

# CONFLICT OF INTEREST POLICY

## Intent & Purpose

Springmount Services shares responsibility with its team members and consultants for creating and maintaining the Company's professional reputation and work ethic including exhibiting acceptable levels of honesty and integrity, personal and professional presentation, fostering mutual respect in the workplace, co-operation and teamwork both internally and externally.

Springmount Services Conflicts of Interest Management Policy provides guidance for the management of conflicts of interest which arise in relation to the activities of the company and its representatives, staff and clients.

## Operation and Incidence

The Policy is intended to:

- Provide a framework to enable staff to identify actual, apparent and potential conflicts of interest that may arise wholly or partially in connection with the provision of cleaning and operational services
- Assist staff in determining how to most appropriately address those conflicts of interest
- Minimise the potential adverse impact of conflicts of interest on Springmount Services stakeholders.

With the objective that Springmount Services its representatives and staff provide cleaning and operational services efficiently, honestly, fairly and professionally at all times and maintain a reputation for integrity in the provision of cleaning and operational services.

What is required is that conflicts of interest are appropriately identified and managed. However, where a conflict cannot be adequately managed through controls and/or disclosure, Springmount Services must avoid the conflict or refrain from providing the affected cleaning and operational services.

The usual mechanisms used by Springmount Services to determine and manage conflicts of interest are:

- Identifying the conflict relating to cleaning and operational services;
- Assessing and evaluating the conflict;
- And then implementing one or more of the following responses to the conflict:
- Controlling the conflict;
- Avoiding the conflict; and/or
- Disclosing the conflict

### **Identifying and Assessing Conflicts Of Interest**

Before any management of conflicts of interest can be undertaken, those conflicts must first be identified and assessed. All staff is expected to be able to identify actual or potential conflicts of interest.

It is often difficult for staff who are directly involved in the provision of a cleaning and operational services to fully identify conflicts of interest. If a staff member suspects or is unsure in relation to any potential conflict of interest, they are expected to refer the matter to the National General Manager Operations in conjunction with the National Manager Risk & Compliance for consideration. The staff member will make available all information relevant to the consideration of whether a conflict of interest exists and the evaluation of that conflict.

In the event that a conflict of interest is identified, the level of materiality of that conflict must then be assessed. If a conflict has a low level of materiality, then little or no action may be required to address it. If the conflict is of an intermediate level, then it may be capable of being managed through controls and/or disclosure. If the conflict is of a serious nature, then the appropriate course is likely to be to avoid the conflict altogether.

### **Controlling Conflicts Of Interest**

Once a conflict of interest has been identified, an appropriate control must be applied so as to ensure that the quality of cleaning and operational services being provided is not compromised. Such controls may include:

Disclosing the conflict of interest;

- Avoiding the conflict by declining to provide the cleaning and operational services;
- Allocating another representative or representatives to provide the service; or
- Implementing appropriate protections to ensure that the service is provided by representatives who are partitioned from other staff, information and circumstances which give rise to the conflict.

The Chief Operating Officer together with the General Manager – Corporate Services will be primarily responsible for determining the appropriate controls to be applied to a conflict of interest.

In the event of serious conflicts of interest which are likely to have a material adverse effect on stakeholders and/or the quality of cleaning and operational services provided, the Chief Operating Officer is required to escalate the matter to the Managing Director.

### **Avoiding Conflicts of Interest**

Any conflicts which have a serious potential impact on Springmount Services and/or its stakeholder holders must be avoided. In such cases, an attempt to manage the conflict or to affect disclosure is likely to be an insufficient measure. The Chief Operating Officer is primarily responsible for determining whether a conflict of interest should be avoided and, if so, how to implement that determination.

### **Disclosing Conflicts of Interest**

Springmount Services and its staff need to ensure that stakeholders are adequately informed about any material conflicts of interest that may affect the provision of cleaning and operational services to them. This is achieved through disclosure of sufficient information relating to those conflicts. Such disclosure must be sufficiently detailed in a clear and effective manner so as to enable the clear understanding of the nature of the conflict and the extent to which it might affect the provision of cleaning and operational services. Such disclosure should:

- Be timely, so that it occurs before or when the cleaning and operational services is provided, but in any case at a time that allows a stakeholder a reasonable time to assess the effect of the conflict;
- Be in a form which is prominent, specific and meaningful to the stakeholder; and
- Refer to the specific service to which the conflict relates.

In each case where one or more actual or potential conflicts of interest are to be disclosed, the assessment of what disclosures are appropriate will depend on all the facts and circumstances, including the nature of the conflicts and the sophistication of the relevant stakeholders.

### **Subordinate documents**

Code of Conduct

### **RACI**

Responsible	It is the responsibility of the Executive Committee to implement, maintain and communicate this policy.
Accountable	The final authority for this policy lies with the Managing Director.
Consulted	When making changes to this policy, a consultation should be carried out with the leadership team.
Informed	All changes to this policy should be communicated to all leaders.

### **Breach of The Policy**

Breach of this policy may be regarded as misconduct, leading to disciplinary action which may result in termination of employment or engagement. An individual may also be exposed to criminal or civil liability for a breach of relevant legislation.