the Company Secretary prior to the approved purchase or sale transaction.

### 5.4 Notification

Any Restricted Person who (or through his or her Associates) buys, sells, or exercises rights in relation to Company securities and obtains approval under paragraphs 5.1 or 5.2 **must** notify the Company Secretary in writing of the details of the transaction within two (2) business days of the transaction occurring. This notification obligation operates at all times but does not apply to acquisitions of shares or options by employees made under employee share or option schemes, nor does it apply to the acquisition of shares as a result of the exercise of options under an employee option scheme.

### 5.5 Restricted Persons' sales of securities

Restricted Persons need to be mindful of the market perception associated with any sale of Company securities and possibly the ability of the market to absorb the volume of shares being sold. With this in mind, the management of the sale of any significant volume

of Company securities (i.e. a volume that would represent a volume in excess of 20% of the total securities held by the seller prior to the sale, or a volume to be sold that would be in excess of 10% of the average daily traded volume of the shares of the Company on the ASX for the preceding 20 trading days) by Restricted Persons needs to be discussed with the board and the Company's legal and financial advisers prior to the execution of any sale. These discussions need to be documented in the form of a file note, to be retained by the Company Secretary.

#### **5.6 Exemption from Trading Window restriction due to exceptional circumstance**

A Restricted Person who is not in possession of price sensitive information in relation to the Company, may be given prior written clearance by the Chairman (or in the case of a Director the Chairman, or in the case of the Chairman, the majority of all of the other members of the board) to sell or otherwise dispose of Company securities outside of a Trading Window where the person is in severe financial hardship or where there are exceptional circumstances as set out in this policy.

#### **5.7 Severe Financial Hardship or Exceptional Circumstances**

The determination of whether a Restricted Person is in severe financial hardship or suffering from an exceptional circumstance will be made by the Chairman, and the majority of the Board in the case of the Chairman.

A financial hardship or exceptional circumstances determination can only be made by examining all of the facts and if necessary obtaining independent verification of the facts from banks, accountants or other like institutions.

#### **5.8 Financial Hardship**

A Restricted Person may be in severe financial hardship if they have a pressing financial commitment that can not be satisfied other than by selling the securities of the Company.

In the interests of an expedient and informed determination by the Chief Executive Officer, Chairman or board of Directors, any application for an exemption allowing the sale of Company securities outside of the Trading Windows based on financial hardship must be made in writing, be accompanied by a statutory declaration stating all of the facts and be accompanied by copies of relevant supporting documentation, including contact details of the persons accountant, bank and other such independent institutions.

Any exemption, if issued, will be in writing and shall contain a specified time period during which the sale of securities can be made.

#### **5.9 Exceptional Circumstances**

Exceptional circumstances may apply to the disposal of Company securities by a Restricted Person if the person is required by a court order, a court enforceable undertaking for example in a bona fide family settlement, to transfer or sell securities of the Company or there is some other overriding legal or regulatory requirement to do so.

Any application for an exemption allowing the sale of Company securities outside of the Trading Windows based on exceptional circumstances must be made in writing and be accompanied by relevant court and/or supporting legal documentation.

Any exemption, if issued, will be in writing and shall contain a specified time period during which the sale of securities can be made.

## **6. ASX NOTIFICATION FOR DIRECTORS**

The ASX Listing Rules require the Company to notify the ASX within 5 business days after any dealing in securities of the Company (either personally or through an Associate) which results in a change in the relevant interests of a Director in the securities of the Company. The Company has made arrangements with each Director to ensure that the Director promptly discloses to the Company Secretary all the information required by the ASX.

## **7. EFFECT OF COMPLIANCE WITH THIS POLICY**

Compliance with these Guidelines for trading in the Company's securities does not absolve that individual from complying with the law, which must be the overriding consideration when trading in the Company's securities.

The Board takes the matter of dealing in the Company's securities by Restricted Persons seriously and expects full compliance with this Policy. Failure to comply with this Policy may result in termination or employment or other disciplinary action.

