

Interplast Australia & New Zealand

Conflict of Interest Policy

Policy Status:
Approved

Initial CEO Endorsement:	16 June 2025
Board Approval Date:	17 June 2025
Last Review Date:	
Future Review Date:	June 2027
Frequency of Review:	2 years
Policy Owner:	Board Support

Revisions to Policy

Significant Changes	Endorsed by CEO	Approved by Interplast Board
Initial creation (amalgamation of existing policies)	16 June 2025	17 June 2025

Section 1: Purpose & Scope

The purpose of this policy is to ensure all employees, volunteers, board of directors, committee members, working group members, company members and ambassadors (Interplast personnel) of Interplast Australia & New Zealand (Interplast) act ethically, without impropriety and in the best interests of the organisation. The intent is to assist Interplast in achieving fair, well-informed decision-making that is not influenced by any conflicts of interests, potential or real. A list of potential conflicts of interest can be found in Appendix A.

This policy should be read in conjunction with the Conflict of Interest Procedure and the Interplast Whistleblowing Policy.

The Conflict of Interest Policy applies to all Interplast employees, volunteers, board of directors, committee members, working group members, company members and ambassadors (Interplast personnel) and addresses conflict of interests that may be real or actual; apparent or perceived; potential or foreseen.

Consultants will declare any potential conflicts of interest as part of their contract.

Section 3: Policy

It is the policy of Interplast Australia and New Zealand (Interplast) and a responsibility of the Chief Executive Officer (CEO) and the Board of Directors that ethical, financial, legal or any other conflicts of interest be avoided and if any conflicts do occur, they do not conflict with the operations and obligations of Interplast.

To help prevent conflicts of interest (COI) from occurring and to manage potential or actual conflicts of interest, precautionary measures will be taken as follows;

Interplast personnel:

1. will always be alert to the need to identify situations where there is a potential conflict of interest;
2. will avoid entering into situations where a conflict of interest has been identified;
3. Identify and report any conflicts of interest as per the Conflict of Interest Procedure
4. will not accept valuable or otherwise inappropriate gifts in the course of their work with Interplast. They must disclose any material gifts or offers of gifts in value of more than \$100.00 for their personal use as outlined in the Conflict of Interest Procedure.
5. may not withhold information from Interplast for personal gain where doing so may be detrimental to Interplast
6. will not use Interplast resources (including Interplast letterhead paper, equipment and/or name) to conduct the business of a third party they are associated with
7. All board, company, working group and committee meetings will have a standing disclosure of conflicts of interests on the agenda
8. A register of conflict of interests will be confidentially maintained by the CEO

9. All Interplast personnel will sign an annual declaration that they understand the Conflict of Interest Policy and complete a Register of Interests form.
10. Disciplinary action up to and including dismissal may occur if in breach of this policy

When deciding what action to take in the management of conflicts of interest, Interplast will consider the following;

- whether the conflict needs to be avoided or simply documented
- whether the conflict will realistically impair the disclosing Director's capacity to impartially participate in decision-making
- alternative options to avoid the conflict
- Interplast's objects and resources
- the possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of, Interplast

Section 4: Monitoring and Review of this Policy

This policy will be monitored and reviewed at intervals as indicated in this policy and following the process outlined in Interplast's Policy Framework.

The Chief Executive Officer is ultimately accountable to the Board for managing and maintaining this policy and is responsible for the implementation of this policy. The Board is responsible for adopting this policy.

Board support is accountable to the Chief Executive Officer for ensuring the currency of this policy and all supporting procedures and relevant manuals and has responsibility for operationalising the policy.

Where compliance issues are identified, they will be addressed promptly. The Chief Executive Officer is responsible for taking any recommended amendments to this policy to the Interplast Board for its approval.

