



**SIGHT
FOR ALL**
A SHARED
VISION

Conflict of Interest Policy

1. Scope

All Board Directors and employees of Sight For All have a responsibility to work in the best interests of the organisation and avoid situations and actions that may be, or create the appearance of being, in conflict with the organisation's overall interests, objectives and principles.

This policy applies to Sight For All Board Directors and employees.

2. Potential causes of conflict

Activities that have the potential to cause a conflict of interest include, but are not limited to:

- holding a substantial financial interest in any organisation (e.g. suppliers, customers) that has dealings with Sight For All;
- the acceptance by an employee from any party or supplier of goods and/or services, either directly or indirectly, of cash payments, goods, services, loans (except from banks or other financial institutions), or discounts that are not generally available to all employees;
- the acceptance by an employee, either directly or indirectly, of any gifts, gratuities or services in kind from any party that is involved, or is attempting to be involved with Sight For All;
- the ownership by an employee or a member of an employee's family, in any proportion, of land and/or other assets, either directly or indirectly, that is the subject, or potential subject, of business dealings with Sight For All;
- engaging in nepotism, by the offer of employment to a member of an employee's family, especially where the family members would be involved in a direct reporting relationship;
- a personal relationship with another employee, including familial, sexual or financial, where there is a potential for, or a perception that, a conflict of

- interest could exist where there is a possibility that a decision may be biased in favour of or against, a person with whom there is a personal relationship;
- engaging in outside employment (including self-employment or carrying on a business) where such employment will, or has the potential to:
 - impact on the employee's ability to perform their normal functions;
 - create a conflict of interest; and/or
 - compromise the confidentiality of the organisation;
 - all dealings between employees of Sight For All and members of their families.

Problems arising out of these situations can usually be avoided by Board Directors and employees conducting any business on behalf of Sight For All in an ethical, honest and transparent manner.

3. Gifts and Prizes

Any gifts, prizes, or rewards (including goods and/or services) that are received by an employee (or their associate) as a reward for performing their normal duties must be declared, even if they have been received with the full knowledge and permission of Sight For All, as Fringe Benefits Tax (FBT) will most likely apply to the value of the reward received and be payable by Sight For All.

In addition, most gifts, rewards and the like are classified by the tax legislation as reportable fringe benefit amounts. Any amount that is classified as a reportable fringe benefit amount will normally be required to be shown on the payment summary of the employee receiving the benefit, subjecting them to personal taxation issues. Some fringe benefits are classified as excluded benefits and are not required to be shown on an employee's payment summary.

4. When a Conflict of Interest Situation Exists

When a Board Director or employee is in a situation where a conflict of interest exists, or has the potential to exist, or could be seen to exist, they must immediately declare such interest and the potential conflict that may arise.

Where a Board Director or employee is not sure if a conflict or potential conflict exists, they should raise the matter with the Chairman of the Board or the Executive Officer and do all things necessary to ensure that such conflict or potential conflict is brought to the attention of and dealt with by Sight For All, prior to any involvement by the employee in the situation where the conflict had the potential to arise.

5. Ethical Behaviour

When conducting business on behalf of Sight For All the following guidelines will assist in determining what is considered proper and ethical behaviour:

- payment for a meal or refreshments in connection with a business meeting, as long as it is kept on a reciprocal basis and is relevant to the business at hand;
- receipt of advertising novelties, provided that they do not appreciate in value and are widely distributed to others under essentially the same business

- relationship with the donating party (e.g. giveaways such as pens, mouse pads, trinkets);
- other organisation's products made available under customer or public relations programs, such as product samples;
- relationships with commercial clients where reciprocal gifts or dealings are exchanged without any inference of non-transparent or unethical conduct.

At all times, the overriding concept and principle must be the Board Director or employee's duty to disclose all possible conflicts, or potential conflicts, as soon as they become aware of them, when conducting business or dealings on behalf of Sight For All. This is the only way that transparency, honesty and integrity can be maintained.

6. Declaration of a Conflict of Interest

Sight For All Board Directors are provided with an opportunity to declare a conflict of interest at all Sight For All Board Meetings. Declarations are recorded on the Conflict of Interest Register maintained by the Executive Officer. Where there is no conflict of interest to declare, this is also recorded on the register.

7. Related Documents

Sight For All Board Conflict of Interest Register

8. Review

The Sight For All Conflict of Interest Policy will be reviewed on an annual basis.

Document Acceptance and Release Notice

This document is Version No <3.0> <02/02/2016> of the <Conflict of Interest>SFA Procedure.

The SFA Procedure is a managed document. For identification of amendments, each page contains a release number and a page number. Changes will only be issued as a complete replacement document. Recipients should remove superseded versions from circulation.

This document is authorised for release once all signatures have been obtained.

PREPARED:
(for acceptance)



SFA Executive Officer

Date: 2 - 2 - 16

ACCEPTED ON
BEHALF OF THE
BOARD:
(for release)



SFA Chairman

Date: 2 - 2 - 16

Document Revision History

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1.0	16/07/2014		New Policy
2.0	3/02/2015	J.Bickmore	Addition of section 6
3.0	02/02/2016	J.Bickmore	Addition of Section 8. Review