
1 Conflict of Interest

POLICY NUMBER

GTO 2.5

POLICY GROUP

Group Training – Risk Management

RELATED POLICIES AND REFERENCES

[GTO 2.2 National Standards for Group Training Companies](#)

[GTO 3.3 Code of Conduct](#)

2 What is a Conflict of Interest?

Conflict of interest risks are an inevitable fact of organisational life, and can arise without anyone being at fault. Problems can arise where these risks are not properly managed.

The management of risk associated with any actual, potential or perceived conflict of interest situation is fundamental to ensuring the highest levels of integrity and trust are achieved and maintained.

Types of Conflicts of Interest

Conflicts of interest are conflicts between company duties and private interests. These can be actual, potential or perceived.

An actual conflict of interest is one where there is a real conflict between an AFL SportsReady employee's duties and responsibilities, and their private interests.

A potential conflict of interest arises where an employee has private interests that could conflict with their AFL SportsReady duties.

A perceived conflict of interest can exist where a third party could form the view that an employee's private interest could improperly influence the performance of their duties, now or in the future.

A conflict of interest can arise from avoiding personal losses, as well as gaining personal advantage —

All conflicts of interest whether direct or indirect, actual or potential, pecuniary or nonpecuniary are captured by this policy.

This policy gives a proactive mechanism for handling such situations.

This policy gives compliance to the Corporations Act 2001 and the National Group Training Standard No8.

Policy

Responsibilities of the Organisation

The best interests of the company as a whole are paramount to other interests of third parties, individual stakeholders, directors, employees or associates.

AFL SportsReady has the responsibility to comply with the legislation and intent of the Corporations Act.

To promote and protect the image and reputation with stakeholders, employees and the general public that AFL SportsReady operates under ethical standards and sound business practices.

To avoid any dissent and unrest in decision-making through upfront publication of a transparent process to handle and record conflict of interest. The process will be concerned with major conflicts of interest of a material nature and this is, to some extent, a matter of judgment contingent upon whether the issue is of significant importance to the company.

Ensuring that AFL SportsReady's interest is not compromised should be the overriding objective of any conflict of interest management strategy. AFL SportsReady is responsible for:

- establishing a system for identifying and managing conflicts of interest in the form of detailed policies and procedures;
- building an organisational culture that supports implementation of all relevant policies through appropriate education, training and enforcement activities;
- reviewing relevant policies and procedures on a regular basis to ensure they are effective;
- receiving and investigating complaints regarding possible breaches of conflict of interest policies;
- monitoring compliance with conflict of interest policies, including responses to alleged breaches.

Responsibilities of the Board of Directors and Managers

The Board of Directors and Managers:

- shall not have a personal interest or engagement with a third party except with the fully informed consent of the company.
- shall not misuse their position or knowledge within the company for personal or professional gain, profit or advantage except with the fully informed consent of the company.
- shall not misappropriate the company's property or knowledge for their own or a third party's advantage or usage except with the fully informed consent of the company.
- shall give notice of any material personal interest or involvement relating to any affairs of the company.

The Board of Directors and Managers; or employees within the company able to make, influence or participate in decisions are responsible for:

complying with conflict of interest policies with respect to their own conflicts and potential conflicts of interest facilitating the compliance of those they supervise by:

- being aware of the risks of conflicts inherent in the work of the staff they manage;
- making staff aware of relevant policies and procedures;
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