

Purpose

1. The purpose of this policy is to ensure that actual, potential and/ or perceived conflicts of interest are identified, disclosed and managed effectively.

Scope

2. This policy applies to eviDent Board and Committee members, employees, volunteers, eviDent researchers, contractors and consultants.
3. eviDent researchers are also expected to manage conflicts of interest encountered in the course of eviDent research in accordance with their obligations under the Australian Code for the Responsible Conduct of Research, and eviDent Policy EP002 Membership

Definitions

For the purposes of this policy, the following definitions are used:

4. **Conflict of Interest:** a person's personal interest conflicts with their responsibility to act in the best interests of the eviDent Foundation.
5. **Actual Conflict:** a person is affected by a conflicting interest
6. **Perceived Conflict:** a person could appear to be affected by a conflicting interest
7. **Potential Conflict:** a person could be affected by a conflicting interest (in some circumstances)

General Principles

8. A conflict of interest may be actual, potential or perceived and may be financial or non-financial. These situations present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of the eviDent Foundation, and must be managed accordingly.
9. eviDent recognises that conflicts of interest commonly arise, and need not present a problem if they are openly and effectively managed.
10. It is the responsibility of the Board that ethical, legal, financial and other conflicts of interest should be avoided and that such conflicts (where they do arise) do not conflict with the obligations of eviDent.

Managing Conflicts

11. A conflict register will be maintained by the Company Secretary, and include information about:
 - a. Name
 - b. Description of interest
 - c. Date of disclosure
 - d. Steps taken for dealing with the conflict
 - e. Actions taken to address the conflict.

12. The Board is responsible for reviewing the conflict register on a regular basis and monitoring compliance with this policy.
13. eviDent requires that eviDent Board, Committee members, employees, volunteers, contractors and consultants:
 - f. avoid conflicts of interest where possible
 - g. identify and disclose any conflicts of interest
 - h. carefully manage any conflicts of interest; and
 - i. follow this policy, and respond to any breaches.
14. In the case of conflicts of interest identified by Board or Committee members, once the conflict of interest has been disclosed, the Board or Committee (excluding the person disclosing and any other conflicted Board or Committee members) will decide whether or not those conflicted members should:
 - j. vote on the matter (this is a minimum)
 - k. participate in any debate; or
 - l. be present in the room during the debate and the voting.
15. eviDent employees, volunteers, contractors and consultants must report any identified conflicts of interests to the Chief Executive Officer.
16. In exceptional circumstances, such as where a conflict is very significant or likely to prevent eviDent Board and Committee members, employees, volunteers, contractors and consultants from regularly participating in discussions, the Board or CEO may consider whether it is appropriate for the person conflicted to resign from their position.
17. In deciding what action to take to manage the conflict, the Board or Chief Executive Officer will consider:
 - m. whether the conflict needs to be avoided or simply documented
 - n. whether the conflict will realistically impair the disclosing person's capacity to impartially participate in decision-making
 - o. alternative options to avoid the conflict
 - p. eviDent's objects and resources; and
 - q. the possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of, eviDent.
18. If the Board has a reason to believe that a person subject to the policy has failed to comply with it, it will investigate the circumstances. If it is found that this person has failed to disclose a conflict of interest, the Board may take action against them. This may include seeking to terminate their relationship with eviDent.

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19. If a person suspects that eviDent Board and Committee members , employees, volunteers, contractors or consultants have failed to disclose a conflict of interest, they must:
- r. discuss it with the person in question; before they
 - s. notify the Chair of the Board (or Vice Chair in the instance it relates to the Chair) or Chief Executive Officer.

Implementation of this policy statement

20. If you have any questions about this Policy Statement please contact the Chief Executive Officer at eviDent Foundation on 8825 4600.

Review

21. This policy will be reviewed and updated within three (3) years of the issue date, or earlier if required.