



## 1. Purpose and Scope

### 1.1. Introduction

Service Stream is committed to maintaining a high standard of corporate governance through a culture of strong ethical behaviour consistent with our corporate values, and corporate compliance. Employees must fulfil their roles and responsibilities with honesty and integrity and in compliance with the law.

As part of this commitment, conflicts of interest need to be effectively managed at Service Stream. A failure to manage conflicts of interest can adversely affect Service Stream's interests and reputation and the interests and reputation of its Employees.

The purpose of this Policy is to outline the procedures for managing conflicts of interest.

### 1.2. Interaction between this Policy and other Service Stream Policies

This Policy should be read in conjunction with the following Service Stream policies:

- Code of Conduct
- Anti-Bribery and Corruption Policy
- Whistleblower Policy
- Securities Trading Policy

A copy of each of the aforementioned policies, including this Policy, is available on Service Stream's intranet and webpage.

Other documents such as the 'Potential Conflict of Interest Declaration Form' (Appendix 1) also apply to the management of conflicts of interest at Service Stream.

### 1.3. Who does this Policy apply to?

This Policy applies to all Service Stream directors, officers, employees (casual, temporary, part-time and permanent staff) and consultant contractors (each an "**Employee**").

Any non-compliance with this Policy, including failing to disclose interests in accordance with this Policy, may be regarded as serious misconduct. Employees may be subject to disciplinary action, which may include termination of employment or termination of engagement (as the case may be).

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Service Stream's Employees are required to comply with any lawful directions made by Service Stream in respect of this Policy. This Policy is not intended to be contractually binding and does not form part of any employment contract with Service Stream. Service Stream may amend this Policy at any time in its sole discretion.

## 2. Policy

### 2.1. The Policy

Employees **must not** engage in activities, hold interests or allow themselves to be in situations that involve, could potentially involve or could be perceived as involving a conflict between their personal interests and the interests of Service Stream.

Employees have an obligation to disclose any actual, perceived or potential conflict which may arise. Following the notification of a potential conflict in accordance with this Policy, approval may be given to the Employee to proceed or continue with an activity or relationship, subject to the circumstances of the conflict and its ability to be effectively managed. For further details, please refer to Section 3.

### 2.2. What is a conflict of interest?

A 'conflict of interest' is a situation which may prevent an Employee's duties, obligations or services from being provided in an independent or impartial manner. A conflict of interest can arise in a number of circumstances, including where the interests of Employees are different to, and conflict with, the interests of Service Stream.

Conflicts of interest may be actual, perceived or potential. They may arise by having family connections, personal associations or relationships with suppliers, clients or other third parties which may influence or prejudice the obligations owed to Service Stream or a client, including in a conflict of duty situation.

Some examples of possible conflicts of interests include:

- where an Employee, or a person associated with an Employee, is likely to make a financial gain, or avoid a financial loss, at the expense of Service Stream or a client;
- an Employee being involved with an organisation or subcontractor (including as a director, advisor or consultant) that has or may have a business relationship with Service Stream or be a supplier to Service Stream;
- an Employee engaging in additional employment with third parties which may result in an actual or perceived conflict of interest with Service Stream's business activities;

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- an Employee or their relative (including parent, spouse, de facto, child, sister, brother, cousin, niece, nephew, aunt, uncle etc.,) having a vested interest, of which the Employee is aware, in a competitor, customer or supplier of Service Stream;
- providing a friend with confidential information to assist them with tendering for a services contract;
- being involved in a decision to award a services contract to a friend or family member or a company that they work for; or
- being in a close personal relationship with an Employee where there is a position of influence.

Where it is unclear whether a matter constitutes a conflict of interest, advice should be promptly sought from a member of the Compliance Team at [compliance@servicestream.com.au](mailto:compliance@servicestream.com.au).

## 3. Notification and Management of Conflicts of Interest

### 3.1. Training on conflicts of interests

All Employees are required to understand and identify actual, potential or perceived conflicts of interest and how they may arise as part of their role at Service Stream. To assist with this, online training will be made available to Employees to support this Policy.

### 3.2. Avoiding, Managing and Notifying a Conflict of Interest

#### 3.2.1. Avoiding conflicts of interest

Employees must avoid any actual, perceived or potential conflict of interest which may arise as part of their role at Service Stream. This includes ensuring that:

1. their personal, financial or professional interests or personal relationships with third parties, clients or suppliers do not influence or prejudice their obligations to Service Stream or any of its clients;
2. they do not improperly use their position or information obtained from their position to gain an advantage (or avoid disadvantage) for themselves or another person or an associated entity; and
3. they exercise their powers and discharge their duties to Service Stream in good faith and in the best interests of Service Stream.

#### 3.2.2. Notification of conflict of interest

If a potential conflict of interest cannot be avoided, then Employees are required to declare the relevant potential conflict prior to starting the activity or, in the case of prospective employees, during the application and recruitment process. Where a relevant potential conflict arises, it must immediately be fully disclosed to the Employee's manager and the Compliance Office, via the Potential Conflict of Interest Declaration Form

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(Annexure 1 and available online [here](#)). The disclosure will remain confidential and only be disclosed to Executive Management and the Audit & Risk Committee as required.

For any Employee that does not have online access to the Form, they may print off a PDF version of the Potential Conflict of Interest Declaration Form (Appendix 1) and complete and return it to the Compliance Officer at [compliance@servicestream.com.au](mailto:compliance@servicestream.com.au) for inclusion in the Potential Conflicts of Interest Register.

In addition to their obligations under this Policy, directors are required to disclose any potential conflicts in accordance with the *Corporations Act (Cth) 2001* (which, if applicable, may be a standing notice) so that other directors have notice of the potential conflict.

### 3.2.3. Outcome of notification of conflict of interest

Following the notification of a potential conflict, the Compliance Officer (or their delegate) will inform the Employee or prospective employee within 10 business days of the outcome. Disclosures may be escalated to the relevant Executive Leadership Team member for decision in consultation with the Managing Director.

Potential outcomes may include:

- The prospective employee may not be permitted to commence employment or engagement with Service Stream.
- Employee receiving permission to proceed or continue with the activity in accordance with relevant Service Stream policies and employment obligations.
- Employee being required to alter or cease their involvement with the activity.
- Employee being required to remove themselves from a particular decision-making process or business transaction.

In determining the appropriate outcome, Service Stream will take all relevant matters into account, including:

- The size of the activity or interest (from a commercial and/or time commitment perspective).
- Whether the Employee plays an 'active' role in the activity.
- Whether the activity interferes with the employee's ability to fully and diligently perform their work duties, including the risk of the Employee devoting company time and assets to the activity.

### 3.2.4. Where conflicts of interest cannot be avoided

Employees who are permitted to proceed or continue with an activity or relationship following notification of their conflict of interest in accordance with this Policy, must adhere to Service Stream's confidentiality and employment obligations at all times, as well as any and all conditions notified to the Employee by the Compliance Officer (or their delegate) in accordance with Section 3.2.3.

The Employee and responsible manager must ensure that all notified controls are adhered to and ensure that there are arrangements in place to reduce the impact of the conflict or potential conflict.

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## 3.2.5. Escalation of conflicts of interest

If any Employee has reason to believe that the conduct of another Employee is or may be perceived to be in conflict with the interests of Service Stream or a client, that Employee must promptly notify their manager.

## 3.2.6. Recording of the conflict in the Potential Conflicts of Interest Register

The Compliance Team will maintain a Potential Conflicts of Interest Register and promptly record a disclosed conflict and the procedures to manage the conflict in the register. The Potential Conflicts of Interest Register and the procedures to manage the identified conflict will be reviewed annually by the Senior Internal Auditor.

## 4. Breaches of Policy

Breaches of this Policy are a breach of Service Stream's Code of Conduct and can lead to disciplinary action, including dismissal. Some breaches may also result in additional legal proceedings being taken by Service Stream or a regulator.

Breaches of this Policy are to be promptly escalated to the Compliance Officer by any Employee that becomes aware of the breach. The Compliance Officer will then report any material breaches of this Policy to the Audit and Risk Committee.

## 5. Records

Records of conflicts identified in relation to Service Stream and decisions and actions taken in accordance with this Policy (including the Potential Conflicts of Interest Register) will be held in accordance with the Australian Privacy Principles.

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## Appendix 1

### Potential Conflict of Interest Declaration Form

In accordance with Service Stream's Conflict of Interest Policy an employee must:

- take reasonable steps to avoid any conflict of interest (real or apparent) in connection with the employee's employment; and
- disclose details of any interest of the employee in connection with the employee's Service Stream employment.

Please refer to the Conflict of Interest Policy for further details.

#### A. Employee declaration of material personal interests

Please list any personal interests<sup>1</sup> which are required to be disclosed in accordance with Service Stream's Conflicts of Interest Policy.

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<sup>1</sup> Please refer to section 2.2 and Annexure 2 of the Conflicts of Interest Policy for examples of potential interest which may give rise to a conflict of interest.

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Click or tap here to enter text.

## Employee Declaration

I declare that the above information is true and correct to the best of my knowledge and I confirm that:

- I have discussed the matter with my manager and disclosed all relevant information
- I will comply with Service Stream's Conflicts of Interest Policy and all notified controls in relation to the actual, potential or perceived conflict of interest
- I will keep my manager informed of any changes to the above circumstances and reconfirm my position annually
- The approval of a potential conflict of interest does not permit me to act in a manner which gives rise to an actual or perceived conflict of interest

<b>Signature</b>		<b>Date</b>	Click or tap to enter a date.
<b>Employee Name</b>	Click or tap here to enter text.	<b>Manager Name</b>	Click or tap here to enter text.