

# Conflict of Interest Policy



## Purpose

We understand that you may have interests outside of your work at The Lottery Corporation. It's your responsibility to ensure these interests don't create a conflict with The Lottery Corporation's interests. This policy sets out what you're expected to do to identify, report and avoid an actual or apparent conflict between your personal interests and The Lottery Corporation's interests.

## Who this policy applies to

This policy applies to everyone who works at or for The Lottery Corporation, including all employees and contractors (**team members**).

## What is a conflict of interest?

A conflict of interest arises when your personal interests do, or appear to, compromise or influence business behaviour, performance or decision-making in your work with The Lottery Corporation. The appearance or perception of a conflict of interest can be just as significant as an actual conflict.

Personal interests can affect The Lottery Corporation's interests in a range of situations. Some examples include:

- **personal relationships** - with a relative, friend, spouse or partner, a person with whom you have a financial interest (such as a business partner), a creditor or someone you've conflicted with; and
- **personal gain** – through using or disclosing The Lottery Corporation information, using The Lottery Corporation's resources, intellectual property or confidential information, or accepting or offering gifts or hospitality (including entertainment) in a way that conflicts with our anti-bribery and anti-corruption policy or our hospitality guidelines (see also our gift and hospitality register).

## What are my obligations?

You must identify, report and avoid actual and perceived conflicts of interest.

### 1. You must identify the conflict

You will usually be the first person aware of an actual, possible or perceived conflict between your interests and those of The Lottery Corporation. You're expected to assess whether there's any likelihood that your personal interests could, or could appear to, compromise or influence The Lottery Corporation's business behaviour, performance or decision-making.

### 2. You must report the conflict

Where you think there is or might be an actual or perceived conflict, even if you're confident the conflict can be avoided, you must immediately report the conflict to your manager. If you prefer, you can elect to report it to your General Manager or People and Culture partner instead of your line manager (you can make this choice in the form).

Once submitted, the details on the form will be reviewed and the nature of the conflict and ways it may be avoided will be considered for approval. The applicable People and Culture General Manager may be involved in this process. Approval of the form will be confirmation the approver is satisfied with the detail you have provided and that the conflict can be successfully avoided by the measures identified. They will contact you if they need to discuss the details of your situation or put in place additional

# Conflict of Interest Policy



measures to avoid the conflict. A record of the submission and the outcome will be maintained confidentially by People Services.

## 3. You must avoid the conflict

You must work with your manager and/or People and Culture partner to ensure the conflict of interest is avoided. This might, for example, involve changes to the way you work, your team structure, supervision or your duties, or you may be asked to dispose of or quarantine your personal interests. If anything changes in relation to the conflict or your ability to avoid it, you must report this change using the conflict of interest form.

## Examples of conflicts of interest

It isn't possible to anticipate every possible conflict situation. The following hypotheticals are just a few examples.

### 1. Hiring

Lisa works in the Talent Acquisition team in [People and Culture]. She notices that her brother has applied for a vacancy she's recruiting for. Lisa could give her brother an unfair advantage over the other applicants because of her knowledge of the job requirements and her input into the selection process. This means there's a conflict of interest. Lisa should avoid the conflict by notifying her manager and ensuring she doesn't become involved in the recruitment process for the position.

If Lisa doesn't notify her manager, and her brother is successful in the application simply because he is the best person for the job, there may still *appear* to be a conflict of interest. This perceived conflict of interest can be as problematic as an actual conflict of interest.

### 2. Business interests

Troy is an Administration Assistant in the Finance team. He has recently started a part-time business outside of work with his friend Michelle. Neither of them has a computer. Michelle knows Troy uses a computer at work and asks him if he could use the computer and The Lottery Corporation's email account to help run their business. Troy must decline this request as doing otherwise would result in a conflict between Troy's personal interests with his work interests. Troy shouldn't use The Lottery Corporation's time or resources for his own personal gain. Troy also needs to ensure his manager knows about these personal business activities to help ensure any actual or perceived conflicts can be appropriately managed.

### 3. Relationships

Heidi is a manager in the Technology team. She recently started dating Harry, a consultant in the same department. Heidi's duties as a manager include appraisal, performance management and supervision of consultants. She therefore has a responsibility to declare the potential conflict of interest to her manager who, together with the relevant General Manager and a People and Culture partner, can help ensure Heidi doesn't evaluate or directly supervise Harry's performance.

# Conflict of Interest Policy



## Is working a second job a conflict of interest?

Working a second job or running your own business could be a conflict of interest if not managed appropriately. You shouldn't engage in any other employment, paid or unpaid (including self-employment), that will or is likely to be a conflict of interest with your work at The Lottery Corporation or which may affect your work performance.

Full-time team members must obtain written approval from their manager and the relevant General Manager People and Culture before taking on any additional work outside of The Lottery Corporation.

## What happens if I breach this policy?

It's your responsibility to understand and comply with this policy and The Lottery Corporation treats non-compliance seriously. A team member found to have breached this policy may be subject to disciplinary action, including termination of employment or engagement.

## Policy control

<b>Current from</b>	Adopted by the Board on 3 March 2022 to take effect upon the company's admission to the Official List of ASX
<b>Replaces version dated</b>	N/A
<b>Review period</b>	Biennial
<b>Sponsor</b>	Chief People Officer
<b>Approved by</b>	Board