## **8. SHAREHOLDER COMMUNICATIONS POLICY**

### **Introduction**

Anteo Diagnostics Limited aims to respect shareholder rights through ensuring that all shareholders are informed of major developments affecting the Company through regular shareholder communication and ensuring that participation in general meetings is as easy as possible. The Shareholder Communications Policy conforms to Principle 6 of the ASX Corporate Governance Council's Corporate Governance Principles and Recommendations.

### **Provision of Written Information**

The Company's Annual Report is the major piece of written communication provided to shareholders each year. In addition to meeting all formal requirements, the Annual Report shall be:

**Informative** The report will contain information that assists shareholders to understand how the Company's financial results were achieved, the nature of the relationship between the Company and its employees and how the Company and its products interact with the community and with issues of contemporary importance

**Available** The report will be made easily available to shareholders and other stakeholders in a timely manner and through multiple channels

In accordance with the ASX Listing Rules, the Company adheres to the continuous disclosure requirements, and will promptly release to the Australian Stock Exchange all relevant communications (including release announcements, media releases, presentations, briefings and statements of importance).

### **Electronic Communications**

The Company's website will:

- Be updated to reflect any information released to the Australian Stock Exchange as soon as practicable after the event
- Be a repository for relevant documents including the Annual Report, media releases, company policies and similar documents

The Company will instigate procedures to allow delivery of information to shareholders through the use of e-mail.

### **Access to Directors, Management and Advisors**

Shareholders may at any time direct questions or requests for information to Directors or Company management through the Company's website, by contacting the Company Secretary or attending any general meeting of shareholders.

The Board's philosophy is to encourage full participation of shareholders at any general meeting to ensure a high level of accountability and identification with Anteo Diagnostics Limited's strategy and goals. At each General Meeting of the Company, shareholders will, through the Chairman, be given the opportunity to ask general questions of Directors. The external auditor attends the Annual General Meeting and is available to answer questions about the conduct of the audit and the preparation of the content of the Auditor's Report.

## **9. DIVERSITY POLICY**

### **Diversity vision**

Anteo Diagnostics recognises its talented and diverse workforce as a key competitive advantage. Our business success is a reflection of the quality and skill of our people.

Anteo Diagnostics is committed to seeking out and retaining the finest human talent to ensure top business growth and performance. Diversity management benefits individuals, teams, our company as a whole, and our customers. We recognise that each employee brings their own unique capabilities, experiences and characteristics to their work. We value such diversity at all levels of the company in all that we do.

Anteo Diagnostics believes in treating all people with respect and dignity. We strive to create and foster a supportive and understanding environment in which all individuals realise their maximum potential within the company, regardless of their differences. We are committed to employing the best people to do the best job possible. We recognise the importance of reflecting the diversity of our customers and markets in our workforce. The diverse capabilities that reside within our talented workforce, positions Anteo Diagnostics to anticipate and fulfil the needs of our diverse customers, both domestically and internationally, providing high quality products/services.

Anteo Diagnostics is diverse along many dimensions. Our diversity encompasses differences in ethnicity, gender, language, age, sexual orientation, religion, socio-economic status, physical and mental ability, thinking styles, experience, and education. We believe that the wide array of perspectives that results from such diversity promotes innovation and business success. Managing diversity makes us more creative, flexible, productive and competitive.

### **Recruitment**

As a global player, Anteo Diagnostics recruits people from all around the globe. We believe that our employees from many different cultural, linguistic and national backgrounds provide us with valuable knowledge for understanding complex international markets. We have established outreach programmes to identify talented women and individuals from under-represented backgrounds for recruitment. We provide Visa support for promising young women and under-represented status students with the potential to become high achieving professionals in Anteo Diagnostics.

### **Career development and promotion**

Anteo Diagnostics rewards excellence and all employees are promoted on the basis of their performance. All managers are trained in managing diversity to ensure that employees are treated fairly and evaluated objectively.

All employees undergo diversity training. Diversity training encompasses raising awareness about issues surrounding diversity and developing diversity management skills.

Anteo Diagnostics provides a safe and pleasant environment for our employees. We offer:

- Flexible working time arrangements (including maternity and paternity leave)
- Employee education assistance
- Employee network and support groups
- Open communications
- Mentor programmes