

CONFLICT OF INTEREST POLICY

1. OBJECTIVE

To enable ACARA employees, executives, affiliates and other individuals who work with and/or represent ACARA to effectively identify, disclose and manage any actual, potential or perceived conflicts of interest.

This policy should be read in conjunction with the ACARA Code of Conduct. It should also be read in conjunction with the procedure for managing conflicts of interest, and any other applicable ACARA policies, procedures and guidelines.

2. POLICY CATEGORY

Core All ACARA employees, affiliates and contractors are expected to be aware of, understand and know where to locate this policy.

3. SCOPE

This policy applies to all ACARA employees, executives, affiliates, contractors and other individuals who work with and/or represent ACARA.

4. STATEMENT

Employees, executives and affiliates are required to take reasonable steps to avoid any conflict of interest.

This policy is intended to:

- avoid an actual, perceived or potential conflict of interest which may breach the ACARA Code of Conduct and place ACARA at significant risk of reputational damage and potential financial loss;
- ensure that employees' personal business, financial and other outside interests, dealings and relationships do not conflict with or appear to conflict with, work at ACARA.

In some circumstances, failure to disclose a relevant interest may constitute corrupt conduct and may constitute an offence against the *Public Governance, Performance and Accountability Act 2013*.

All conflict of interest declarations must be made in writing (including via email) to ACARA.

Conflicts of interest will be recorded and monitored by the Board Secretariat using ACARA's Conflict of Interest Register.

5. RESPONSIBILITIES

5.1. Specific responsibilities / position title

The Responsible Officer is responsible for:

- maintaining records of disclosed interests
- maintaining the register of interests declared under statutory or other regulation (where one is required);
- ensuring this policy is kept current;
- providing a point of contact for anyone wanting information or advice about its meaning or application;
- providing a point of contact for anyone wanting assistance in identifying a conflict of interest and/or the type of conflict;
- receiving complaints and information about possible breaches of the conflict of interest policy, investigating these and enforcing policy compliance; and
- ensuring that the conflict of interest communication strategy is implemented.

5.2. ACARA Executive Leadership Team (ELT)

Members of ACARA's Executive Leadership Team Senior are responsible for the review and approval of this policy.

Executives and managers are responsible for ensuring compliance within their areas or responsibility and leading and modelling behaviour by actively documenting and managing conflicts.

5.3. ACARA's Chief Executive Officer

The CEO is accountable for implementing this policy and ensuring compliance with it.

6. RELATED LEGISLATION, POLICIES AND AGREEMENTS

6.1. Legislation

[Public Governance, Performance and Accountability Act 2013.](#)

6.2. Policies

ACARA Code of Conduct

ACARA Delegation of Authority Policy

ACARA Risk Management Policy

7. RELATED PROCEDURES AND GUIDELINES

7.1. Procedures (mandatory)

Conflict of Interest Procedure

Conflict of Interest Register

Gifts and Benefits Register


Conflict of Interest Disclosure Form

8. IMPLEMENTATION

Staff will be made aware of their responsibilities under this policy via:

- corporate induction
- the announcements section of ACARA's corporate intranet
- ACARA staff e-news

9. POLICY ADMINISTRATION

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| Policy owner | Board Secretary |
| Review frequency | Every three years |
| Approved by |  _____ David de Carvalho Chief Executive Officer |
| Date | 11 July 2019 |

10. VERSION HISTORY

| Version | Date | Amendment | Author |
|---------|---------------|-------------------------|------------------------------------|
| 1.0 | November 2014 | First published version | Peter Matheson Board Secretary |
| 2.0 | March 2017 | Updated | Peter Matheson Board Secretary |
| 3.0 | June 2019 | Updated | Christine Roach Board Secretary |