

A Conflict of interest is defined as "A conflict between the private interests and the official responsibilities of a person in a position of trust".

SKG Services has a fully documented conflict of interest policy which aims to both safeguard staff members in the performance of their duties as well as protect the interests of our Principals and Clients.

Where there is believed to be a conflict of interest between staff members and prospective or existing principals or clients, concern should be raised with the Operations Manager to review and inform the necessary people.

#### **Responsibilities of the Organisation**

1. The best interests of the company are paramount to other interests of third parties, individual stakeholders, General Managers, employees or associates.
2. SKG Services has the responsibility to comply with the legislation and intent of the codes of tendering.
3. To promote and protect the image and reputation with stakeholders, employees and the general public that SKG Services operates under ethical standards and sound business practices.
4. To avoid any dissent and unrest in decision-making through upfront publication of a transparent process to handle and record conflict of interest, the process will be concerned with major conflicts of interest of a material nature and this is, to some extent, a matter of judgment contingent upon whether the issue is of significant importance to the company.
5. Ensuring that SKG Services interest is not compromised should be the overriding objective of any conflict of interest management strategy. SKG Services is responsible for:
  - Establishing a system for identifying and managing conflicts of interest in the form of detailed policies and processes;
  - Building an organisational culture that supports implementation of all relevant policies through appropriate education, training and enforcement activities;
  - Reviewing relevant policies and processes on a regular basis to ensure they are effective;
  - Receiving and investigating complaints regarding possible breaches of conflict of interest policies;
  - Monitoring compliance with conflict of interest policies, including responses to alleged breaches.

#### **Responsibilities of the Managers**

The Managers:

- Shall not have a personal interest or engagement with a third party except with the fully informed consent of the company.
- Shall not misuse their position or knowledge within the company for personal or professional gain, profit or advantage except with the fully informed consent of the company.
- Shall not misappropriate the company's property or knowledge for their own or a third party's advantage or usage except with the fully informed consent of the company.
- Shall give notice of any material personal interest or involvement relating to any affairs of the company.

The Managers, or employees within the company able to make, influence or participate in decisions are responsible for:

- Complying with conflict of interest policies with respect to their own conflicts and potential conflicts of interest facilitating the compliance of those they supervise by:
  - Being aware of the risks of conflicts inherent in the work of the staff they manage;
  - Making staff aware of relevant policies and processes;

- Advising staff about appropriate ways to manage conflicts;
- Recording the receipt of disclosures of conflicts of interest reported to them by staff;
- Assisting with preparation of management strategies for staff who disclose conflicts of interest;
- Monitoring the work of staff and the risks to which they are exposed.

#### **Responsibilities of Employees**

Employees are responsible for:

- Being aware of their obligation to avoid conflicts of interest where possible, and manage those conflicts of interest that cannot be avoided;
- Assessing their private and personal interests, and whether they conflict, or have the potential to conflict, with their official duties;
- Disclosing conflicts of interest, they may have in accordance with specified procedures; and complying with the requirements of this general policy or related specific policies and procedures.

SKG Services has no desire to limit the involvement of employees in outside interests. However, it is crucial to ensure that outside interests do not lead to a conflict of interest with the commercial interests of SKG Services or make demands upon the employee's time and energy to the extent that it adversely affects their job performance.

#### **Procedure**

Any personal or business matter which is/or could lead to a conflict of interest must be declared at the earliest possible time to the General Manager and the Operations Manager (for managers and employees) who will advise the necessary people as soon as practicable.

For employees, the Operations Manager will decide if there is an actual conflict of interest and if it is of a material nature will inform the General Manager. All conflicts of interest involving the existing or prospective Clients will be referred to the General Manager for a determination about materiality.

All material declarations are to be recorded in a Register of Interests held by the Operations Manager.