

## Conflict of Interest Policy

Grameen Foundation Australia is committed to high standards of ethical conduct and accordingly places great importance on making clear any financial or non-financial existing, potential or perceived conflict of interest. Our aim is to protect the integrity of the decision-making processes within Grameen Foundation Australia by avoiding ethical, legal, financial or other conflicts of interest.

Grameen Foundation Australia's Conflict of Interest Policy adheres to the *Australian Research Council (ARC) Guidelines for Disclosure of Interests and Confidentiality Obligations* and to the *Australian Public Commission's (APS) Code of Conduct*.

### **Conflict of Interest Definitions**

- A *conflict of interest* occurs when the interests or personal circumstances of a Board Member, Staff Member or Volunteer of the Organisation could influence, or could be perceived as influencing, the performance of their duties.
- Conflicts of interest may occur in the following situations, as referred to in the Organisation's *Employment Policy*:
  - Related party transactions that could benefit or could be perceived as benefiting a Board Member, Staff Member or Volunteer
  - Awarding of contracts or procurement of goods and services where favour is shown to a supplier
  - Personal and family relationships of Board Member, Staff Member or Volunteer where a perception of unfair advantage could arise
  - Use of facilities and equipment for personal or third party interests
  - Use of official information where internal information is knowingly or unwittingly shared with a third party
  - Providing favour to allied religious, ethnic or family groups
  - Secondary employment or contracting where such engagement is at odds with fulfilment of the Board Member, Staff Member or Volunteer's responsibilities

### **Conflict of Interest Policy Outline**

- The Organisation places great importance on making clear any existing or potential conflicts of interest
- Board member conflicts of interest shall be declared by the Board Member concerned, documented in the Conflicts of Interest Register and noted in Board meeting minutes.
- A Board Member who believes another Board Member has an undeclared conflict of interest should specify in writing to the Chair the basis of this potential conflict. If the action relates to the Chair the report should be made to the Head of the Audit and Risk Committee.
- Where a Board Member has a conflict of interest, that Board Member shall not initiate or take part in any discussion on that topic (either in the meeting or with other Board Member before or after the meetings), unless expressly invited to do so by unanimous agreement by all other Board Member present.
- Where a Board Member has a conflict of interest that Board Member shall not vote on that matter.
- Board Members are not barred from engaging in business dealings with the

Organisation, provided that these are negotiated at arm's length without the participation of the Board Member concerned.

- Board Members are permitted to be involved with other Organisations provided these are not in direct competition with the Organisation.
- Board Members are expected to advise the Chair where they have, or are considering, an involvement with another Organisation. If the action relates to the Chair the report should be made to the Chief Executive Officer.
- Staff Members and Volunteers who may have a Conflict of Interest must declare this potential interest. The Executive shall review the potential interest and determine how the conflict shall be managed. Management may include clarification from the staff member or volunteer and/or relevant external parties to determine the nature of the conflict and any actions to be taken to ensure compliance under the Policy. A potential conflict may be submitted to the Board for final review.
- In certain circumstances, in the case of a Board Member resignation from a position may be necessary. In the case of a Staff Member, termination of the conflict may be necessary. In the case of a Volunteer, termination of the conflict or termination of the role of the volunteer with the Organisation may be necessary.
- If a Board Member, Staff Member or Volunteer declares themselves to have an existing or potential conflict of interest, confidentiality will be respected.
- Gifts, entertainment and non-financial incentives should not be given or received if they create a feeling of obligation.
- Giving or accepting reasonable entertainment such as meals or events by a Board Member, Staff Member or Volunteer is acceptable if it advances the work of the Organisation and is without conflict of interest.
- Board Members, Staff Members or Volunteers are not to give gifts, payments, discounts or services unless they are of nominal value and appropriate to the circumstances.
- Any gift or entertainment given or received by a Board Member, Staff Member or Volunteer in excess of AUD\$250 must be reported and registered
- A Board Member, Staff Member or Volunteer who breaches the Conflict of Interest Policy faces disciplinary action, which may lead to dismissal, and/or legal action and/or information being passed to relevant authorities.

#### ***Responsibilities of Board Members, Staff Members and Volunteers***

- Being aware of their obligations to avoid, where possible, conflicts of interest or duty;
- Assessing if their personal and business interests conflict or have the potential to conflict with their duty as a Board Member whichever the case may be;
- Formally disclosing to the Board or Senior Executive as relevant all actual, potential or perceived conflicts of interest or duty as soon as they may arise;
- Complying with any other requirements of this policy.

#### ***Review and Evaluation***

The Board is responsible for oversight of this policy. All Board Members, Staff Members and Volunteers are responsible for adhering to this policy.

Senior Management will undertake an annual review of this policy in line with



Grameen Foundation Australia's organisational capacity, the policy purpose stated, and within the framework of the Organisation's commitment to quality assurance and continuous improvement. The updated policy will require formal Board approval and will be communicated to all staff for review and re-signing if applicable.