



## CONFLICTS OF INTEREST POLICY

### 1. COMMENCEMENT AND APPLICATION OF THIS POLICY

- 1.1 This Conflicts of Interest Policy ('Policy') commences operation from 1/3/2020 and replaces all previous Gateway Group (**Gateway Group**) policies pertaining to conflicts of interest.
- 1.2 The Policy applies to all employees, agents and contractors (including temporary contractors) of Gateway Group, collectively referred to as '**workplace participants**'.
- 1.3 The Policy does not form part of any employee's contract of employment. Nor does it form part of any other workplace participant's contract for services.
- 1.4 Gateway Group reserves the right to vary, replace or terminate this Policy from time to time.

### 2. WHAT IS A CONFLICT OF INTEREST?

A conflict of interest arises when a workplace participant has a '*secondary interest*' which could improperly influence the performance of the workplace participant's duties and responsibilities in their work for Gateway Group.

A '*secondary interest*' means anything that can have an actual or perceived impact or influence on the workplace participant, including the participant's:

own personal, professional or business interests; or

the personal, professional or business interests of individuals or groups with whom a workplace participant is closely associated (for instance, relatives, friends or even a rival).

Conflicts of interests can be 'actual' or 'perceived'

'Actual' conflicts of interests arise where a secondary interest actually improperly influences a workplace participant's performance or behaviour.

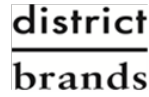
However, conflicts of interest may still arise even if a secondary interest does not actually influence a workplace participant's behaviour. For instance, a secondary interest that could create a *perception* that a workplace participant has been improperly influenced in their work also constitutes a conflict of interest.

*Example: You or one of your family members has an interest in a company with whom you are required to negotiate a contract on behalf of Gateway Group, for the provision of services. This would constitute (at the very least) a perceived conflict of interest.*

#### Improper use of position, information and assets

This Policy also prohibits workplace participants from using their position, information acquired in their position, or Gateway Group's assets to obtain a benefit or advantage for:

Document Title: Gateway Group Conflicts of Interest Policy			Authorised by: Joe Boumelhem	
Document #: POL004	Version #: 1	Issue Date: 1/3/2020	Revision Date: 1/3/2021	Page 1 of 3



themselves; or

for any other person.

**WHO IS RESPONSIBLE FOR MANAGING CONFLICTS OF INTEREST?**

Managing conflicts of interest is the shared responsibility of Gateway Group and workplace participants.

All workplace participants have a responsibility to ask themselves whether their actions or decisions could give rise to a real or perceived conflict of interest, and if so, to take action to manage that conflict.

**DECLARING A CONFLICT OF INTEREST**

Avoiding all conflicts of interest (real or perceived) is not always feasible. However, in all cases where a conflict of interest arises, the conflict should be openly and transparently declared.

A workplace participant should register or declare the actual or perceived conflict of interest to the workplace participant’s Business Owner.

**MANAGING A CONFLICT OF INTEREST**

**A supervisor or manager who receives a declaration regarding a conflict of interest must then determine how to respond to the conflict. Any response must be sufficient to ensure that Gateway Group can continue to:**

- perform its services in an impartial and professional manner;
- maintain the highest ethical standards; and
- deliver its services fairly, effectively and efficiently to customers.

Measures that can be adopted to minimise a conflict include:

**recruiting** third parties who do not have an interest (such as Human Resources or legal advisors) to advise on or participate in the matter;

**restricting** involvement of a workplace participant in matters in which they have (or are perceived to have) a conflict of interest;

**removing** the workplace participant from involvement in matters in which they have real or perceived conflicts of interest;

requiring the workplace participant to **relinquish** assets or other private interests in order to minimise the conflict; and

in rare circumstances, a workplace participant may need to **resign** from their employment or end their contract for services in order to appropriately minimise the conflict.

**IF IN DOUBT, DECLARE!**

If a workplace participant is ever under any doubt regarding whether a perceived or actual conflict of interest has arisen, the appropriate course of action is for the workplace participant to declare the conflict of interest.

Document Title: Gateway Group Conflicts of Interest Policy			Authorised by: Joe Boumelhem	
Document #: POL004	Version #: 1	Issue Date: 1/3/2020	Revision Date: 1/3/2021	Page 2 of 3



This serves to protect both the workplace participant and Gateway Group from any adverse consequences if an actual conflict of interest arises.

### 3. Breaches of this Policy

- 3.1 A failure to comply with the obligations contained in this Policy will lead to disciplinary action which may include, but is not limited to, termination of an employee's employment or a contractor's services.
- 3.2 Breaches of this Policy will be handled under Gateway Group's disciplinary policy.

### 4. VARIATIONS

- 4.1 Gateway Group *reserves the right to vary, replace or terminate this policy from time to time.*

Document Title: Gateway Group Conflicts of Interest Policy			Authorised by: Joe Boumelhem	
Document #: POL004	Version #: 1	Issue Date: 1/3/2020	Revision Date: 1/3/2021	Page 3 of 3