

Anti-Bribery and Corruption Policy

Service Stream



1. Overview

Service Stream is committed to minimising the risk of fraud, bribery 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 approach to any form of bribery and corruption.

Service Stream seeks to create a culture and operating environment whereby our employees, and other parties that we do business through, do not engage in bribery or 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 business 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 other benefits** to public officials or political parties, or relatives or associates of public officials or political parties is prohibited
- Gifts or other benefits to all other third parties should be token in nature
- The giving, receiving, offering, authorising or promising of a **bribe, facilitation payment or secret commission** are expressly prohibited
- **Immediate reporting** of any actual or suspected instance of bribery or corruption to management and Legal & Group Risk.

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Bribery and corruption are both illegal in all Australian jurisdictions and are serious offences. Even the perception that bribery or corruption has occurred could have large, negative reputational and financial impact on Service Stream.

3. Scope

This policy applies to all entities within the Service Stream group, including subsidiaries and controlled entities (together, the **Group**). This policy extends to all Group employees, directors, officers and third parties (including subcontractors, agents or other parties performing services on behalf of the Group) .

Training and awareness programs are conducted across the group and all senior managers are committed to supporting this policy.

4. Definitions

Bribes are a benefit of any value (whether tangible or intangible) offered, promised or provided to gain any improper business, commercial, contractual, regulatory or personal advantage and can take the form of gifts, hospitality, entertainment, fees, rewards, charitable donations or other advantages. A bribe may not always be of large value and is not limited to payments of money.

Bribery is the offering, promising, authorising, giving, accepting, soliciting or making of a bribe, either directly or indirectly, to influence the decision making of a public official or commercial party (in their personal or official capacity), to obtain or retain business or personal advantage or to enter a dishonest arrangement.

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

Public officials include employees, officials or contractors of government, government bodies (including military and police) or government-controlled companies; members of the executive, legislature or judiciary; statutory officeholders; public international organisation employees and contractors; and politicians (including candidates for office).

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

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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, Entertainment and Hospitality

The giving or receiving of gifts, entertainment, hospitality and other 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.

In dealings with public officials or political parties, Service Stream prohibits the giving and receiving of gifts, entertainment, hospitality or any other benefits.

In dealings with all other third parties:

- The giving and receiving of gifts, entertainment and hospitality should be token in nature and for a legitimate business purpose only (e.g. provision of refreshments for a meeting).
- You should never accept or give gifts, entertainment, hospitality or other benefits valued above \$200 without the written approval of one level above your manager / Compliance (compliance@servicestream.com.au).
- You should not accept any benefits on a recurring basis (defined as being on more than two occasions within a three-month period) or broken down into parts of less than \$200 without prior written approval from Compliance.
- All gifts, entertainment, hospitality or other benefits valued above \$200 must be reported to Compliance (compliance@servicestream.com.au) to be recorded and monitored in the Gifts and Benefits Register.

4.3. Facilitation payments and secret commissions

Facilitation payments are customary, unofficial minor payments to secure or speed a routine government action. These payments 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 secret payments, gifts or other benefits that are offered or given (typically as an inducement) to an agent or representative of another person, which is not appropriately disclosed to that other person. They are typically made to influence an outcome or gain advantage and are indistinguishable from corruption in law. Service Stream prohibits secret commissions or the use of a third party to offer, promise, accept or authorise a secret commission on our behalf.

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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 should be raised as outlined below.

Any person who knows or suspects that there has been a breach of this policy can refer the matter 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/>

7. Review of this policy

This policy will be reviewed annually by the Service Stream Board to ensure it is operating effectively and to assess whether updates are required.