

CONFLICT 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.

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.
-

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.

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.

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.

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.

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.

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
-

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.

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.
