Classification: Public

Conflicts of Interest Policy

Coverage	*All Iress People, including employees, contractors, suppliers and consultants*
Geographic scope	*Global*

1. Introduction

Managing conflicts of interest is integral to the way we do business, treat our clients and our people, and deliver value to our shareholders. Iress is committed to complying with all applicable legal and regulatory obligations regarding the identification and management of conflicts.

2. What is a conflict of interest?

A conflict of interest occurs when your personal activities, relationships, or financial stakes overlap with your professional responsibilities in a way that could, or appears to, compromise your objectivity. This may include:

- **General Conflict:** When private interests interfere, or appear to interfere, with your duties to Iress.
- **Financial Interest:** Ownership, compensation, or investment in entities that Iress does business with or competes against.
- **Family or Friends**: Any close personal relationship, including familial relationships or close friendships, that could or appears to compromise your objectivity or interfere with your duties to Iress.

The Three Types of Conflict

- **Actual**: A real conflict that currently exists.
- **Potential**: Interests that may, given the circumstances, come into conflict with your duties in the future.
- **Perceived**: Where it could be reasonably perceived by others that a conflict exists, potentially influencing your duties in the present or future.

3. Reporting conflicts

Conflicts of interest occasionally occur. These conflicts are manageable if they are openly and promptly disclosed and effectively handled. What you do, or don't do, once you become aware of a conflict is what matters. **You must report all actual, potential or perceived conflicts of interest.**

Iress maintains a culture where honesty is valued;you will not suffer professional detriment or penalty solely for the act of disclosing a conflict.

The active concealment of a conflict is considered a significant breach of trust.

Your Responsibilities:

- **Be Aware**: Understand your obligation to report conflicts.

- **Assess**: Regularly evaluate whether your private interests (or those of your family) overlap with your job.
- **Disclose**: Formally disclose any conflict (actual, perceived or apparent) as soon as it arises.
- **Update**: Renew your disclosure annually or whenever your circumstances change.

4. How to Report a Conflict of Interest

Log any conflicts of interest in Alfred as soon as possible. Conflicts of interest can be logged by navigating to the Alfred homepage, then Compliance then select Conflicts of Interest. You then fill in a form which is sent to your people leader and Legal and Compliance for assessment.

5. Managing conflicts

When a conflict is identified, Employees must promptly report it so that it can be assessed and appropriate steps can be taken to manage or avoid the conflict. Iress maintains organisational, procedural, and administrative controls to manage these situations, including:

- **Review**: Legal and Compliance and/or the relevant Executive will review the disclosure to determine the nature and severity of the conflict.
- **Recusal**: The individual with the conflict must refrain from any action, discussion, lobbying, or voting related to the relevant matter.
- **Mitigation**: If the interest is deemed manageable, Iress may allow the activity to proceed under specific controls. This typically requires the conflicted individual to be removed from all related influence or decision-making to ensure the process remains impartial. If the conflict cannot be effectively managed or mitigated, the individual may be required to cease the outside activity or relinquish the personal interest to continue in their role at Iress.

6. Record Keeping, Privacy and confidentiality

Iress will treat your disclosures with the highest degree of confidence. Records of disclosures and management plans will be maintained by Legal and Compliance in a Conflicts of Interest register.

Information will only be shared with relevant stakeholders on a "need-to-know" basis to ensure the conflict is effectively managed.

7. Violations and Non-Compliance

Adherence to this policy is a condition of engagement for all Iress People. Failure to disclose a known conflict of interest is a serious breach of professional conduct and the terms of employment at Iress. Conflicts have the potential to lead to bribery or corruption (refer to the Anti Bribery & Corruption Policy).

Failure to comply may result in disciplinary action, up to and including termination of employment or contract, in accordance with local laws. In addition, Iress reserves the right to refer serious or specific breaches (such as fraud or bribery) to relevant law enforcement agencies.

If you suspect this policy is being breached, it is paramount to raise those concerns directly with Procurement or Legal and Compliance. Suspected breaches of this policy can also be disclosed under the Iress Whistleblowing Policy.