

Conflicts of Interest Policy

1. REVIEW

Review of this policy will occur every	3 years
Approval Level Required of amendments to this policy by	GRE
Policy Owner	Director of People and Technology
Required on Website?	Yes

VERSION LOG

Note: *Where amendments are only approved by ELT and not in line with Approval Level noted in the table above because the nature of the amendment is minor, the existing Next Review Due Date must be retained to ensure review occurs by the appropriate Approval Level.

Version	Author/s	Approved By*	Approval Date	Next Review Due	Comments
V1	People & Culture	GRE	Aug 2020	Aug 2023	
V2	People & Culture	ELT	Apr 2023	Aug 2023	Update to remove reference to COO
V3	UA Legal Lead	ELT GRE	Nov 2023 Feb 2024	Aug 2026	Various changes to the Conflict of Interest and Implementation sections, and removal of the Ethical Fundraising section

2. POLICY STATEMENT

At UNICEF Australia we are dedicated to protecting and upholding our reputation as an organisation with the highest ethical standards. Our dealings internally, and with all external parties are conducted honestly and with integrity.

We are all ambassadors for our Values and we are committed to ensuring our business practices are ethical, legal, straight forward and transparent. We are respectful of, and compliant with, the laws in all parts of the world in which we operate and our reputation is at the core of everything that we do.

3. PURPOSE

This policy sets out the minimum standards of conduct that are required from all UNICEF Australia (UA) Representatives: staff, consultants and volunteers, and applies to anyone who acts on behalf of UA, whether in a paid or unpaid capacity.

This policy supplements the UA Code of Conduct and interacts with other policies which may be amended from time to time.

This policy does not form a contract or part of UA's contract of employment and UA may vary the contents of this policy from time to time. To the extent that the policy requires employees to do or refrain from doing something, this forms a direction of UA with which employees must comply.

4. GUIDING PRINCIPLES

Our Values are the fundamental drivers of our behaviour.

This includes:

- Demonstrating behaviour that is consistent with our Values
- Role modelling a culture of sound ethical conduct
- Creating an environment where people feel comfortable in raising concerns and “speaking up”
- Recognising and rewarding good behaviour and taking action to address behaviours inconsistent with our Values
- Responding in a timely manner to the legitimate concerns and questions about our Values and the behaviours they promote, and any possible breach of our Code of Conduct or Ethics Policy.

UA recognises that it is not possible to predict every ethical challenge in which its Representatives may find themselves. Of paramount importance is the simple principle that:

No individual should use his or her position in UA for personal gain or to benefit another at the expense of UA, its vision, its reputation, or the children and communities which it serves, nor should any individual act in a way that could be reasonably seen by others as compromising the independence and integrity of UA.

5. CONFLICTS OF INTEREST

A Conflict of Interest (COI) is defined as any action or situation involving a Representative that may result in the representative’s personal gain or gain to friends, family or associates, taking precedence over their obligations to UA. Personal gain may or may not be financial.

Where conflicts of interest arise – actual, potential, or perceived – the duty of loyalty must not be compromised. UA requires all Representatives to be impartial, ensuring that they:

- Declare and make known any relevant personal interests in the manner outlined below,
- Not give or receive any inducements, gifts, benefits or the like which could, or could reasonably be seen to be in conflict with the interests of UA;
- Not provide any services that could or could be seen to be in conflict with the interests of UA;
- Not accept any hospitality or other form of gift or reward from a third party which could be seen as an inducement with the exception of token gifts (less than \$0 value);
- Declare an interest if participating in any discussion, voting or decisions relating to a business with which the employee is affiliated
- Declare an interest if participating in the selection process for a new employee where the candidate is personally known unless unavoidable and in this case an additional impartial interviewer is required to be present

6. RESPONSIBILITIES

The Director of People and Technology of UA will have responsibility for compliance and oversight of this policy and the Register of Interests and will report to the Board of Directors as deemed necessary, on an annual basis.

7. IMPLEMENTATION

All senior executives of UA must promptly advise in writing to the Chair or the Director of People and Technology as appropriate any:

- Actual, potential or perceived conflict between their own and UA's interests;
- Actual, potential or perceived pecuniary interests of theirs or of any member of their family or close associates, which may, or may be perceived to be, in conflict with the interests of UA; and
- Actual, potential, or perceived conflicts between the interests of UA and those of any relevant private entity.

UA will maintain a Register of Interests for all senior executive staff.