

CONFLICT OF INTEREST POLICY

1. PURPOSE

The purpose of this policy is to help the Board and staff of ADI to effectively identify, disclose and manage any actual, potential or perceived conflicts of interest in order to protect the integrity of ADI in line with the organisation's Constitution, as well as to manage risk. ADI is committed to considering potential, perceived or actual conflicts of interest to ensure all operations are conducted equitably, transparently and in good faith.

This document sets out the measures to be employed to operate transparently and with no conflict of interest which facilitate a high level of quality in service for the benefit of the organisation, its clients, and stakeholders.

2. SCOPE

This policy applies to all Personnel and Partner Personnel, who are expected to be alert to any relevant conflicts of interest, and to declare any personal conflicts that may arise.

3. POLICY STATEMENT

Australian Doctors International Limited ('ADI') expects the highest standards of integrity, fairness and ethical conduct, on the part of all paid and unpaid Personnel. The expected standard of integrity requires that there is no undeclared conflict of interest at any level in ADI dealings and associations.

4. DEFINITIONS

Term	Definition
Conflict of Interest (actual or real)	A situation in which a person such as an officer or employee or a professional has a private and personal interest sufficient to appear to influence the objective exercise of his or her official duties, or where two differing interests may compete and it is not clear which interest will direct their behaviour.
Conflict of Interest (potential)	A situation which may develop into an actual conflict of interest if the individual were to hold particular official responsibilities in the future.
Conflict of Interest (perceived)	A situation whereby a reasonable person would think an individual's judgment is likely to be compromised due to competing or conflicting interests, including if the individual does not themselves think their judgment is likely to be compromised.
Declaration of Interest	A documented statement made by a relevant party about their interests which may reasonably form a perceived, potential or actual conflict of interest with their duties of office within the organisation.

Interests	An individual's self-interest (e.g. to achieve financial profit or avoid loss, or to gain another special advantage or avoid a disadvantage), the interests of the individual's immediate family, friends, or business partners, or the interests of an organisation in which the individual holds a position.
Personnel	Any employees, directors, volunteers, interns or contractors

5. PRINCIPLES

This policy document:

- Defines 'interest' and 'conflict of interest' with the purpose of identifying, clarifying and managing situations where they may arise.
- Embodies our guiding values of 'sincerity' and 'excellence' by providing clear principles and procedures to manage perceived or actual conflict of interest.
- Guides staff in identifying and managing perceived or actual situations of conflict of interest, and create accountability to do so.
- Decreases and manage the organisational risk of reputational damage which may occur with an actual or perceived conflict of interest.
- Maintaining confidentiality and Refraining from making improper use of information

All staff must exercise duty of care and comply with the following responsibilities as required by law and as set out in ADI's policies and procedures:

- Acting in good faith and in the best interests of ADI
- Acting with due care and diligence
- Acting for a proper purpose and in keeping with the objects, mission and values of the organisation.
- Avoid conflicts of interest or duty

5.1 Transacting with related parties, third parties and close associates

Any member of staff who believes that they have witnessed a conflict of interest or believes there is a potential for conflict of interest should report the matter to their immediate manager at the earliest opportunity.

Any member of staff who suspects a conflict of interest may instead make a protected whistleblower disclosure as set out in the Whistleblower Policy.

6. RESPONSIBILITIES

Position	Responsibilities
Board	<p>All members of the Board have a responsibility to put their ADI Board responsibilities and the interests of the organisation above their outside interests.</p> <p>Board members who feel they are unable to do this in relation to particular decisions will recuse themselves from voting on those decisions.</p> <p>Board members have a duty to keep private and confidential the dealings and information from board meetings of ADI and organisation business.</p> <p>In the case of a previous or ongoing conflict of interest situation involving a Board Member which is real or perceived, the Board must evaluate the situation and respond to it.</p>
CEO and Employees	<p>ADI confers on all employees responsibility to avoid and declare situations of actual, potential, or perceived conflict of interest. Employees are required to declare an interest to their line manager or HR Manager, who will assist them in determining what, if any, action is required.</p> <p>In the case of a previous or ongoing conflict of interest situation which is real or perceived, the CEO and Executive Committee must evaluate the situation and respond to it.</p>

7. POLICY REVIEW

ADI is committed to ongoing improvement and out-of-cycle reviews of this policy may be deemed necessary if risk patterns are identified through ADI's Risk Management processes. This policy will be reviewed once every two years or when the Risk Management Framework has identified areas of high risk that require a policy change.

8. RELEVANT LEGISLATION

Legislation	Jurisdiction
<i>Corporations Act 2001</i> (Cth)	Australia
<i>ACNC Act 2012</i>	Australia