



Group Conflicts of Interest Policy

Policy Level:	2
Accountable Executive:	Group Chief Financial Officer
Date Approved:	15 August 2019
Date Effective:	15 August 2019

auspost.com.au

Contents

Statement of Policy	3
Overview	3
Rationale & Scope	3
Application	3
Audience	4
Policy Principles	4
Awareness, Training & Induction	4
Enforcement & Monitoring	5
Breaches, Variations & Exemptions	5
Reporting	5
Review	5
Roles & Responsibilities	6
Policy Governance	6
Policy Operation	6
Policy Monitoring & Oversight	6
Glossary	7
Policy Administration	8
Key Policy Information	8
Policy Owners and Governance Forums	8
Key Dates	8

Statement of Policy

Overview

Our reputation, success and sustainability as an organisation depends on not only what we do, but how we do it. It is important for this reason that we always act with integrity and ensure we have transparency on our business relationships and assess the actual or perceived implications they may have on the overall success of the Australia Post Group.

The Group Conflicts of Interest Policy is our guide to help us do that.

Rationale & Scope

The Group Conflicts of Interest Policy (*the Policy*) sets out your obligations in relation to managing actual, perceived and potential conflicts of interest.

A conflict of interest exists when your independence and/or judgment in making commercial or business decisions is, or potentially could be, impaired due to your Personal Relationships, participation in external activities and/or interests in another commercial enterprise.

Actual, perceived or potential conflicts of interest may arise from activities and interactions outside of your work. These conflicts do not necessarily involve improper or corrupt conduct, but it is important to be aware of and respond to such activity. These conflicts of interest are defined as follows:

- **Actual conflicts of interest** occur when your decisions and actions at work are influenced by personal interests.
- **Perceived conflicts of interest** occur when others could reasonably infer that you could be influenced by personal interests in your work decisions and actions, regardless of reality.
- **Potential conflicts of interest** occur when existing personal interests may in the future affect your decisions and actions at work.

By adhering to the requirements set out in this Policy, we can better ensure our decision making is impartial, objective and free from competing self-interest, prejudice and favouritism. Maintaining adequate conflicts management arrangements ensures we are able to achieve our business objectives while operating efficiently, honestly and fairly.

This policy has a key relationship with the following policies:

- Group Anti-Bribery & Corruption Policy;
- Our Ethics;
- Group Fraud Policy;
- Group Political Donations Policy;
- Group Gifts, Benefits & Hospitality Policy;
- Group Corporate Responsibility Policy;
- Group Procurement Policy (with reference to Sustainable Procurement Principles, notably provisions relating to modern slavery); and
- Group Whistleblower Policy.

This policy is also based on industry standards, including ASIC's Regulatory Guide 181.

Application

The Policy applies to Australia Post Group (APG) and all of its workforce participants worldwide, who are defined as anyone who performs services for APG, or on its behalf, and includes:

- employees of any company in APG;

- contractors, consultants, licensees and agents (and their employees and subcontractors), who perform services for APG; and
- any other third parties performing services for or on behalf of APG.

APG means the Australian Postal Corporation, its domestic and foreign-owned subsidiaries, and all of its associated entities.

Audience

All of APG and its workforce participants.

Policy Principles

APG expects all our workforce participants to:

- avoid situations or actions that create actual, perceived or potential conflicts of interest, including situations that may interfere with exercising sound judgement. This includes personal interests outside of APG.
- inform and discuss with a manager, supervisor or other appropriate person whenever an actual, perceived or potential conflict of interest exists.
- make written disclosure of conflicts of interest in the Conflicts of Interest Register after consultation with their manager.
- in the case of a conflict of interest existing (or potentially existing), take reasonable steps to remove themselves from the scenario if it cannot be reasonably managed with other controls.
- avoid commercial decisions and decision-making processes that may generate personal gain, or gain for someone who you have a Personal Relationship with.
- avoid any business interest, outside activity, directorship or relationship (financial or otherwise), which might adversely affect sound judgment, the performance of their duties or services, and/or the brand/reputation of APG.
- act fairly and in the best interests of our customers to ensure products and services offered are fit-for-purpose, regardless of our incentives, and take all reasonable steps to ensure any actual, perceived and potential conflicts of interest are adequately addressed.
- ensure that recruitment and remuneration arrangements are robust and adequate due diligence is performed on our people to ensure sufficient control for conflicts of interest.
- maintain and consider strict information barriers and internal structures to only share commercially sensitive information when appropriate.

Awareness, Training & Induction

Here are some of the things we will do to keep this policy top of mind:

- we make this policy available on the intranet and to subsidiaries and associated entities.
- we provide training about your rights and responsibilities.
- we regularly remind you about your responsibilities under the Policy.

Enforcement & Monitoring

Management has accountability to enforce this policy and deal with intentional non-compliance through both performance management and disciplinary processes.

