

Wheatbelt Natural Resource Management Incorporated

Conflict of Interest Policy

Policy Name:	Conflict of Interest Policy
Policy Number:	2.2
Policy Version Number:	V2.0
Policy Category:	Operational Management
Contact Officer:	Chief Executive Officer
Date Approved by the Board:	7 th December 2018
Date of Last Review:	17 September 2015
Period Until Next Review:	36 months from the approved date or as required
Related Legislation:	1. Corporations Act 2001 (Commonwealth)
Related WNRM Policies or Procedures:	1. 2.1 Code of Conduct Policy 2. Declarations of Interest form

1. Definitions:

“**Board Director**” means Board member of the Board

“**Conflict of Interest**” means a situation, whether actual or perceived, that has the potential to undermine the impartiality of a person because of the possibility of a clash between the person’s self-interest and professional or public interest.

“**Representatives**” means Board Directors, employees, contractors or volunteers of Wheatbelt Natural Resource Management Incorporated.

“**Wheatbelt NRM**” means Wheatbelt Natural Resource Management Incorporated.

2. Overview:

This Policy relates to Conflict of Interest and the requirements for disclosure. Wheatbelt NRM is committed to dealing appropriately with any real or perceived Conflict of Interest issues that may occur involving its Representatives, to ensure that its reputation is not affected, it is not financially or otherwise disadvantaged, and inappropriate personal benefit is not supported.

Representatives who breach this Policy may be subject to disciplinary action.

3. Policy Statements:

- 3.1 Representatives are responsible for determining whether a Conflict of Interest exists.
- 3.2 Any Conflict of Interest, real or perceived, should be declared:
 - 3.2.1 To the interview panel when being considered for a position as a Representative; or
 - 3.2.2 To the deciding person when Representatives are being considered for allocation to a program or project; or
 - 3.2.3 To the presiding chair at the beginning of a meeting when the agenda is being reviewed or when Representatives first become aware of the topic where a Conflict of Interest may apply; or
 - 3.2.4 To the Chairperson of the Board when impacting the discussions of the Board; or
 - 3.2.5 To the Chief Executive Officer when impacting the general operations of Wheatbelt NRM business;

and the person(s) in question being presented the declaration will consider the Conflict of Interest and determine any action that may be required, such as removal of the matter from the agenda, or exclusion of the person making the declaration from the discussion or from voting.

- 3.3 Disclosure of a Conflict of Interest should be made promptly, fully and preferably in writing, which may include the Conflict of Interest being recorded in the minutes of a meeting.
- 3.4 Subject to 3.2, Representatives attending a meeting in which the subject relating to a confirmed pecuniary interest is being discussed:
 - 3.4.1 Will abstain from contributing to any deliberations, unless otherwise decided by the Board;
 - 3.4.2 May be required to exit the room during the deliberations at the discretion of the attendees; and
 - 3.4.3 Will not be able to be involved in the decision or voting process;

unless such pecuniary interest exist by virtue of the fact that the person is a member of a class of persons for whose benefit the association is established.

- 3.5 Where decisions regarding the purchase of goods and services could benefit the representative making the decision or their relative or close friend, or a business in which they or their relative or close friend has a financial interest, such a decision will be made by the Chief Executive Officer or the Board in the event of the Chief Executive Officer.
- 3.6 Where a relative or close friend of any Representatives is applying for a position within Wheatbelt NRM, those Representatives will absent themselves from the selection panel.

- 3.7 A Board Director will need to be aware of, and comply with, the provisions of the Corporations Act 2001 (Commonwealth) that reflects the common law duties expected of a Board Director, particularly Division 1 clauses 182, 183, 184, and Division 2 clauses 191 to 196.
- 3.8 Where the Conflict of Interest is considered to be of a minor nature, or is of a nature that is common to many Representatives, by agreement of the Board, Representatives may be allowed to participate in the deliberations, however they will not be able to vote or be part of the decision process. These circumstances will be recorded in the minutes of the meeting along with any decisions made.

4. Responsible Officers:

- 4.1 The Board, as part of its governance authority, is responsible for the approval and publication of this Policy, including the approval of any subsequent changes.
- 4.2 The Chief Executive Officer is responsible for the operational compliance of the organisation to this Policy.
- 4.3 Representatives are responsible for the full disclosure of any real or perceived Conflict of Interest.

5. Approval:

This Policy was approved by the Board on the 7th of December 2018

Debra Rule
Chairperson
Board
Wheatbelt Natural Resource Management Incorporated