



Conflict of Interest Policy for Abilifly Support Services

Overview

Every employee owes a duty of loyalty to the employer. This duty arises from the employee's employment contract.

Employees of Ericks and Fredericks International Consulting Pty Ltd T/a Abilifly Support Services must not act in a manner contrary to the interests of Abilifly Support Services. Where there is a conflict between an employee's personal interests or the interests of Abilifly Support Services, the latter must prevail.

Purpose

This policy provides guidance on the management of conflicts of interest in relation to employees and contracted staff of Abilifly Support Services..

Application

This policy applies to all employees. For the purpose of this policy, an "employee" includes:

- (a) permanent employees (including full time and part time);
- (b) fixed-term employees;
- (c) casual employees; temporary agency staff; and
- (d) contractors, engaged by Abilifly Support Services.

What is a conflict of interest

- (a) A conflict of interest arises where the interests of employees are different to, and conflict with, the interests of Abilifly Support Services. A conflict of interest exists when it is likely that an employee could be influenced, or could be perceived to be influenced, by a personal interest in carrying out the duties as an employee of Abilifly Support Services.
- (b) For the purposes of this policy, a reference to a "conflict of interest" includes:

- (i) actual conflicts of interest;
 - (ii) potential conflicts of interest; and
 - (iii) situations that may give rise to an appearance of conflicts of interest.
- (c) Employees must be particularly sensitive to potential conflicts of interest, and situations that could be perceived as a conflict of interest, due to the public interest in Abilify Support Services.
- (d) Conflicts may not necessarily be personal to employees. Conflicts of interest may arise where the interests of family, friends or close personal or business associates or business partners of employees conflict with those of Ericks and Fredericks International Consulting Pty Ltd T/a Abilify Support Services.

What are some examples of situations where a conflict of interest may exist?

Conflicts of interest arise in a variety of circumstances

- (a) Because a conflict of interest can arise in a wide variety of circumstances, it is not possible to detail every situation that may lead to a conflict of interest.
- (b) However, some examples of actual or potential conflict situations are set out below.

Personal interest in third parties

- (a) A conflict may arise where an employee has a personal interest in a third party which has a business relationship with Ericks and Fredericks International Consulting Pty Ltd T/a Abilify Support Services. For example, an organisation that:
 - (b) conducts business with, or seeks business from, Ericks and Fredericks International Consulting Pty Ltd T/a Abilify Support Services;
 - (c) Ericks and Fredericks International Consulting Pty Ltd T/a Abilify Support Services seeks business from; or
 - (d) competes with Ericks and Fredericks International Consulting Pty Ltd T/a Abilify Support Services.
- (e) An employee will have a personal interest in a third party if the employee, or one of the employee's associates, is a director or shareholder of the third party.

Positions outside of Ericks and Fredericks International Consulting Pty Ltd T/a Abilify Support Services

In some cases, a conflict will arise where an employee has another paid or unpaid

position outside of Ericks and Fredericks International Consulting Pty Ltd T/a Abilify Support Services. This does not necessarily mean that such outside positions are prohibited, however employees must notify Ericks and Fredericks International Consulting Pty Ltd T/a Abilify Support Services of any such position before it is accepted, so that an assessment can be made of whether a conflict exists and, if so, how to manage it.

Employee and contractor referrals

An employee who introduces an associate to Ericks and Fredericks International Consulting Pty Ltd T/a Abilify Support Services as a potential employee must not be involved in the selection process. Ericks and Fredericks International Consulting Pty Ltd T/a Abilify Support Services should be informed of the situation, so that an assessment can be made of whether a conflict exists and, if so, how to manage it.

Procurement and business dealings

An employee who uses the employee's position at Ericks and Fredericks International Consulting Pty Ltd T/a Abilify Support Services to do business with a third party with which the employee, or the employee's associate, has an interest, may have a conflict. Ericks and Fredericks International Consulting Pty Ltd T/a Abilify Support Services should be informed of this, so that an assessment can be made of whether a conflict exists and, if so, how to manage it.

Accepting gifts and benefits

- (a) An employee who receives more than a token gift or benefit (including meals, hospitality, accommodation or travel, among other things) from a third party in connection with the employee's duties for Ericks and Fredericks International Consulting Pty Ltd T/a Abilify Support Services may have a conflict. Ericks and Fredericks International Consulting Pty Ltd T/a Abilify Support Services should be informed, so that an assessment can be made of whether a conflict exists and, if so, how to manage it.
- (b) For the purpose of this policy, a gift or benefit will be regarded as being more than token if its value is more than \$50.

Roles and responsibilities

Considering and avoid conflicts of interest

- (a) Each employee is responsible for ensuring that, in all of the employee's activities, the employee considers whether an actual or potential conflict of interest arises.
- (b) Employees must take all reasonable measures to avoid conflict of interest

situations arising.

Reporting conflicts of interest

In some circumstances, it may not be possible to avoid a conflict of interest situation. There may be circumstances in which there is a reasonable basis on which to believe that a conflict of interest situation may arise, or in which there may be the appearance of a conflict of interest situation. In each of these circumstances, an employee must immediately disclose the conflict to Ericks and Fredericks International Consulting Pty Ltd T/a Abilifly Support Services by:

- (a) emailing a completed to admin@abilifly.com.au (); and
- (b) copying the employee's manager on the email.

Reporting changes in conflicts of interest

- (a) Where a conflict of interest situation changes, an employee must immediately disclose the change by way of:
 - (i) emailing a completed to admin@abilifly.com.au (); and
 - (ii) copying the employee's manager on the email.
- (b) Where there is any doubt as to whether a conflict may exist, employees should seek guidance from their managers and, if necessary, approval from Ericks and Fredericks International Consulting Pty Ltd T/a Abilifly Support Services, before engaging in the activity that may constitute a conflict of interest.

How will conflict of interest situations be handled?

- (a) Conflict of interest situations will be dealt with by Ericks and Fredericks International Consulting Pty Ltd T/a Abilifly Support Services on a case-by-case basis.
- (b) The human resources department of Ericks and Fredericks International Consulting Pty Ltd T/a Abilifly Support Services will maintain a confidential register of potential conflicts of interest that have been disclosed to Ericks and Fredericks International Consulting Pty Ltd T/a Abilifly Support Services.
- (c) In many cases, Ericks and Fredericks International Consulting Pty Ltd T/a Abilifly Support Services may not require anything to be done after the interest is disclosed. However, in some cases Ericks and Fredericks International Consulting Pty Ltd T/a Abilifly Support Services may find it necessary to direct the employee to take actions. Actions may include undertaking alternative duties, disposing of the interest, or both.

A Breach of Policy

Failure to comply with the obligation to disclose actual or potential conflicts of interest may lead to disciplinary action being taken by Ericks and Fredericks International Consulting Pty Ltd T/a Abilifly Support Services, including warnings, termination of employment, or both. This action is in accordance with the Notification of Other Employment (including Volunteering) Declaration.

Further information

If you require additional information in relation to this policy, or you have any suggestions for improvement to this policy, please contact your manager.

Related Policy and Procedures

- Conflict of Interest Procedure and register
- Code of Conduct
- Gifts and Benefits Policy

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