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## 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.

### Definitions

#### 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 a person that you have a close personal/family relationship with, or other organisations or companies that you are involved with. An interest may be monetary or non-monetary.

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.

#### Actual conflict of interest

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

Examples of actual conflicts of interest include:

- A team member taking part in a selection, evaluation, or grievance process for someone with whom they have a close personal/family relationship.
- A team member procuring (purchasing) goods or services on behalf of our companies from a supplier with whom they have a close personal/family relationship.
- A team member participating in a tender evaluation involving a tender applicant with whom they have a close personal/family relationship.
- A team member accepting gifts/benefits from a supplier without disclosing it in accordance with the Anti-Bribery, Corruption, Gifts and Benefits Policy.
- A team member managing another team member with whom they have a close personal/family relationship.



- A director, or a person the director has a close/personal relationship with, has a financial interest in an entity we have a contract with, or with whom we are considering entering a contract to arrangement.

### 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.

Examples of perceived conflicts of interest include:

- A team member has a close personal/family relationship with a person who works for a contractor of SGCH.
- A team member has a close personal/family relationship with a customer (e.g. a tenant or someone we provide services to).
- A team member working with a person with whom they have a have a close personal/family relationship.

### 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.

Examples of potential conflicts of interest include:

- A team member accepts a position as a director of another company or charity who provides similar services to us.
- A team member has a close personal/family relationship with a person who works for a government department which we have contracts with. For example, LAHC, Department of Communities and Justice, local councils, or other NSW Government departments such as Treasury or Planning.

### Close personal/family relationship

In this policy, a close personal/family relationship includes:

- A person a team member is closely related to (e.g. parents, grandparents, siblings, dependents, grandchildren).
- A person a team member lives with (e.g. spouse, partner, de facto or other domestic living groups).
- A person a team member is friends with, or someone that they are having, or have had, an intimate relationship with.

## Managing conflicts of interest

### 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 a conflict is either identified or no longer 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 related matter or leaving the room when certain matters are being discussed.

### Managing disclosures

All declarations of Directors, Officers, the Executive Team and the Head of Internal Audit and Risk (or equivalent role) will be passed to the Company Secretary, or the CEO in the case of a declaration from the Company Secretary, who will recommend an appropriate way to manage the conflict. Recommendations will be approved by:

- The CEO for declarations from the Executive Team and the Head of Audit and Risk (or equivalent role).
- The Chair of the Board for declarations by the CEO, Company Secretary and Directors.
- The Deputy Chair for declarations by the Chair of the Board.

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

All declarations of employees, contractors and volunteers will be passed to the Head of People and Development. The Head of People and Development will discuss the conflict with the relevant manager and recommend an appropriate way to manage the conflict. This recommendation will be approved by the Chief Executive Officer (CEO).

Management of conflicts could include:

- restricting the persons involvement in the related matters
- removing the person from any involvement in the related matters
- recruiting a third party to participate in, oversee or review the related matters
- 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 related matter and must not have any involvement in the related matter unless authorised by the CEO/Chair.

### Changes in interests

Where circumstances that relate to a conflict of interest change in a way that could change the understanding or management of an issue, our people must provide a new declaration in relation to that change or new interest.

### Compliance with this Policy

If there is a reason to believe that any of our people have failed to comply with this Policy, we will investigate the circumstances.

Any breaches of this Policy which constitute misconduct or serious misconduct will be managed in accordance with our Disciplinary Action Policy.



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## Relevant legislation, regulation and standards

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

## Related documents/resources

- [Procedure – Conflict of Interest](#)
- [Form – Conflict of Interest Declaration](#)
- [Form – Interest Declaration Form – Directors and Officers](#)
- [Form – Code of Conduct and Ethics](#)
- [Form – Directors Code of Conduct and Ethics](#)
- [Policy – Anti-Bribery, Corruption, Gifts and Benefits](#)
- [Policy – Code of Conduct and Ethics](#)
- Policy – Directors Code of Conduct
- Policy - Disciplinary Action

## Policy information

<b>Version:</b>	11
<b>Approved:</b>	August 2023
<b>Reviewed:</b>	August 2023
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<b>Approval required</b>	Board