

## Conflicts of Interest Policy

### Introduction

This policy sets out the principles and rules for declaring and managing conflicts of interest at ARIA. ARIA's objective is to ensure that the influence of third parties does not compromise our decision making or independent judgement. This policy is applicable to anybody working with ARIA.

This policy applies to all interests, whether financial or non-financial, whether potential or realised, that could interact with your responsibilities to ARIA.

It is important to note that the application of this policy will require the exercise of judgement. This is because conflicts are, by their very nature, dependent on the particular facts of each case. What might cause a conflict for one person at ARIA might not cause a conflict for another. For that reason, it is not possible to provide an exhaustive list of what would, and would not, constitute a conflict of interest.

ARIA is reliant on you approaching the issue of conflicts of interest in good faith and exercising good judgement. Each of us is responsible for managing our own conflicts of interest and protecting ARIA's important work from real or perceived impropriety.

### Identifying Conflicts

#### Some definitions

Conflict of Interest	means a set of circumstances that creates a risk that an individual's ability to apply judgement or act in one role is, or could be, impaired or influenced by a secondary interest. It can occur in any situation where an individual or organisation can exploit a professional or official role for personal or other benefit (for themselves or a Connected Party);
Perceived Conflict of Interest	means a situation in which <i>a third party observer may come to the reasonably held view that you have a Conflict of Interest;</i>
Connected Party	means your: <ul style="list-style-type: none"> <li>a. spouse, civil partner, or unmarried partner;</li> <li>b. sibling;</li> <li>c. child;</li> </ul>

	<ul style="list-style-type: none"> <li>d. parent; or</li> <li>e. anyone else whose relationship to you could impair your ability to make fair and unbiased decisions in your role at ARIA, or may reasonably be perceived to do so;</li> </ul>
Recuse	to disqualify yourself as a judge in a particular case, or to remove yourself from participation in a particular forum, to avoid a conflict of interest; and
Validate	when an unconflicted colleague, or other alternate, shadows your decision-making to validate that you have followed due process.

### How to approach a conflict of interest self-assessment

So long as you are complying with this policy, there's no mandatory way to approach the process for identifying conflicts of interest. What works best will depend on you, your role at ARIA, and your outside interests. That said, here are some helpful questions to get you started:

1. What decisions am I responsible for making at ARIA? What decisions might I reasonably be able to influence?
2. Can I think of any outside interest that I - myself - hold, or might soon hold, that:
  - a. might influence how I make those decisions or exert that influence?; or
  - b. a reasonable person might think would put my decision making or objectivity at risk?
3. Can I think of any outside interest that one of my Connected Parties holds, or might soon hold, that:
  - a. might influence how I make those decisions or exert that influence?; or
  - b. a reasonable person might think would put my decision making or objectivity at risk?
4. Adopting a stance of cautious over-inclusivity, is there anything that might not fall into the questions above that might be worth disclosing anyway or which would benefit from discussion with a trusted colleague?

## Process

### When to disclose

You are required to disclose any Conflicts of Interest or Perceived Conflicts of Interest:

1. that exist at the commencement of your engagement with ARIA;

2. which arise during the course of your engagement with ARIA (including any periods of absence); and
3. which seem reasonably likely to arise during the course of your engagement with ARIA (including any periods of absence).

You should make disclosure on the first day of your engagement with ARIA, and in any other case as soon as possible following the point at which you reasonably believe that a conflict has or is likely to arise. Non-disclosure of a Conflict of Interest or Perceived Conflict of Interest could constitute a breach of contract or lead to disciplinary action.

You may be required to complete extraordinary disclosure exercises from time-to-time. For example, ARIA may wish to ask all employees, workers, secondees, and consultants to submit disclosure forms (including nil returns) at the end of a particular financial year to check the levels of compliance with this Policy across the organisation.

### **How to disclose**

Information about how to disclose any Conflicts of Interest or Perceived Conflicts of Interest will ordinarily be included in the onboarding materials you receive at the start of your engagement.

You can use the links on ARIA's intranet to find the form for disclosing information relating to Conflicts of Interest and Perceived Conflicts of Interest.

You can access the form and make a disclosure at any time. ARIA shall treat submissions in accordance with the privacy policy applicable to that person's personal data.

## **Management of conflicts**

If you report a Conflict of Interest or Perceived Conflict of Interest, ARIA will consult with you to understand the situation in more detail and what mitigations might be effective and proportionate.

Following this process, ARIA will either: (i) communicate to you in writing that ARIA does not believe the situation represents a Conflict of Interest or Perceived Conflict of Interest; or (ii) propose a conflict management plan. ARIA will endeavour to agree a final version of the conflict management plan with the conflicted individual. If agreement cannot be reached, ARIA will finalise the conflict management plan in consultation with the CEO or a Non-Executive member and provide the conflicted individual with a copy. Any conflict management plan will be reviewed, updated and re-approved from time-to-time as the circumstances demand.

Mitigations will differ depending on the nature of the situation and the category of person involved.