

Personal Conflicts Policy



Purpose

We understand that you may have personal interests and roles or duties outside your work at The Lottery Corporation. It's your responsibility that these personal interests and roles or duties don't create a conflict which adversely affects The Lottery Corporation's interests.

This Policy sets out what you're expected to do to identify, report and manage an actual or perceived conflict between:

- a) Your personal interests and The Lottery Corporation's interests; and/or
- b) Your duty under your employment agreement with the Lottery Corporation; and/or
- c) A duty you may have to someone outside The Lottery Corporation such as a previous employer, a client, or another organisation.

It also sets out what you must do if a conflict (or potential or perceived conflict) is identified.

Who this policy applies to

This policy applies to everyone who works at or for The Lottery Corporation, including all non-executive directors, employees and contractors (**Team Members**).

What is a personal conflict?

A personal conflict happens when your interests, duties or responsibilities outside The Lottery Corporation could, or could appear to, affect your decisions or actions at work. Even if it only looks like a conflict, it can be just as important as an actual one.

Personal conflicts can adversely affect The Lottery Corporation's interests in a range of situations.

Some examples include:

Personal gain	Personal gain through the course of your employment, contractual engagement or appointment, using or disclosing The Lottery Corporation's 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).
Personal relationships	<p>A personal relationship 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 experienced conflict with.</p> <p>Having a personal relationship with someone you work with may be considered a conflict if:</p> <ul style="list-style-type: none">a) You are involved with the recruitment process which involves the other person; or

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	<p>b) You both work in the same immediate team; or</p> <p>c) There is any direct or indirect influence or supervisory capacity over another Team Member with whom you have a personal relationship outside of work.</p> <p>In these cases, it is unlikely there will be a satisfactory resolution to avoid this conflict, unless in relation to examples (b) and (c) one person can move teams (subject to business needs).</p> <p>More examples of where a personal relationship could create a conflict, such as when someone you are in a personal relationship with starts or works for a Conflicted Business, are discussed below.</p>
<p>Starting a business or having any form of duty, responsibility or financial interest in a business that sells the same or similar goods and services as The Lottery Corporation.</p>	<p>This includes but is not limited to:</p> <p>a) ownership or a financial interest in a newsagency, or any other retail outlet that sells or could sell the same or similar lottery goods and services; or</p> <p>b) ownership or a financial interest in a licensed venue or any other venue that sells or could sell the same or similar Keno goods and services,</p> <p>(together a “Conflicted Business”) except where that personal interest is owning a shareholding of less than 5% in an entity listed on the Australian Securities Exchange.</p> <p>This is an inherent personal conflict, and it is unlikely there will be a satisfactory resolution to avoid it.</p> <p>This also extends to personal relationships. For example, if a close friend or family member were to start a business or have any financial interest in a company that offers goods or services similar to those of The Lottery Corporation, it could create a conflict that we need to carefully manage.</p>
<p>Working for another business that sells the same or similar goods and services as The Lottery Corporation.</p>	<p>This is an inherent conflict, and it is unlikely there would be a satisfactory resolution to avoid this conflict.</p> <p>If someone with whom a Team Member has a personal relationship is working for another business that offers the same or similar goods and services as The Lottery Corporation, it could also create a conflict that we need to carefully manage.</p>
<p>Working a second job or running your own business which is unrelated to and distinctly different from any goods or services sold by The Lottery Corporation.</p>	<p>Working a second job, running your own business, taking on board appointments or entering further contractual arrangements as an independent contractor could present a personal conflict if not managed appropriately.</p>

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	Before taking on any external work or directorship, it's important for Team Members to discuss this with their people leader (for non-executive directors this would be with the Chairman) to assess any potential conflicts. Together, we can determine whether a formal Personal Conflict declaration is necessary.
If you have an existing relationship with a supplier/vendor, and your role involves potentially awarding work to them.	You must immediately declare the relationship.

What are my obligations?

You must identify and report actual, potential or perceived conflicts and manage those actual, potential or perceived conflicts to avoid causing harm to The Lottery Corporation's interests.

It's important for all conflicts, actual, potential or perceived, to be resolved efficiently and transparently, so that the impacts or potential impacts to The Lottery Corporation are minimised. The process for disclosing conflicts is outlined below.

1. You must identify the conflict

You will usually be the first person aware of an actual, potential or perceived conflict between your interests, role or duties and those of The Lottery Corporation.

You're expected to assess whether there's any likelihood that your personal interests or duty to someone other than The Lottery Corporation could, or could appear to, compromise or influence The Lottery Corporation's business behaviour, performance or decision-making, or your performance in your role with The Lottery Corporation.

2. You must report the conflict

Where you think there is or might be an actual, potential or perceived conflict, even if you're confident the conflict can be avoided or managed, you must immediately advise your People Leader of the potential conflict (for non-executive directors, this would be to the Chairman). You or your People Leader may seek advice from the relevant General Manager or the People Experience team.

A determination will be reached on whether a formal Personal Conflict declaration needs to be made. If it does;

- Team Members will need to complete a Personal Conflict form in MyOracle.
- Non-executive directors will need to declare the Personal Conflict in writing to the Company Secretariat.

Once you complete the Personal Conflict declaration, it will be reviewed and the nature of the conflict and ways it may be avoided or managed will be considered.

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3. You must follow lawful and reasonable directions

You must work with your People Leader to ensure the conflict is managed in a way that avoids harm to The Lottery Corporation's interests.

This might, for example, involve changes to the way you work, your team structure, supervision, or your duties. If the business issues you with a directive regarding an action to be taken, by you, about a conflict, you must do as the business directs. Failure to do so may result in a breach of this Policy.

Potential outcomes

Outcomes to be expected when reporting an actual, perceived or potential conflict include:

1. Approval of the Personal Conflict. This 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.
2. The approver may contact you again, even after approving the measures to successfully avoid or manage the conflict. This will be done if they need to discuss putting in place any additional measures to prevent the conflict adversely affecting The Lottery Corporation.
3. A decision that there are no reasonable measures available to manage the conflict successfully, and you will be asked to dispose of or quarantine your personal interests or duties. This may include a directive not to obtain an interest in, or not be a director of a company with an interest in, a Conflicted Business

You are also required to report if anything changes in relation to the conflict or your ability to avoid it.

What happens if I breach this policy?

It is your responsibility to understand and comply with this Policy. The Lottery Corporation treats non-compliance seriously.

Failure to:

- (a) report a real, potential or perceived conflict; and/or
- (b) adhere to the reasonable measures required, as part of any approval of a conflict; or
- (c) quarantine or dispose of a conflict that cannot be successfully managed with reasonable measures,

is considered a breach of this policy.

A Team Member found to have breached this Policy may be subject to disciplinary action, including termination of employment, commercial engagement or appointment.

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Policy control

Current from	1 July 2025
Replaces version dated	3 March 2022 (formerly titled Conflict of Interest Policy)
Review period	Biennial
Sponsor	Chief People Officer
Approved by	Board