

# Conflict of Interest

## Overview

This policy defines a conflict of interest and outlines how we will manage conflicts of interest

## Scope

This policy applies to St George Community Housing Limited and its subsidiaries (we, our and us).

This policy applies to our employees, contractors, directors and volunteers (you, your, our people).

## Aim

The aim of this policy is to:

- Maintain and be seen to maintain a high standard of ethics and avoid any situation that might reflect unfavourably on us.
- Make sure we meet our legal duties
- Make sure that our people don't receive personal benefits (other than a salary, employee or other contractual entitlement) because of their position with us.

## Definition

### Conflict of Interest

A conflict of interest is where someone's personal interests conflict with their responsibility to act in our best interests. A personal interest isn't just your own interests and could include the interests of family, friends or other organisations or companies that you are involved with.

Conflicts of interest include actual or perceived conflicts, or potential conflicts that could exist in the future.

A conflict of interest, or perceived conflict of interest, can also arise where a person has a duty arising from one position or role they hold, and another position or role whether within or outside the SGCH group of companies. Examples include potential conflicts of interest arising from the duty to act in the best interest of SGCH or its subsidiary entities, or potential conflicts of duty of directors or employees due to roles they hold in entities outside the SGCH Group.

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### **Actual conflict of interest**

An actual conflict of interest exists where there is a direct conflict between a person's current duties with us and any personal interests.

### **Perceived conflict of interest**

A perceived conflict of interest is where it appears or could be perceived that personal interests are influencing performance or decision making.

### **Potential conflict of interest**

A potential conflict of interest is where someone's personal interests are not currently in conflict with their role with us but could come into direct conflict.

## **Required disclosures**

Our people have a responsibility to be aware of their interests and declare in advance any actual, perceived or potential conflicts of interest as soon as possible. If any of our people are unsure whether a conflict exists or think that there is a chance that there is a conflict, they should disclose the conflict as soon as they identify that there may be an issue.

A Conflict of Interest Declaration form must be completed by our people when they start working with us, and then on an annual basis or as and when they become aware of a conflict.

At the beginning of each board, executive and board committee meeting, the Chair will discuss conflicts of interest and obtain a verbal declaration from each person as to whether they have any conflict to declare. Any conflicts of interest declared will be recorded in the minutes of the meeting. If any conflicts of interest are declared, the Chair (or in the case of the Chair the Deputy Chair) and Directors in consultation with the Company Secretary will decide how to manage the conflict, which may include stopping the person from being involved in decisions or discussions about the matter, or leaving the room when certain matters are being discussed. Directors are required to provide a disclosure of interest on appointment and then on an annual basis as their circumstances change or new interests arise.

## **Information to be declared**

Our people must disclose any actual, perceived or potential conflicts. Interests could include:

- Personal arrangements such as:
  - shareholdings
  - real estate
  - partnerships

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- organisational memberships
  - directorships or employment
  - assets
  - other sources of income
  - liabilities
  - savings and investments
  - bond, debentures and similar investments
  - family or private businesses, trusts or nominee companies
  - affiliations with for-profit, non-profit, political, union or professional organisations
  - obligations resulting from community, religious, ethnic, professional or other groups
  - future employment prospects or plans
  - hatred or competition with other individuals or groups
  - highly specialist skills where demand exceeds supply
  - Significant family or other relationships or associations (including with customers, contractors or other employees that we have dealings, or are in competition with).
  - Contracts or agreements that we might enter into
  - Arrangements for the supply of goods or services to us
  - Arrangements that have the potential to breach our policies

## Managing conflicts of interest

All declared conflicts of employees, contractors and volunteers will be passed to the Chief Executive Officer (CEO), or the Chair in the case of the CEO, who will approve an appropriate way to manage the conflict. This could include:

- restricting the persons involvement in the matter
- removing the person from any involvement in the matter
- recruiting a third party to participate in, oversee or review the matter
- asking the person to relinquish their personal interests
- asking the person to resign from their position (either with us or the other companies/organisation).

Any person who declares a conflict of interest must immediately remove themselves from any involvement in the matter and must not have any involvement in the matter unless authorised by the CEO/Chair.

Directors must disclose any actual, perceived or potential conflicts to the Chair (or Deputy Chair for the Chair) who, with the Board and Company Secretary, will determine how the

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conflict will be managed. Directors are responsible for making sure that they meet their legal duties relating to conflicts of interest.

## Changes in interests

Where circumstances that relate to an actual or perceived conflict of interest change in a way that could change the understanding or management of an issue, our people must make an updated declaration

## Relevant legislation, regulation and standards

- [Corporations Act 2001 \(Cth\)](#)

## Related documents/resources

- [Policy – Code of Conduct and Ethics](#)

## Policy information

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