

# Anti-Bribery and Corruption Policy

Service Stream



## 1. Overview

Service Stream is committed to minimising the risk of fraud and corruption through responsible corporate governance, ensuring that it has appropriate internal controls in place to promote compliance with anti-bribery and corruption laws in Australia where it conducts business. The Service Stream Board of Directors have endorsed this Anti-Bribery and Corruption Policy to support the Service Stream Code of Conduct and Corporate Governance Statement.

Service Stream recognises the financial performance and reputation of the Company is impacted by the actions of the Company, Directors, employees, subcontractors, suppliers and other third parties. Service Stream seeks relationships with parties that share the Company's commitment to lawful business practice conducted to a high standard of ethical behaviour and conduct.

## 2. Policy Statement

Service Stream has a zero tolerance to any form of bribery and corruption. Service Stream seeks to create a culture and operating environment whereby our employees and other parties do not engage in corrupt business practices. Key operating practices underpinning this objective include:

- **Due Diligence** is conducted on parties who are doing business with Service Stream and they are reputable, competent and qualified to do the work
- **Legal assurance** that any proposed arrangement complies with all applicable laws
- There is no unmanaged **conflict of interest**, actual or perceived, that would make any engagement inappropriate
- The party doing business with Service Stream **understands Service Stream's expectations**, its Code of Conduct and this policy
- The provision of **gifts or benefits** to public officials, politicians or political parties, or relatives or associates of public officials, politicians or political parties is prohibited
- Gifts to non-government related entities should be token in nature
- The giving, receiving, offering or promising of a **bribe, facilitation payment or secret commission** are expressly prohibited
- **Immediate reporting** of any actual or suspected instance of bribery corruption to management.

Bribery and Corruption are both illegal in all Australian jurisdictions and is a serious offence. Even the perception that bribery or corruption has occurred could have large, negative reputational and financial impact on Service Stream. Service Stream has a zero tolerance to any form of bribery and corruption.

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## 3. Scope

This policy extends to all employees, directors and third parties including subcontractors. Training and awareness programs are conducted across the group and all senior managers are committed to supporting this policy.

Any breaches of this Policy must be reported to the Board.

## 4. Definitions

Bribery is the offering or making of a payment of value either directly or indirectly to influence a person's decision making, to secure an unfair advantage or to enter a dishonest arrangement.

Corruption is the abuse of a position or trust to gain an unfair advantage.

### 4.1. Conflicts of Interest

A 'conflict of interest' is a situation which may prevent an employee's duties, obligations or services from being provided in an independent or impartial manner. A conflict of interest can arise in a number of circumstances, including where the interests of employees are different to, and conflict with, the interests of Service Stream.

Conflicts of interest may be actual, perceived or potential. They may arise by having family connections, personal associations or relationships with suppliers, clients or other third parties which may influence or prejudice the obligations owed to Service Stream or a client, including in a conflict of duty situation. Service Stream has a dedicated [Conflicts of Interest Policy](#) located on the Service Stream Intranet.

### 4.2. Gifts and Benefits

The giving or receiving of gifts and benefits may create an actual or perceived obligation or influence on the receiver doing their duties in with impartiality. This could result in both financial and reputation loss for Service Stream. As such, Service Stream prohibits the giving and receiving of gifts and benefit to public officials, politicians or political parties, or relatives and associates of public officials, politicians or political parties. The giving and receiving of gifts with non-government related entities should be token in nature (e.g. provision of refreshments for a meeting). Gifts are considered token if they are valued at under \$200, if it is not a monetary/financial gift or benefit, or a gift or benefit being offered on a regular basis (defined as being on more than two occasions within in a three-month period). Written approval from one level above your manager is required for the giving or accepting of non-token gifts. These are to be reported to Compliance ([compliance@servicestream.com.au](mailto:compliance@servicestream.com.au)) to be recorded and monitored in the Gifts and Benefits' Register.

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## 4.3. Facilitation payments and Secret Commissions

Facilitation payments are customary, unofficial minor payments to secure or speed a routine government action. These payments may be legal in some circumstance but are generally difficult to distinguish from a bribe. As such, offering or making a Facilitation Payment of any kind is prohibited by Service Stream, regardless of the provisions of applicable law. Additionally, Service Stream prohibits the use of a third party to make facilitation payments on our behalf.

Secret Commissions are payments made to influence an outcome or gain advance and are indistinguishable from corruption in law. Service Stream has a zero tolerance to the payment of a secret commission or the use of a third party to pay a secret commission on our behalf.

## 5. Violations of Policy

A violation of this policy may result in disciplinary action including the termination of employment or engagement. A breach of this policy may also represent a breach of legislation and result in legal or regulatory action including criminal charges, revocation of licenses, reputation damage and financial loss to the employee, the Group or the third party.

## 6. Reporting violations

Where an employee knows or suspects that there have been breaches of this policy, they should raise their concern with their immediate manager/ supervisor at first instance. However, where an employee feels uncomfortable in raising a concern in this manner or is unsatisfied with the response received, the concern can be raised as outlined below.

Inappropriate conduct can be referred to Service Stream's Whistleblower hotline '**Stopline**' using the information detailed below, and strict confidentiality will be maintained:

**Phone:** 1300 30 45 50

**Email:** <https://servicestream.stoplinereport.com/>