

Conflict of Interest, Corporate Behaviour and Reputation

Purpose

Bridge Housing Limited (the company) is committed to effectively managing conflicts of interest and monitoring the corporate behaviour and reputation of its employees.

Scope

This policy applies to Bridge Housing Limited and all its related entities. This policy is for all employees including volunteers and board members, contractors and consultants engaged or employed by Bridge Housing Limited from time to time (from herein referred to as employees).

Definitions

Bridge Housing in this policy refers to Bridge Housing Limited.

Policy Overview

All employees are responsible for ensuring that their personal interests do not come into conflict with their role at Bridge Housing. Conflicts of interest will always arise in organisations: they are an inevitable part of any business. Our aim is not to eliminate conflicts of interest but to develop a culture of recognition, transparency, and effective management. Declarations about corporate behaviour and reputation, including associations with those who may be perceived to have influence over the company must also be dealt with transparently.

This policy provides is designed to assist employees in:

- Identifying a conflict of interest;
- Disclosing and recording conflicts of interest and making appropriate disclosures about corporate reputation and behaviour; and
- Managing conflicts of interest or other disclosures when they arise.

Identifying a conflict of interest

| Type of | Definition | Example |
|---------|------------|---------|
|---------|------------|---------|

| Conflict | | |
|-----------|--|--|
| Actual | Arises when there is a direct conflict between a staff member's duties and responsibilities and their personal interests which influence the performance of those duties | A staff member's family member has been prioritised to receive housing services above another applicant and the prioritisation decision was made by the that staff member. |
| Perceived | Includes situations where it could be perceived, or appear to a reasonable person, that a staff member's personal interests could improperly or unduly influence the performance of their duties and responsibilities. | A staff member is reviewing quotes for a service and one of the potential contractors is the employer of your sibling. While the staff member believes they can make an impartial decision in the best interests of Bridge Housing, it could be perceived as being a conflict of interest. |
| Potential | Where a conflict of interest may arise in the future due to personal interests conflicting with or influencing required University duties or responsibilities. | A staff member is on the selection panel for a job where a relative has applied. |

A conflict of interest exists when a personal interest (financial or otherwise) interferes, or could be perceived to interfere, or potentially interferes with your ability to carry out your work impartially.

All employees will avoid any actual, perceived, or potential conflict of interest with the primary responsibility being the disclosure of the conflict in advance.

Conflicts of interest are particularly likely to arise where a staff member has a family or personal relationship with another party. As such, employees are required to disclose these relationships immediately where it may affect or be seen to affect Bridge Housing's efficiency or reputation.

The following are circumstances where conflicts may arise:

- Employing or terminating employees
- Making development or promotion decisions
- When selecting consultants, contractors, or suppliers
- When allocating properties and making other decisions regarding tenants including relocations, transfers, and evictions
- Purchasing, leasing, or selling properties

Personal relationships

Conflicts of interest are particularly likely to arise where staff members have a close family

or personal relationship with each other or with clients (e.g. supervising a family member, friendships or personal relationships with clients/applicants or the nomination of family members to fill an employment position within the organisation.)

Where an employee has a relationship which may affect, or be seen to affect, Bridge Housing's efficiency or reputation, the situation needs to be managed. As such, the employee concerned needs to disclose the relationship to their manager.

Making a corporate behaviour or reputation disclosure

Employees are also required to disclose any information about:

- their fitness to act including adverse findings and charges;
- their character or conduct;

whether their ability to act is constrained by any other legislation, for example if they are sanctioned as or affiliated with a 'prohibited entity' or 'politically exposed person'.

Managing Conflicts of Interest and Disclosures When They Arise

The primary obligation is to disclose the potential conflict of interest in advance. Failing to disclose a potential conflict of interest appropriately could be regarded as misconduct.

If a staff member believes or suspects that a conflict of interest exists or potentially exists, the following steps must be taken:

- A staff member must immediately disclose any conflict of interest to his or her manager, Executive Director, People, Culture & Brand or General Counsel & Company Secretary using the Disclosure of Conflict-of-Interest Form
- If a staff member is in doubt as to whether a conflict exists, he or she should seek advice from their respective manager, Executive Director, People, Culture & Brand or General Counsel & Company Secretary
- If the manager, Executive Director, People, Culture & Brand or General Counsel & Company Secretary believes a conflict of interest exists then they must direct the staff member to complete a Disclosure of Conflict-of-Interest Form
- If the manager, Executive Director, People, Culture & Brand or General Counsel & Company Secretary is in doubt as to whether a conflict of interest exists, he or she should seek advice from the Chief Financial Officer or the Chief Executive Officer. They will then determine whether the staff member is required to submit a

Disclosure of Conflict-of-Interest Form

- If the Executive Director, People, Culture & Brand, General Counsel & Company Secretary or Chief Executive Officer has a conflict of interest he or she must seek advice from the Chief Executive Officer and/or the Chairperson

The Conflict-of-Interest Form (to be registered with the Executive Director, People, Culture & Brand or General Counsel & Company Secretary) will confirm an ongoing strategy for managing the conflict. This could include:

- No action, as the risk of an actual conflict is remote, and any effect would be minor
- Removing the official from certain duties related to the conflicting interest and/or involving other officers in certain parts of the duties
- Restricting access to certain information relinquishing the conflicting interest (e.g. withdrawing from an interview process that involves a family member or, if supervising a family member, having a more senior official manager to manage that employee)

Purchasing Bridge Housing property and leasing or selling to Bridge Housing

Purchasing, leasing and selling activities must be beyond reproach and completely transparent. A potential conflict of interest may arise when Bridge Housing staff or related parties seek to purchase Bridge Housing properties or land, to sell properties or land to Bridge Housing. Any Bridge Housing staff member or contractor or related party is prohibited from engaging in any of these restricted transactions.

