

# Conflicts of Interest Policy

**NOTE:**

All amendments to this policy must be authorised by the Policy Owner and notified to the Casino Regulator within 7 days of approval.

Contact Group Compliance at [complianceseg@star.com.au](mailto:complianceseg@star.com.au) for further details

**Policy Details**

**Policy Owner**

Group Chief Risk Officer

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**Approved by**

Scott Saunders

**Document Control**

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# THE STAR

Version	Reason for change	Details of changes	Date
<b>1.0</b>	Policy created	New policy	1 March 2018
<b>2.0</b>	Minor enhancements	Policy uplift	29 June 2021
<b>2.1</b>	Contact information updated	Whistleblower Service contact information updated	22 February 2023
<b>3.0</b>	Updated for PVPs and transferred to new policy template  Included new timings for declaring conflicts	Policy updated to include PVP, 7 day time period for declaring a conflict, transferred to new template and aligned to new policy structure	8 March 2024

## 01 Purpose and Scope

In accordance with the Code of Conduct guiding principles, The Star Entertainment Group (TSEG) is committed to conducting business in a manner which is ethical, professional and compliant with the law.

This Policy articulates the standards expected of everyone who performs work for and on behalf of TSEG. This Policy applies to all TSEG directors, executives, team members and contractors at all TSEG locations.

A breach of this Policy may be regarded as a breach of TSEG’s Code of Conduct which may result in disciplinary action up to and including termination of employment.

### TSEG’s Purpose, Values and Principles

TSEG is committed to driving its purpose of *creating fun at trusted destinations*. To do so, the Purpose, Values and Principles (PVP) have been developed by TSEG which sets out a target culture for the organisation. The PVP is an ethical decision-making framework that sets out target mindsets and behaviours that TSEG and its team members should be considering and using to guide their actions.

Fundamentally, our policies, and adherence to our policies, are a way through which TSEG can ensure it is a trusted destination for its team members, its stakeholders, and the wider community.

TSEG ensures that the management of conflicts of interest is guided by the TSEG’s purpose, values, and principles.

## 02 Policy Requirements

When conflicts of interest arise, the following guiding principles should be followed by team members:

Principle	Description
<b>Declare</b>	All team members must declare conflicts of interests once they are identified.
<b>Register</b>	All conflicts of interest need to be detailed on the conflicts of interest register.
<b>Manage or avoid</b>	Conflicts of interest can be managed by appropriate controls where possible. If a conflict of interest cannot be managed by appropriate controls, they must be avoided.
<b>Monitor</b>	Where conflicts of interest are identified they must be regularly monitored until the conflict no longer exists.

## 2.1 What is a Conflict of Interest?

2.1.1 A conflict of interest occurs when the personal interests of a team member compromise their ability to make decisions or take actions during the course of their employment which are in the best interests of TSEG.

2.1.2 Conflicts of interest can be:

- **Actual** – where an actual conflict of interest exists.
- **Perceived** – where there is a reasonable belief or suspicion that a conflict exists even though it may not actually exist.
- **Potential** – where no actual conflict of interest exists but there is the possibility of one in the future.

2.1.3 Conflicts of interest can arise in, but are not limited to, the following business dealings:

- providing services to guests
- purchasing and awarding supply or service contracts
- selection and recruitment of team members
- team member transfer and promotion decisions
- team member shift rostering decisions
- training and development opportunities with suppliers or business partners
- remuneration review process
- team member performance management
- handling grievances and incident investigations
- decisions relating to disciplinary action against or dismissal of a team member
- auditing and surveillance
- running a business or working in a second job which might compete with aspects of TSEG’s business or which could compromise a team member’s ability to fully discharge their duties as a TSEG team member.

