

Conflict of Interest Policy for Policy Performance Pty Ltd

Purpose

The purpose of this policy is to ensure that all actual, potential or perceived conflicts of interest (COI) are identified, declared, and managed in a transparent and consistent manner across all activities undertaken by Policy Performance Pty Ltd.

We are committed to:

- protecting the integrity and objectivity of our work
- maintaining the trust and confidence of our clients and stakeholders
- complying with relevant legal, ethical and contractual obligations
- ensuring that employees, subcontractors and management understand their responsibilities in recognising, declaring and managing conflicts of interest.

Objectives

Policy Performance Pty Ltd is firmly committed to ensure that it's employees and subcontractors are aware of their obligation to disclose any COI that they may have, when we are considering or undertaking work with our clients.

We are committed to complying with:

- Commonwealth Supplier Code of Conduct (July 2024)
- relevant provisions under the Public Governance, Performance and Accountability Act 2013 (Cth)
- applicable State or Territory legislation on conflict of interest and public sector engagement
- any additional client-specific codes of conduct or requirements communicated as part of a contract.

Scope

This policy applies to all employees and subcontractors associated with Policy Performance Pty Ltd.

Definition of conflicts of interest

A COI arises when an individual's personal, professional or financial interests have the potential to improperly influence or be perceived to influence their decisions or actions in the course of their work with Policy Performance Pty Ltd.

Conflicts can be:

- **Actual:** where a direct conflict exists between personal interests and professional duties
- **Potential:** where a personal interest could reasonably be foreseen to conflict with professional duties in the future
- **Perceived:** where an outside party could reasonably perceive that a conflict exists, even if no actual conflict is present.

COI may arise from relationships, prior employment, personal affiliations, financial investments or any circumstance that could affect impartiality and objectivity in performing work duties.

Responsibilities

Management

Policy Performance's management is responsible for:

- establishing and maintaining clear processes for identifying, disclosing and managing COI
- providing employees and subcontractors with appropriate guidance, tools and training to recognise and disclose COI
- reviewing all COI declarations promptly and determining appropriate management strategies
- developing and monitoring tailored COI management plans where required
- promptly communicating any disclosed or newly identified COI to clients, both during the bid or tender submission process and at any point during the contract period if any new conflicts arise
- ensuring that all declared conflicts and management actions are documented within internal governance records
- periodically reviewing COI risks and mitigation strategies to maintain transparency and compliance with relevant standards and legislation.

Employees

All employees of Policy Performance are individually responsible for:

- identifying and disclosing any actual, potential or perceived COI as soon as they become aware of it
- completing a COI declaration using the form provided by Policy Performance within the stipulated timeframe
- promptly notifying management of any COI so it can be assessed and communicated to the client during bid submissions or project delivery
- actively participating in the development and implementation of COI management plan to manage or resolve any declared COI
- ensuring that no COI exists other than those disclosed
- advising management of any changes in personal or professional circumstances that may affect an existing COI or create a new one
- participating in any COI reviews and contributing to the ongoing review of risk management strategies

Subcontractors

All subcontractors engaged by Policy Performance must:

- disclose any actual, potential or perceived COI relevant to the work they are contracted to undertake, as soon as practicable
- complete the required COI declaration before commencing any work with Policy Performance, including declaring any conflicts during bid writing/submission process
- promptly inform Policy Performance of any COI that arises prior to or during the engagement, to ensure it can be assessed and, if necessary, communicated to the client

- cooperate with Policy Performance management in developing appropriate strategies to manage any identified COI
- notify Policy Performance immediately of any changes in circumstances that may create a new COI or alter an existing one
- Comply with any agreed conflict management measures or plans as a condition of the engagement.

Process

Our consistent and structured approach includes the following steps:

Step 1: Identification and declaration

For every bid and client engagement, all employees and subcontractors engaged by Policy Performance must:

- assess any situations related to the prospective bid, client or engagement that may give rise to an actual, potential or perceived conflict of interest (see [Annexure A](#) for examples)
- disclose any such conflict, including the proposed management plan, by completing the COI declaration form ([Annexure B](#)) provided by Policy Performance within the stipulated timeframe
- provide clear and comprehensive information to support the assessment of the conflict, including relevant details on the nature, parties involved and potential impact
- submit the declaration form promptly to enable timely assessment and determination of whether the conflict can be effectively managed or if further steps such as withdrawal from the bid or engagement are required.

Step 2: Review and Assessment

All conflict declarations are reviewed by our Relationship and Account Manager (Charlie Tulloch), who assesses:

- the nature and source of the conflict
- the likelihood and severity of the conflict's impact on the integrity of the project
- whether the conflict can be appropriately managed.

Step 3: Management

Where a conflict is identified, a tailored conflict management plan will be developed in consultation with the declarant. Depending on the risk severity, the management strategy involves one or more of the following actions:

- monitoring: ongoing oversight of the person's involvement to ensure impartiality
- restricting: limiting access to information or decision-making roles
- reassigning: transferring responsibilities to another team member to avoid influence
- removing: excluding the individual from the project or certain phases of it
- relinquishing: requiring the individual to divest interests or withdraw from conflicting commitments.