A related party is someone with whom a Bridge Housing employee has a:

- *Family relationship (specifically spouse, siblings, parents, grandparents, children, and grandchildren)*
- *Business relationship other than a casual business relationship*
- *Fiduciary relationship (that is, a person who is entrusted to hold, control, or manage property for another)*
- *Relationship in which one person is accustomed, or obliged, to act in accordance with the directions, instructions or wishes of the other.*

Where a Bridge Housing employee becomes aware that a related party will be or has engaged in a restricted transaction, it is their responsibility to declare the situation to their manager, Executive Director, People, Culture & Brand or General Counsel & Company Secretary. The transaction itself is absolutely prohibited.

Engaging in or not informing Bridge Housing of a restricted transaction will be treated as breach of Bridge Housing Fraud Control Policy, a breach of discipline and constitutes a criminal offence.

Management Responsibility for Conflicts of Interest

Managers need to:

- Be aware of the risks of conflicts of interest amongst Bridge Housing employees they manage.
- Ensure they are flexible and supportive of employees in complex situations.
- Provide advice to employees on how to manage conflicts when they emerge.
- Record conflicts of interest on Bridge Housing's Conflict of Interests Register (through the Conflicts of Interest Form) via Executive Director, People, Culture & Brand or General Counsel & Company Secretary

Bridge Housing will provide training to all staff and senior managers on conflict of interest to assist to identify and manage any perceived or real conflict of interest.

Related Policies and Reference to Regulatory Standards

- Code of Conduct
- Statement of Business Ethics

Regulatory Standards

- 5.1 Fraud and Corruption
- 5.2 Code of Conduct

- Fraud and Corruption Policy
- Whistle-blower Policy
- Gift Policy
- Internal Audit Policy
- Notifiable Incident to Registrar
- Contractor Code of Conduct
- Procurement Policy

Disclosure of a Conflict-of-Interest Form

This form is to be completed by any staff member who has a real or perceived conflict of interest or a potential conflict of interest in undertaking their obligations as an employee of Bridge Housing Limited. A copy of the completed and signed form is to be stored on the staff member's personnel file. The staff members conflict of interest management plan should be reviewed annually at the time of performance appraisal.

Staff member disclosure:

Please complete your answers in block letters

I, (insert full name):

of (insert unit):

Please provide a brief outline of the nature of the conflict (details may be included privately in a separate confidential envelope if appropriate):

This should include:

- (a) Interest in contracts or proposed contracts with Bridge Housing
- (b) Membership with other corporation/firms including the nature and context of your interest (is the entity a NDIS provider)
- (c) Offices or properties held with duties or interest that conflict with your duties in your role at Bridge Housing
- (d) Details of the nature and extent of interests in matters related to Bridge Housing's affairs not disclosed above

Please detail the arrangements proposed to resolve/manage the conflict (attach separately if appropriate):

I, *(insert full name)*:

hereby agree to:

- Update this disclosure throughout the period of my employment with Bridge Housing Limited on an annual basis or until such time as the conflict ceases to exist.
- Co-operate in the formulation of a “conflict of interest management plan” as required.
- Comply with any conditions or restrictions imposed by Bridge Housing Limited to manage, mitigate or eliminate any actual, potential or perceived conflict of interest and/or commitment.

Sign:

Date:

Endorsement by manager:

Please complete your answers in block letters

I, *(insert full name)*:

have reviewed the disclosure (and plan where applicable) and:

(Delete as appropriate)

- Believe that a plan to manage the conflict of interest is not required and that no further action is necessary in relation to this matter
- Believe that the plan outlined in the disclosure will mitigate or remove the conflict of interest but will continue to monitor the situation
- Cannot adequately resolve the conflict of interest with the staff member concerned and have referred the matter to the Head of this Division for resolution

Sign:

Date:

Review by Executive Director, People, Culture & Brand / General Counsel & Company Secretary / Chief Executive Officer

Please complete your answers in block letters

I, *(insert full name)*:

have reviewed the conflict-of-interest disclosure (and plan) and have taken the following action in relation to this matter:

Sign:

Position:

Date:

Corporate Behaviour / Reputation

Please check the boxes if the statement applies or provide additional information to support your disclosure.

- I have had an adverse finding about my character or conduct, including a finding relating to unethical conduct or collusion.
- I am charged with, and/or I have been convicted of, a criminal offence.
- I am associated with a 'Prohibited Entity' identified by the Department of Foreign Affairs and Trade on the [Consolidated List](#).
- I am a '[Politically Exposed Person](#)' (a person with a prominent public function) and/or I have any immediate family members or close associates who are 'Politically Exposed Persons'. OR
- I am or have an immediate family or close associate who is a 'Politically Exposed Person', disclosed below, but the 'Politically Exposed Person' does not have sanctions or criminal convictions recorded against their name. NAME:

Additional information:

Signed:

Name:

Date: