

CONFLICT OF INTEREST POLICY

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Prepared by

Corporate Governance on 12 April, 2019

Authorisation

This Policy was authorised by Corporate Governance on 12 April, 2019.

Policy owner

Corporate Governance

HostPolicy@hostinternational.org.au

Version history

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1	12 April, 2019	New policy	Angela Sharpe	12 April, 2019

1. Policy Statement

- 1.1 This Conflict of Interest Policy (Policy) outlines the position and expectation of HOST International (HOST) with regards to conflicts of interest.
- 1.2 HOST is committed to ensuring that actions and decisions taken at all levels in the organisation are informed, objective and fair. A conflict of interest may affect the way a person acts, decisions they make or the way they vote on group decisions.
- 1.3 Conflicts of interest must be identified, and action taken to ensure that personal or individual interests do not impact on the organisation's services, activities or decisions.
- 1.4 Declaration and management of conflicts of interest are specifically required for Board members as part of their legal responsibilities as Board members.

2. Application of this Policy

- 2.1 This Policy applies to all staff including senior managers, officers, directors, consultants, contractors, trainees, volunteers, students, full time, part time, fixed-term, maximum-term, casual, permanent and temporary employees and agency workers.
- 2.2 All Board members, staff, volunteers and contractors are required to act in the interests of the organisation always, and to notify the organisation when this conflicts with other interests or commitments.
- 2.3 Supervisors and managers also have a specific responsibility for ensuring that all staff understand this Policy.

Non-contractual status of this policy

- 2.4 This Policy is not in any way incorporated as part of any award or enterprise agreement entered into by HOST, nor does it form any part of an employee's contract of employment. HOST may amend this Policy at any time in its sole discretion.

3. What is a conflict of interest?

A conflict of interest occurs where you have a personal and professional interest at the same time. In these situations, you are often unable to make a decision that is truly in the best interests of HOST and its constituents.

A conflict of interest within the company can cause staff, stakeholders and the people we work for to doubt our integrity. If a situation creates, or could lead to a conflict of interest, then it should be avoided. Where a conflict of interest cannot be avoided, the conflict must be disclosed to appropriate staff to be managed appropriately.

- 3.1 Conflicts can be either actual, potential or perceived
- (a) Potential - where a person has a personal interest that could conflict with their official duties in the future
 - (b) Perceived - when a reasonable person, knowing the facts, would consider that a conflict of interest may exist, whether or not this is the case
 - (c) Actual —~~an~~ an actual conflict of interest occurs when there is a conflict between a person's official duties and responsibilities in serving the public interest, and their personal interest.
- 3.2 Examples of a conflict of interest include situations in which:
- (a) Using your role at HOST to acquire goods and services for local community members, stakeholders or clients.
 - (b) Starting a business or having authority or input in a business that has activities that are the same or similar to HOST.
 - (c) Using your role to secure financial gain through business opportunities that are similar to HOST.
 - (d) Employing your friends or relatives, including friends or family members are involved, such as decisions about employment, discipline or dismissal, service allocation or awarding of contracts
 - (e) Accepting gifts, entertainment, and other business courtesies for personal gain.
 - (f) Romantic relationships between co-workers, clients or stakeholders.
- 3.3 In order to maintain our integrity, this Policy requires that all persons to which this Policy applies to will:
- (a) act impartially and without prejudice
 - (b) declare any potential or actual conflict of interest
 - (c) declare all personal, professional or financial interests that may, or may be seen to, influence the performance of our duties;

- (d) declare any conflict of interest that arises within our role while conducting business on behalf of HOST;
- (e) not exploit client/co-worker relationships or knowledge for professional gain or profit;
- (f) be mindful of potential or perceived power imbalance for expat workers deployed overseas and employed locally;
- (g) not use our position with HOST to gain personally, or to be perceived as benefitting personally; and
- (h) keep friends and relatives out of our reporting lines
- (i) do not accept gifts or benefits that would influence a decision, for further details refer to the Gift Policy.
- (j) When engaging in procurement duties the HOST Procurement Procedure must be adhered too in order to manage any conflict of interest

4. Registration of known conflicts of Interest

- 4.1 A conflicts of interest register will be kept for all board or management committee members and a separate one for staff and Volunteers. Board members, staff and volunteers will be asked to declare all actual, perceived and potential conflicts of interests as stated below:
- (a) **Actual:** an actual conflict of interest occurs when there is a conflict between a person's official duties and responsibilities in serving the public interest, and their personal interest.
 - (b) **Perceived:** a perceived conflict of interest occurs when a reasonable person, knowing the facts, would consider that a conflict of interest may exist, whether or not this is the case.
 - (c) **Potential:** where a person has a personal interest that could conflict with their official duties in the future.
- 4.2 The register from a board level will be maintained by the Company Secretary, the register for staff will be maintained by the Corporate Governance team, who will inform the Secretary. All actual, perceived and potential conflicts will be recorded in the registers, showing:
- (a) the name of individual
 - (b) their position or role in the organisation
 - (c) the nature of the interest they hold
 - (d) the date of record
 - (e) any incidents that arise where the interest comes into conflict with the interests of the organisation, the date of the incident and a summary of how it was managed.

5. Management of conflicts of interest

Where a conflict of interest is declared, or identified:

Board members:

The Chairperson and/or the Board Committee will assess whether a conflict exists. If the matter is not resolved prior to a meeting, the Board Committee will decide on the action to be taken by the individual. They may be asked to:

- (a) contribute to the discussion but abstain from voting or taking part in a decision on the matter
- (b) observe but not take part in the discussion or decision making
- (c) leave the meeting during discussion and decision on the matter

Where the board member has a significant ongoing conflict of interest they may be asked to:

- (d) take leave of absence from the Board for the period over which the matter will be discussed and decided
- (e) resign from the Board
- (f) the declaration of conflict of interest will be recorded in the minutes of the Board meeting along with the action taken.

Staff members:

The conflict will be assessed by the staff member's immediate supervisor, remedial action will be taken considering the nature of the conflict and the options available to mitigate the conflict of interest.

6. Review

This Policy will be reviewed annually OR at any other time as required.