Step 4: Client engagement

All conflicts, along with corresponding management strategies, will be documented and disclosed within tender submission forms to the contracting entity.

Any new conflicts arising during a contract are promptly communicated to the client.

Step 5: Documentation

All COI declarations and management actions are recorded in our internal governance system and updates or reports are provided to clients where requested.

Compliance to this policy

Failure to comply with this policy may result in:

- disciplinary action for employees
- termination of subcontractor agreements
- legal consequences where applicable.

Monitoring and review

Policy Performance Pty Ltd will review this policy annually, in consultation with employees by:

- assessing the effectiveness of the policy and its implementation
- reviewing the nature and management of declared COI over the preceding period
- monitoring compliance with the policy and the adequacy of management strategies applied
- identifying any trends or recurring issues that may require updates to the policy, processes or training
- ensuring ongoing alignment with relevant legislation, ethical standards and client requirements.

Authorised

Name: Charlie Tulloch

Position: Director, Policy Performance Pty Ltd

Signature: 

Date: 1 July 2025

Date of next review: 1 July 2026

Annexure A: Examples to identify conflicts of interest

When working with Policy Performance, it is your responsibility to assess whether any personal, professional or financial circumstances may create a COI in relation to a bid, project or client. Below are common examples to help you identify when a conflict may exist.

Personal relationships:

You have a close personal, family or friendship connection with someone who works for the client or the funding body involved in the bid or project.

Previous employment or engagements:

You previously worked for the client organisation or with the funding body, which may influence your judgment or be seen to affect your impartiality.

Financial interests:

You or a family member have shares, investments or a financial stake in the client organisation or a business that could benefit from the outcomes of the project.

Multiple roles or commitments:

You are currently working, consulting or advising on other projects with organisations that have a competing or overlapping interest in the bid or engagement.

Access to confidential information:

You have access to confidential or sensitive information from a past employer, client or associated entity that could impact your current role or create an unfair advantage or disadvantage if not properly managed.

Gifts, benefits or hospitality:

You have received or been offered gifts, benefits or hospitality from the client, their representatives or stakeholders connected to the project that could influence or appear to influence your decisions.

Personal bias or advocacy:

You have strong personal views or advocacy positions on a policy, industry or issue that is directly related to the client's work, which could affect your impartiality.

Professional associations:

You hold a formal position (such as a board member, advisor or committee member) with an organisation related to the client's sector, which could create competing interests.

If You Are Unsure

If you are unsure whether your situation presents a conflict, you should prioritise transparency on the side of caution and disclose it using the COI declaration form. Management will assess the situation and advise whether it constitutes a conflict and how it should be managed.

Disclosure protects you, the organisation and our clients by ensuring transparency and safeguarding the integrity of our work.

Annexure B: COI declaration form

Declarant's details

Full Name:

Email Address:

Contact Number:

Role Title:

Are you an (select one):

- Employee
- Subcontractor

Conflict details

Date conflict of interest identified:

Type of conflict (tick all that apply):

- Actual: a current conflict of interest exists
- Potential: there is a reasonable likelihood of a conflict arising in the future
- Perceived: others may perceive that a conflict exists, even if it does not

What does the conflict relate to? (tick all that apply):

- Shareholdings or financial interests
- A formal position held in a company (e.g. directorship, partnership)
- Business interests such as owning or operating a business
- Personal relationships (relatives, close associates, partners, friends)
- Prior employment with the client, funding body or related stakeholders
- Engagements or consulting work with competing or overlapping organisations
- Access to confidential or sensitive information from prior engagements
- Gifts, benefits or hospitality received from a client, stakeholder or competitor
- Other (please specify): _____

Describe the conflict of interest:

Proposed management plan by the Declarant

- Monitor: Ongoing oversight and supervision
- Monitor: Periodic review of involvement
- Restrict: Limit access to sensitive information or decisions
- Restrict: Restrict involvement to advisory capacity only
- Restrict: Prevent interactions with specific clients, stakeholders or competitors
- Reassign: Transfer of duties to another team member
- Reassign: Reallocation to a different project or task
- Remove: Exclude from specific meetings, discussions or decision-making processes
- Remove: Remove access to certain documents, records or systems
- Relinquish: Divest financial interests or step down from conflicting roles
- Other measures (please specify):

Provide any specific details of management strategy:

Additional document (optional)

Share any additional documents related to this declaration.

Acknowledgement

I declare the following:

- I declare that the information provided is true and correct to the best of my knowledge.
- I understand that I must submit an updated declaration if my circumstances change.
- I understand that any conflicts declared will be communicated to relevant clients if required.
- I acknowledge that I will discuss the proposed management plan for any declared conflict(s) with Policy Performance's Relationship and Account Manager to agree on appropriate management actions.

SIGNATURE:

DATE: