

Document Profile

Title	Conflict of Interest
Type	Policy
Division	Corporate
BU/Dept.	All
Branch	All
Intended for	All personnel

Application

This Conflict of Interests Policy (**Policy**) applies to all employees of Certis Security Australia Pty Ltd and its subsidiaries (hereinafter collectively “Certis Security Australia”).

Certis Security Australia employees are required to comply with Certis Security Australia policies and procedures which may be changed, replaced or amended from time to time.

Objective

The objectives of this Policy are to communicate:

- Certis Security Australia’s approach to conflicts of interest; and
- The general standards of conduct expected of all staff and associates in relation to conflicts.

The procedures which support this Policy detail how actual, potential and perceived conflicts are to be identified and managed effectively.

This Policy should be read in conjunction with the Annual Disclosure Form.

Policy

Employees owe obligations of good faith, confidentiality and loyalty of service to Certis Security Australia.

Employees must not:

- Allow their interests, whether external, personal or financial, to come into actual, potential or perceived conflict with their duties to Certis Security Australia; or
- Allow their duties to any other entity to come into actual, potential or perceived conflict with their duties to Certis Security Australia.

Employees are not permitted to undertake any other employment, whether paid or unpaid, or engage in any other business (including with security company sub-contractors) which may adversely affect the performance of their duties, functions and responsibilities or conflict with the interests of Certis Security Australia, without the prior written approval of Certis Security Australia.

Where an employee believes that a conflict of interest could arise, or could be perceived to arise, the employee must immediately report the issue to Certis Security Australia.

Conflict of Interest

Conflicts of interest exist when it is likely that an employee could be influenced (or perceived to be influenced) by a personal interest in carrying out their duties.

Where considered serious and in breach of an employee's obligations to Certis Security Australia, an employee may be required to relinquish the personal interest, or refrain from participating in the activity that is related to the conflict of interest.

Examples of conduct and/or situations that may give rise to a conflict of interest include, but are not limited to, the following examples:

- having a financial interest in a competitor of Certis Security Australia;
- having a financial interest in a company that may be a supplier, customer or contractor of goods and / or services to / from Certis Security Australia;
- engaging in business for, or employment (including as a director) / engagement by, another company that is in any way competitive with, or in conflict with, any activity or objective of Certis Security Australia; engaging in business for, or employment (including as a director) / engagement by, a company or individual that is a supplier, customer or contractor of goods and / or services to / from Certis Security Australia;
- engaging in any outside business, or employment/engagement by a company other than Certis Security Australia, that could interfere with the proper performance of your responsibilities to Certis Security Australia;
- lending money to, or borrowing money from, any customer, supplier or contractor of Certis Security Australia;
- accepting gifts, benefits or hospitality in connection with work for Certis Security Australia; and
- disclosure to third parties of any financial or other confidential information or knowledge about the affairs of Certis Security Australia, including any information acquired or originated during employment with Certis Security Australia.

Disclosure

Identified employees are required to complete an Annual Disclosure Form, or at any time as directed by Certis Security Australia.

The Annual Disclosure Form requires employees to disclose details of their own, their family members' or family trust's involvement in investments, loans, contracts, business transactions and / or outside directorships in companies and / or businesses that are suppliers, customers and/or competitors to Certis Security Australia.

Any employment of related persons must also be disclosed. Related persons includes your spouse, partner, child(ren) (both natural and adopted), siblings, offspring of siblings, parents, parents-in-law, brother(s)/sister(s)-in-law and son(s)/daughter(s)-in-law.



Conflict of Interest Policy

Breach of this policy

Failure to fully disclose information about conflicts may constitute misconduct and result in disciplinary action being taken.

Failure to fully disclose and appropriately manage a conflict may also be regarded as corrupt conduct.