



Conflicts of Interest Policy

This Conflicts of Interest Policy applies to all Employees of the business.

The objective of the policy is to establish procedures for identifying and managing actual or potential conflicts of interest that may arise.

The requirement is for all staff to comply with Conflicts of Interest Policy.

Procedures (not required)



Purpose

The purpose of this policy is to establish guidelines and procedures for identifying, disclosing, managing and mitigating actual or potential conflicts of interest that may arise in the course of our business operations. This policy is intended to ensure that our business operates with integrity, impartiality, and transparency, and that our decisions are made in the best interests of our clients and stakeholders.

Objective

The objectives of this policy are:

- To identify and disclose actual or potential conflicts of interest that may arise in the course of our business operations.
- To ensure that all employees, contractors, and agents are aware of their responsibilities to avoid or manage conflicts of interest.
- To manage and mitigate conflicts of interest in a fair and transparent manner, ensuring that all decisions are made in the best interests of our clients and stakeholders.
- To maintain the trust and confidence of our clients, stakeholders, and the wider community by operating with integrity and transparency

Policy Requirements

The standard required from all staff is to adhere to the following:

- **Disclosure of Conflicts of Interest:**

All employees, contractors, and agents must disclose any actual or potential conflicts of interest that may arise in the course of their work for our business. This includes any financial or personal interests that may conflict with the interests of our clients or stakeholders, or that may affect their ability to make unbiased decisions.

Disclosure must be made as soon as the conflict of interest is identified and must be made in writing to the relevant manager or supervisor.
- **Management of Conflicts of Interest:**
 - Where a conflict of interest has been identified, the relevant manager or supervisor must assess the situation and determine the appropriate course of action to manage or mitigate the conflict of interest. This may include measures such as:
 - Disclosing the conflict of interest to relevant parties, such as clients or stakeholders.
 - Restructuring roles or responsibilities to avoid the conflict of interest.
 - Seeking advice from a third party, such as a legal or financial advisor.
 - Refraining from making decisions that may be affected by the conflict of interest.
- **Monitoring and Review:**

This policy will be regularly reviewed to ensure that it remains relevant and effective in managing conflicts of interest. All employees, contractors, and agents will be required to



undertake regular training to ensure that they are aware of their responsibilities in relation to conflicts of interest. Any breaches of this policy may result in disciplinary action, up to and including termination of employment or contract.

Conclusion:

This policy is an essential component of our commitment to operating with integrity, impartiality, and transparency. By ensuring that we identify, disclose, manage and mitigate conflicts of interest in a fair and transparent manner, we can maintain the trust and confidence of our clients and stakeholders, and uphold our reputation as a responsible and ethical business.

The Director is responsible for communicating the Conflicts of Interest Policy to all persons working for or on behalf of the organisation and making it available to interested parties.