

# Conflict of Interest Policy

## Purpose

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This Policy is designed to ensure all decisions taken by EIANZ are made in the best interests of the organisation and are free from actual or perceived conflicts of interest.

## Scope

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This policy applies to all members, CEnvPs, employees, and affiliates of EIANZ who are involved in decisions made on behalf of the organisation.

## Defining conflict of interests

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A 'conflict of interests' means any situation where an individual's decision-making capacity and/or impartiality could be affected by other interests, thereby compromising their neutrality and independence. There are three types of COI:

- *actual COI*: There is a direct conflict between the private interests of an individual, and the performance of official duties and responsibilities.
- *perceived COI*: It appears an individual's private interest could influence the performance of official duties and responsibilities – whether or not this is true.
- *potential COI*: An individual has private interests that could interfere with the performance of official duties and future responsibilities.

'Private interests' mean the following:

- *pecuniary interests*: These involve actual or potential financial gain or loss, and other material benefits or losses. Conflict arises when pecuniary interests affect the Panel's advice on a particular matter. Interests may result from: owning property, controlling shares, accepting gifts, or other sources of income.
- *non-pecuniary interests*: These do not have a financial or material aspect. They may rise from personal or familial relationships, or involvement in social, cultural or sporting activities, and include tendency towards favour from friendship, animosity or other personal involvement.

## Exceptions

The Associations Incorporation Reform Act 2012 ('the Act') includes some exceptions to what would be considered a material, personal, or pecuniary interest. These exceptions are as follows:

- a) a material personal interest that exists only because the member
  - i. is an employee of the association
  - ii. Belongs to a class of persons for whose benefit the association is established; or

- b) a material personal interest that the member has in common with all, or a substantial proportion of, members of the association

## Policy

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### Actual Conflicts of Interest

Any individual who has an actual material, personal, or pecuniary interest in a matter being discussed must disclose this interest at the beginning of the discussion. Upon disclosure, the individual must leave the room for the duration of the discussion and decision-making process on that matter.

### Potential and Perceived Conflict of Interest

Any individual who has a potential or perceived material, personal, or pecuniary interest in a matter being discussed must disclose this interest at the beginning of the discussion. The Chair will determine whether the conflict requires the individual to:

- Leave the room entirely, or
- Remain present but abstain from discussion and voting, or
- Participate under an approved conflict management plan

### Disputed Conflicts

If there is disagreement about whether a conflict exists, the Chair may seek input from other participants before making a final determination. The decision and rationale will be recorded in the minutes.

## Procedure

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### Default Management Procedure

- At the commencement of each meeting, the Chair will ask for any conflicts of interest to be declared.
- Participants must disclose any actual or perceived conflicts of interest at the start of the relevant discussion.
- Individuals with a disclosed actual conflict of interest must leave the meeting during discussions and decisions on the matter.
- Individuals with a perceived conflict of interest may stay in the meeting but must refrain from contributing to or voting on the matter.
- The Chair will ensure that the minutes accurately reflect any disclosures and actions taken concerning conflicts of interest.

### Alternative Management Procedure

- The Chair will assess whether a Conflict of Interest Management Plan is appropriate for the specific situation and individual involved.
- If deemed suitable, the individual with the conflict must prepare a written management plan that:
  - Details the nature and scope of the conflict of interest
  - Outlines specific strategies to mitigate potential bias
  - Identifies safeguards to ensure impartial decision-making

- The management plan must be submitted to the Chair for review and approval prior to the relevant discussion.
- An independent party may be appointed to review the management plan and monitor its implementation during discussions.
- The individual may participate in discussions under the approved management plan but must strictly adhere to the outlined mitigation strategies.
- The Chair will ensure that the management plan, its approval, and any monitoring activities are documented in the meeting minutes.
- The effectiveness of the management plan will be reviewed following the discussion to inform future conflict management decisions.

## Compliance

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Failure to comply with this policy may result in disciplinary action, including removal from the meeting or further sanctions as deemed appropriate by the EIANZ board.

## Review

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This policy will be reviewed as necessary by the EIANZ board to ensure its effectiveness and relevance. Updates or amendments will be made as necessary to address any emerging issues or changes in the organisational structure.

## Approval

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This Conflict of Interest Policy was approved by the EIANZ board on 30 June 2025 and is effective immediately.

For any questions or further clarification, please contact Central Office [office@eianz.org](mailto:office@eianz.org).

## Document control and review

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Version	Author	Date
First draft	Central Office	16 June 2025
Second draft		

## References

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- [The Associations Incorporation Reform Act 2012](#)
- [EIANZ Rules of Association](#)
- [EIANZ Code of Ethics and Professional Conduct](#)