

Conflict of Interest Policy	Effective date	May 2021
	Next review date	May 2023
	Sponsor	Chief Financial Officer
	Board committee	Governance Committee
Level / Class Corporate Organisation	Approval / authorisation	Board

1. PURPOSE

This policy states AVI’s position on conflict of interest, including the requirement that conflicts of interest are avoided wherever possible, or:

- identified and declared; and
- actively managed.

AVI personnel will encounter conflict of interest situations and AVI acknowledges that conflicts will not always be able to be avoided. They must however be identified and appropriately managed to ensure we earn and maintain the highest levels of integrity and trust in AVI and our Programs.

2. SCOPE / PERSONS AFFECTED

The Conflict of Interest Policy applies to all AVI personnel (defined for the purposes of this policy as: employees, consultants, contractors, office volunteers, interns, the AVI Board, or anyone engaged to undertake work for the organisation). All of the aforementioned must comply with the provisions of this policy.

Appropriate consultation (tick for ‘yes’, otherwise leave blank)

3. PRINCIPLES

A conflict of interest arises from a conflict between the performance of official work duties and a private or personal interest.

A personal interest includes the private, professional or business interests of a person, or of the individuals or groups with whom they have a close association, such as relatives, friends or even acquaintances.

A conflict of interest may be actual, perceived or potential.

- **Actual:** an actual conflict of interest occurs when there is a conflict between a person’s official duties and responsibilities in serving the public interest, and their personal interest.

- **Perceived:** a perceived conflict of interest occurs when a reasonable person, knowing the facts, would consider that a conflict of interest may exist, whether or not this is the case.
- **Potential:** a potential conflict of interest occurs where a person has a personal interest that could conflict with their official duties in the future.

4. POLICY

Conflicts of interest arise when an individual's other interests conflict, or could be seen to conflict with duties or obligations to AVI. A conflict of interest may affect or may appear to influence judgment and an individual's capacity to do their job independently. If undisclosed they may cause an individual to act unlawfully. This could be deemed unethical and it might breach an expressed or implied term of the individual's contract of employment; or damage AVI's reputation and/or its interests.

AVI personnel are responsible for openly declaring any matters of private interest that may be in conflict with the performance of work duties. In order to avoid a conflict of interest scenario, either real or perceived, AVI personnel must:

- Not use inside information, commercial in confidence information, resources, status, power or authority properly, in order to gain, or seek to gain, a benefit or advantage for themselves or others.
- Always be objective and impartial, and demonstrate this objectivity and impartiality in all matters and dealings (including in procurement decisions)
- Refrain from undertaking any activities (including employment) outside working hours that might, in any way, compete either directly or indirectly with the activities of AVI or which restrict personnel's ability to fulfil the duties of their position at AVI.
- As soon as practicable, declare any situation which could reasonably constitute a conflict of interest.

5. BREACH OF POLICY

Failure to disclose a **potential or actual** conflict of interest is a breach **of this Policy and the AVI Code of Conduct**. **If substantiated and depending on the nature of the breach**, it may result in disciplinary action, **up to and including termination of employment**.

6. DEFINITIONS

Conflict of interest:	A conflict of interest is where an AVI personnel has that could improperly influence, or be seen to influence, their decisions or actions in the performance of their official duties.
Actual conflict of interest:	there is a real conflict between an AVI personnel's official duties and private interests.
Potential conflict of interest:	an AVI personnel has private interests that could conflict with their official duties. This refers to circumstances where it is foreseeable that a conflict may arise in future and steps should be taken now to mitigate that future risk.



Perceived conflict of interest: the public or a third party could form the view that an AVI personnel’s private interests could improperly influence their decisions or actions, now or in the future.

7. RESPONSIBILITIES

AVI personnel are responsible for avoiding wherever possible or identifying, declaring and managing any actual, potential or perceived conflict of interest that applies to them.

AVI managers must provide leadership in implementing and giving effect to this Policy and take appropriate action for breaches. Facilitate compliance with this Policy. Participate in conflict of interest resolution with those they supervise and report breaches of this Policy to the CEO and People and Culture.

CEO, Board and Subcommittee members should retain awareness when conflicts of interests arise to ensure conflicts are disclosed and resolved with all pertinent details recorded in the meeting minutes.

8. RELATED POLICIES

AVI Staff Code of Conduct
Whistle-blower Policy
AVI Enterprise Agreement 2014
Complaint Handling Policy
AVI Transparency Statement

9. REVISION HISTORY

Date	Revision Number	Change(s)	Reference Section(s)
Feb 2019		1 st Version of policy	
Feb 2021		2 nd version of policy	