

Conflict of Interest Policy

1. Purpose

- 1.1 This policy has been developed to outline the management and process for identifying, disclosing, and managing conflicts of interest at ServiceFM.
- 1.2 ServiceFM values openness and promotes transparency in processes, procedures and decision-making and emphasises consistency, fairness, and probity as integral to our relationships, individual and collective, with all stakeholders.
- 1.3 This policy is supported by and is to read in conjunction with the [Conflict of Interest Procedure](#).

2. Scope

- 2.1 This policy applies to all ServiceFM employees, workplaces, and work activities.

3. Policy Statement

- 3.1 ServiceFM is committed to ensuring the highest-level integrity and ethics. Our company recognises that a well-established system for identifying, disclosing, and managing conflicts of interest increases its accountability and reduces the risk of corruption, misconduct and bias in its operations and decision-making processes.
- 3.2 Conflicts of interest are not wrong in themselves, cannot always be avoided, and the potential for a conflict of interest exists in all aspects of ServiceFM business operations and commercial activity. Conflicts may be actual, potential, or perceived by others.

4. Principles

- 4.1 Activities that have the potential to cause a conflict of interest include, but are not limited to:
 - Holding a substantial financial interest in any company (e.g., suppliers, customers etc.) That has dealings with ServiceFM
 - The acceptance by an employee from any party or supplier of goods and/or services, either directly or indirectly, of cash payments, goods, services, loans (except from banks or other financial institutions), or discounts that are not generally available to all employees
 - The acceptance by an employee, either directly or indirectly, of any gifts, gratuities, or services in kind from any party that is involved, or is attempting to be involved with ServiceFM
 - The ownership by an employee or a member of an employee's family, in any proportion, of land and/or other assets, either directly or indirectly that is the subject, or potential subject, of business dealings with ServiceFM
 - Engaging in nepotism, by the offer of employment to a member of an employee's family, especially where the family ServiceFM would be involved in a direct reporting relationship

- A personal relationship with another employee, including familial, sexual, or financial, where there is a potential for, or a perception that a conflict of interest could exist where there is a possibility that a decision may be biased in favour of, or against a person with whom there is a personal relationship
 - Engaging in outside employment (including self-employment or carrying on a business) where such employment will, or has the potential to:
 - Impact on the employee's ability to perform their normal functions
 - Create a conflict of interest
 - Compromise the confidentiality of the company
 - All dealings between employees of ServiceFM and ServiceFM of their families.
- 4.2 ServiceFM has a responsibility to ensure that its official activities and those of its employees conform to acceptable standards of integrity and good conduct. The ServiceFM expects:
- All employees to act with honesty and integrity
 - Employees will not allow their external, personal, or financial interests or their duties to any external entity to compromise their duties, obligations, and responsibilities to the ServiceFM
 - All conflicts of interest, regardless of their character or level, will be identified, disclosed, and managed
 - Any gifts, benefits, sponsorship, hospitality, or service will not be accepted if the intention is to influence current or future behaviour of an individual within ServiceFM
 - Where a conflict of interest occurs, the interests of ServiceFM will be balanced against the interests of the employee. Unless exceptional circumstances exist, the balance of interests will be resolved in ServiceFM's favour
- 4.3 Managers, when notified of a conflict of interest, will deal promptly with the conflict as per this policy and the [Conflict of Interest Procedure](#) and put in place arrangements that protect the integrity of the ServiceFM's processes and decision-making.

5. Feedback

Feedback about this document can be emailed to compliance@servicefm.com.au

6. Endorsement

- 6.1 This policy is authorised, supported, and approved by:



James Pollock – Chief Executive Officer

Date: 01/04/2021