

CONFLICT OF INTEREST POLICY

This document outlines our policy for Conflicts of Interest, including additional scope that the policy applies to, where appropriate.

OUR PURPOSE

Our purpose is to:

- ❖ conduct our business operations and affairs with honesty and integrity, engage in ethical decision making, being legally compliant and acting consistently with good corporate governance and community standards.
- ❖ operate in an ethical manner by ensuring conflicts of interest are actively managed.
- ❖ ensure that all employees do not allow their external, personal or financial interests or their duties to any external entity compromise their duties, obligations and responsibilities to BUMA.

OUR OBJECTIVES

To achieve our purpose, we will:

- ❖ ensure all employees (including directors) are aware of their obligations concerning conflicts of interest.
- ❖ provide a mechanism for employees to declare any actual, perceived or potential conflict of interest.
- ❖ investigate and determine whether a conflict of interest arises, and identify any further actions required to address the conflict and prevent reoccurrence (where possible).
- ❖ ensure any conflict of interest declarations and investigations are fair, transparent, accountable, free from bias and confidential, to ensure privacy and prevent misuse of information.
- ❖ undertake regular reviews of this policy and the Standard to ensure effectiveness.
- ❖ maintain a record of all conflict of interest declarations and actions taken under this policy and the Standard.

These objectives are supported by the following documents:

- Conflict of Interest [Standard](#) and [Procedure](#)
- [Conflict of Interest Declaration and Management Form](#)
- [Code of Conduct Policy](#)
- [Anti-Bribery and Corruption Policy](#)
- [Speaking Up Policy](#)

BUMA does not tolerate victimisation or reprisals against persons who report suspected conflicts of interest. BUMA will ensure active protection of those reporting a conflict of interest.

Colin Gilligan

CEO BUMA Australia

Endorsed: 26 March 2024