

## CONFFLICT OF INTEREST POLICY AND PROCEDURE

**Purpose:** To ensure all staff understand how to identify, declare, and manage conflicts of interest when working with all clients, but especially any Federal or State Government departments.

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### 1. WHAT THIS POLICY IS FOR

Our business supplies, installs, and supports audio-visual equipment for Federal and State Government departments. We value our democratic institutions and anti-corruption safeguards; therefore, we must operate with transparency, fairness, and integrity.

This policy explains how to spot a conflict of interest and what to do if one occurs, and is written to align with:

- Government Procurement Policy Frameworks
- Any other relevant Government requirements relating to integrity and conflicts of interest.

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### 2. WHO THIS APPLIES TO

This policy applies to:

- All employees
- All subcontractors
- All directors/owners

Everyone involved in our work with Government departments must follow these rules.

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### 3. WHAT A CONFLICT OF INTEREST IS

A conflict of interest happens when personal interests, relationships, or activities could influence – or appear to influence – decisions made for NSW Government work.

Conflicts may be:

- **Actual** – a real conflict exists now
- **Potential** – a conflict could happen in the future
- **Perceived** – it looks like a conflict, even if none exists

Examples include:

- Having a family member who works for, or bids for work with, the same Government department
- Personal relationships with a government staff member involved in procurement or decision-making
- Receiving or giving gifts, benefits, or hospitality that could influence decisions
- Outside business interests that could interfere with fair dealing
- Working on a job where you could personally benefit from decisions made

If in doubt, treat it as a possible conflict and report it.

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#### 4. HOW TO REPORT A CONFLICT OF INTEREST

If you suspect there is a conflict of interest – actual, potential, or perceived – you must report it **as soon as possible**.

You can report it:

- Verbally to your direct manager
- By email to your direct manager

After receiving the report, the manager may request a **written confirmation** if needed.

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#### 5. WHAT HAPPENS AFTER A CONFLICT IS REPORTED

1. **Manager reviews the situation**
  - The employee's direct manager will investigate the issue.
2. **CEO is notified**
  - The manager must inform the CEO of the potential or actual conflict.

### 3. ASSESSMENT

The manager will consider:

- How serious the conflict is
- Whether it affects current or future work
- Whether it needs immediate action

### 4. DECISION

The manager and CEO will agree on what needs to happen next.

All steps will be documented.

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## 6. WHAT ACTIONS MIGHT BE TAKEN

If a conflict of interest is confirmed, actions may include one or more of the following:

- **Disclosure to the NSW Government department** as required by the NSW Procurement Policy Framework
- **Reassignment of work** so the conflicted person is removed from the affected project
- **Increased oversight or controls**
- **Training or coaching**
- **Disciplinary action**, which may include:
  - A formal warning
  - Suspension
  - Termination of employment or subcontracting agreement (depending on severity)
- **Review of our internal policies and practices** to prevent similar issues in the future

We treat any non-disclosure of a conflict seriously.

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## 7. Expectations for Staff

Everyone covered by this policy must:

- Be alert to possible conflicts

- Act honestly and in the best interests of the company and our NSW Government clients
- Declare conflicts immediately
- Follow directions given to manage or resolve a conflict
- Not misuse confidential or sensitive information

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## **8. RECORDS AND PRIVACY**

All reported conflicts, investigations, and outcomes will be recorded and stored securely. Information will only be shared with those who need it for management, compliance, or NSW Government disclosure requirements.

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## **9. POLICY REVIEW**

This policy will be reviewed regularly to ensure it meets NSW Government expectations and continues to protect the integrity of our work.

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