Management are also responsible for ensuring that training is completed and effectively communicating conflicts of interest obligations to their teams.

Depending on circumstance, Group Security may be engaged and/or government authorities. Group Compliance and Internal Audit can conduct periodic reviews to ensure ongoing policy compliance.

Breaches, Variations & Exemptions

Any behaviour that breaches this Policy will be managed through the applicable investigation and disciplinary processes. A proven breach may result in disciplinary action, up to and including termination. Individuals may also face further action from government authorities depending on circumstance.

APG may take action under its contracts with its workforce participants to enforce the policy and deal with breaches.

Any incidents or breaches in relation to this Policy must be disclosed in the Conflicts of Interest register, their manager and to the Compliance Manager for Ethical Behaviour.

Any request for variation or an exemption from this Policy must be made to the policy owner via the policy administrator. The standard procedures for requesting Policy Exemptions/Deviations must be followed in each case.

Reporting

Personal Conflicts of Interest

All of your own actual, perceived and potential conflicts of interest can be reported by notifying your immediate manager or supervisor in writing and making a written declaration on the Enterprise Conflicts of Interest register.

Conflicts of Interest relating to other parties

If you have concerns about an undisclosed conflict of interest relating to someone else, you can take the following steps:

- talk to your manager
- contact the Whistleblower hotline to speak anonymously (if preferred) to an independent, external service provider (as set out in the Group Whistleblower Policy and Our Ethics); or
- directly notifying the Compliance Manager for Ethical Behaviour.

In line with the principles and guidelines contained within the Group Whistleblower Policy, disclosures of actual or suspected conflicts of interest with reasonable grounds will be treated seriously. APG will support you to make a disclosure without fear of reprisal and with the protection of APG.

Review

The Group Conflicts of Interest Policy will be reviewed at least every three years, or whenever there is a change to the law or operating environment to ensure it is up to date.

Roles & Responsibilities

Policy Governance

Requirement	Responsible area/Role	Activities
Oversight on the implementation of governance frameworks	Audit & Risk Committee (ARC)	The ARC will ensure appropriate governance mechanisms and control frameworks are in place overall.
Accountable Executive	Group Chief Financial Officer	Delegates day-to-day governance and responsibility to the Chief Risk Officer who oversees the application of the Policy.

Policy Operation

Requirement	Responsible area/Role	Activities
Facilitation of appropriate responses to any conflicts of interest	Managers	Make appropriate decisions, and ensure Group Compliance is notified via the Conflicts of Interest register as required.
Make timely, documented disclosures of actual or potential conflicts of interest	Workforce Participants	Provide written documentation to their manager of any actual or potential conflicts of interest.
Comply with regulatory obligations, policies and procedures. Undertake relevant training.	Workforce Participants	Complying with regulatory obligations, APG policies and procedures relevant to their work responsibilities.

Policy Monitoring & Oversight

Requirement	Responsible area/Role	Activities
Compliance	Group Compliance	Oversee and ensure APG compliance to the principles of the policy.
Breach & Incident Reporting	Group Compliance	Undertake remediation and reporting for related matters to the Enterprise Risk Council & Business Unit Risk Councils as required.
Periodic review	Group Compliance	Option to undertake periodic reviews.
Periodic internal audit for compliance to the policy	Internal Audit	Option to undertake internal audits to determine level of compliance with the Policy, and ensure Breaches and Incidents are realised and reported appropriately.

Glossary

Term	Definition
APG	Australia Post Group (APG). The APG is defined as the Australian Postal Corporation and its domestic and foreign-owned subsidiaries.
Conflict of Interest	An instance when your independence and/or judgment in making commercial or business decisions is, or potentially could be, impaired due to your personal relationships, participation in external activities and/or interests in another commercial enterprise.
External Activity	An activity or interest that an individual has outside of their work at Australia Post Group.
Personal Relationship	Personal Relationships are defined as relationships which extend beyond professional relations, based on factors irrelevant to the working arrangements of staff. Personal relationships include: <ul style="list-style-type: none">a) family relationships (siblings, parent/child, husband/wife, de facto spouses, partner, cousins, relations by marriage such as brother- or sister-in-law);b) emotional relationships (including sexual relationships and close friendships);c) financial relationships (commercial relationships where pecuniary interest is present).

Classification: Internal

Policy Administration

Key Policy Information

Administrative Area	Policy Information
Document Title	Group Conflicts of Interest Policy
Policy Level	2
Version No	1.3

Policy Owners and Governance Forums

Administrative Area	Owner / Forum
Accountable Executive	Group Chief Financial Officer
Policy Owner	Chief Risk Officer
Policy Administrator	General Manager – Compliance
Policy Content Owner	Compliance Manager – Ethical Behaviour
Review and Approval Body	Group Chief Financial Officer

Key Dates

Administrative Area	Date
Policy Approval Date	15 August 2019
Policy Effective Date	15 August 2019
Next scheduled review	July 2022