2.1.4 While it is not possible to identify all conflicts of interest, the table below provides details of some of the more common conflicts of interest that may arise at TSEG:

Type	Description
<b>Close Personal Relationship</b>	Intimate or family relationships that exist between team members that work directly with each other at TSEG and could potentially influence judgement or impact decisions in respect of either parties or a third party.
<b>Receiving gifts or hospitality from Suppliers or Business Partners</b>	<p>Team members receive gifts or hospitality from current or potential Suppliers or Business Partners in the ordinary course of their duties. This may include, but not limited to, meals, accommodation, tickets to sporting or entertainment events.</p> <p>In accordance with the Gifts Policy, team members may accept gifts or hospitality from current or potential business partners or suppliers provided the following apply:</p> <ul style="list-style-type: none"> <li>• The gift must not be in the form of cash or cash equivalents, such as gift cards</li> <li>• If the gift is in the form of a discount, the business partner or supplier must only provide discounts available to all TSEG team members</li> </ul>

Type	Description
	<ul style="list-style-type: none"> <li>The gift or hospitality could not be reasonably interpreted as a bribe to secure business</li> <li>The gift or hospitality must not be offered or accepted during tender or contract negotiations.</li> </ul> <p>Gifts or hospitality with a value above \$250 must be approved by a General Manager or above. For further details consult the Gifts Policy.</p>
<b>Receiving gifts from guests</b>	<p>Team members receive a gift from a guest in the ordinary course of their duties. This does not include tips or gratuities.</p> <p>In accordance with the Gifts Policy, team members must never ask for a gift from a guest and must report all gifts received or offered on the gifts register.</p> <p>Licensed team members are not permitted to accept any gifts from guests.</p> <p>Unlicensed team members are permitted to accept gifts from guests but must strictly follow the guidelines set out in the Gifts Policy.</p>
<b>Delegated Authority</b>	<p>Team members with delegated authority to approve certain financial transactions are not permitted to approve payments to themselves or person who they have a close personal relationship with. In these circumstances payments should be approved by an appropriate alternative delegate.</p>

2.1.5 The potential for, or presence of, a conflict of interest does not indicate wrongdoing. However, failure to adequately manage conflicts of interest can damage TSEG's reputation.

2.1.6 Team members are obliged to avoid conflicts of interest and ensure their actions do not conflict or appear to conflict with the Purpose, Values or Principles of TSEG.

## 2.2 Declaring Conflicts of Interest

2.2.1 Team members are required to declare actual, potential or perceived conflicts of interest within 7 days of them being identified. Team members should enter details to the conflicts of interest register located on TSEG's intranet.

2.2.2 Where applicable, team members must declare conflicts of interest prior to commencing employment at TSEG or before participating in any decision-making process to which the conflict relates.

2.2.3 Group Compliance are responsible for reviewing all entries to the conflicts of interest register and will confirm if an actual, potential or perceived conflict exists.

2.2.4 Team members should contact Group Compliance [complianceseg@star.com.au](mailto:complianceseg@star.com.au) for assistance if they are unsure whether a conflict of interest exists in relation to themselves or others.

2.2.5 Team members may report a conflict of interest about another team member(s) using the **Your Call Whistleblowing Hotline**: 1800 319 826 (a free call within Australia) or by contacting Investigations or Employee Relations.

## 2.3 Managing Conflicts of Interest

2.3.1 Confirmed conflicts of interest must be assessed by management to determine whether it can be managed with appropriate controls or if it must be avoided.

2.3.2 Group Compliance must commence the review and assist management with the preparation of a suitable conflict management plan within 30 days of a conflict of interest being recorded in the conflict of interest register.

2.3.3 Details of the conflict management plan are to be entered on the conflicts of interest register. Conflict management plans are to be monitored regularly by management to ensure they are working effectively.

2.3.4 Conflict management plans must be approved by the team member's direct manager (or person responsible for overseeing the management of the conflict).

2.3.5 Conflicts that cannot be managed effectively must be avoided. This may involve the affected team members being removed from decision-making positions.

2.3.6 Details contained on the conflicts of interest register are confidential and should only be accessed by team members who have direct responsibility for monitoring and managing conflicts of interest.