Section 5: Related Documents and Legislation

Name of document/legislation	Location/hyperlink
Conflict of Interest Procedure	Interplast key documents
Code of Conduct Policy	Interplast key documents
Whistleblowing Policy	Interplast key documents

Section 6: Definitions

Word / Phrase	Definition
Personnel	Personnel includes all employees, consultants, volunteers, Board Directors, Committee members, Working Group members and Ambassadors that are engaged by Interplast to perform the work of Interplast. Volunteers include both professional (e.g. administrative roles) and medical volunteers (e.g. surgeons, anaesthetists, nurses or allied therapists), students, interns, or any other person who has entered into a volunteer arrangement or agreement with Interplast.
Conflict of Interest	Occurs when an Interplast personnel's personal interests conflict with their responsibility to act in the best interests of Interplast. Personal interests include direct interests, as well as those of family, friends, or other organisations the Interplast personnel may be involved with or have an interest in. It also includes a conflict between an Interplast's personnel's duty to Interplast and another duty that the Interplast personnel has (for example, to another charity). A conflict of interest may be actual, potential or perceived and may be financial or nonfinancial. These situations present the risk that an Interplast personnel will make a decision based on, or affected by, these influences, rather than in the best interests of Interplast.

Section 7: Appendices

Appendix A: Examples of conflicts of interest

1. Assisting a third party in their dealings with Interplast which may result in the Interplast personnel gaining preferential treatment or favours from the third party.
2. Accepting gifts from a third party that undertakes work or provides services to Interplast.
3. Making deliberate misrepresentations of Interplast when dealing with a third party for personal gains either from the third party or by any other means.
4. Divulging information that is the intellectual property of Interplast to a third party without the permission of Interplast. Releasing this information may be for their personal benefit at the expense of Interplast.
5. Giving financial advice (e.g., legal and tax aspects of donations) to a financial donor of Interplast. Consequentially, the donor may be lured into donating based on the advice of the Interplast personnel rather than from independent sources.
6. Purchasing goods or services supplied by a family business, family company, relative or close friend of an Interplast personnel.
7. Managing the ongoing supply of goods or services provided by a family business, family company, relative or close friend of an Interplast personnel.
8. Negotiating for friends or relatives for them to provide goods or services to Interplast.
9. Making decisions in relation to whether a friend of family member is a recipient of any services provided by Interplast.
10. Involvement in the recruitment selection of a relative or friend as an employee of Interplast and not disclosing the acquaintance.
11. Being the manager of a friend, partner or family member also employed by Interplast.
12. Sale of an organisational asset to an Interplast personnel without an equitable process
13. Voting on a decision which directly affects an Interplast personnel's personal interests.
14. Knowing confidential information about Interplast that could impact personal interests.

Example of a perceived conflict of interest:

An employee reviews quotes for a new service and one of the potential providers is the employer of that employee's sibling. While the employee believes they can make an impartial decision in the best interests of Interplast, it could be perceived as being in their own interest.

Section 7: Appendices

Appendix B: Conflict of Interest Declaration & Register of Interests Form

Name:		
Position:		Date:

Declaration

I hereby declare that I have read and understood the Interplast Conflict of Interest Policy.

I agree to adhere to the precautionary measures stated in the Policy regarding the prevention and management of conflict of interests. I also confirm that I have declared all possible conflicts of interest in the following table, and that the information contained in this form is true and correct to the best of my knowledge.

I understand that if the information I have declared is false or if I have knowingly failed to declare information that results in a conflict of interest, I may be subject to disciplinary proceedings.

Signed:

Date:

This declaration form will be placed on your personnel file.

Section 7: Appendices

Appendix C - Conflict of Interest Policy



Register of Interests Form

Name:	
Position:	

Please complete the following table. If you answer 'yes' to any of these questions, please provide details below in the space provided.

Question	Yes	No
Do you hold an executive or director position with a third-party organisation? (The third party may or may not do business with Interplast)	Please name the other third parties you currently hold an executive or director position with	
What is your occupation? (for non employees)	Please state your occupation Please list your current place/s of employment	
Are you aware of any other circumstances that may pose a conflict of interest with your role at Interplast?	Please give details	