## 03 Roles and Responsibilities

The table below provides details of the responsibilities related to this Policy:

Role	Responsibility
<b>All team members</b>	<ul style="list-style-type: none"> <li>Disclose conflicts of interest within 7 days after identifying them</li> <li>Act in the best of TSEG by following the PVPs</li> <li>Understand what and how conflicts of interest may arise</li> <li>Take reasonable steps to avoid conflicts of interest</li> <li>Seek guidance where required from supervisors or Group Compliance when unsure about conflicts of interest</li> <li>Abide by the conditions of any conflict management plan there are subject to</li> <li>Report gifts received from guests on the gifts register</li> <li>Complete mandatory training when required</li> </ul>
<b>Management</b>	<ul style="list-style-type: none"> <li>Promoting compliance with this Policy</li> <li>Ensure direct reports understand the requirements of this Policy and report Conflicts of Interest when required</li> <li>Comply with advice and guidance in relation to managing conflicts of interest</li> <li>Assisting Group Compliance with the development, implementation and monitoring of management plans</li> <li>Ongoing monitoring of management plans to ensure they are effective</li> </ul>

Role	Responsibility
<b>Group Compliance</b>	<ul style="list-style-type: none"> <li>• Maintain that conflicts of interest register</li> <li>• Review and validate entries to the conflicts of interest register</li> <li>• Provide advice and guidance to the business on conflicts of interest</li> <li>• Assist with the development of conflict management plans</li> <li>• Monitor ongoing conflict management plans</li> </ul>
<b>Safer Gambling, Governance &amp; Ethics Committee</b>	<ul style="list-style-type: none"> <li>• Provide oversight of the conflicts of interest process</li> </ul>

## 04 Breaches of this Policy

TSEG is committed to conducting its operations in a way that meets its commitments to regulators, guests, and the wider community. Non-conformance with a policy, including this policy, can pose a significant risk to TSEG, guests, and the wider community, potentially resulting in punitive measures against TSEG.

Team members who become aware of an actual or possible breach of this policy must follow the established protocols set out in the Incident and Breach Management Policy. The Incident and Breach Management Policy has strict timelines in place to satisfy regulatory requirements; if a team member has reason to believe that a breach may have occurred it is imperative that those protocols are followed expeditiously to avoid adverse consequences.

Non-conformance with this policy may also amount to a breach of TSEG's Code of Conduct and values. Breaches of the Code of Conduct may result in disciplinary action, including termination of employment, fines, penalties, and potential prosecution.

## 05 Definitions

Term	Definition
<b>Conflict of Interest</b>	Any actual, potential or perceived conflict between the best interest of TSEG and a team member's personal interest.
<b>Contractor</b>	<p>means one of the following:</p> <ul style="list-style-type: none"> <li>• Independent contractors: self-employed individuals or are part of a proprietary company (ABN) usually engaged for project work and paid for results achieved.</li> <li>• Contingent workers: individuals engaged to ensure coverage or support for TSEG roles. For example, a contingent worker is in a role that is vacant, whilst the position is being recruited.</li> <li>• Consultants: individuals engaged to deliver set outcomes, provide advice or recommendations, and are usually paid on completion of milestones or deliverables. Procurement is to be engaged when considering using consultants to agree the terms and conditions with TSEG.</li> </ul>



Term	Definition
Licensed Team Member	means any team member who requires a gaming licence from Liquor & Gaming NSW (NSW) and/or Office of Liquor, Gaming and Racing (Qld) to perform their duties.
Team Member	means full-time, part-time and casual employee of TSEG
Unlicensed Team Member	means any team member who does not require a gaming license to perform their duties.
TSEG	The Star Entertainment Group

## 06 Relevant Legislation and Regulations

Document Title
<i>Casino Control Act (NSW) 1992 – Sec. 86</i>
<i>Fair Work (Registered Organisations) Act 2009</i>
ICM R (QLD) – Staffing and Employees
ICM 2 (NSW) – Staffing and Employees

## 07 Related Policies and Documentation

The following policies and documentation related to this policy can be found on TSEG’s intranet site:

- Code of Conduct
- Delegated Authority Policy
- Gifts Policy
- Procurement Policy
- Team Member Gambling Policy
- Whistleblower Protection Policy

## 08 Feedback and Questions

Please contact Group Compliance for any questions relating to this policy.