
ETHOS BUILDING & RESTORATION

CONFLICT OF INTEREST POLICY

Approved by: Aaron Hair

Position: Director

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Signature:



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Policy brief

Every employee owes a duty of loyalty to the employer. This duty arises from the employee's employment contract. Employees must not act in a manner contrary to the interests of Ethos Building Pty Ltd. Where there is a conflict between an employee's personal interests or the interests of Ethos Building Pty Ltd, the latter must prevail.

Policy purpose

The purpose of this policy is to effectively identify, disclose and manage any actual, potential, or perceived conflicts of interest, in order to protect the integrity of Ethos Building Pty Ltd.

The relationship of the company with its employees should be based on mutual trust. As the company is committed to preserve the interests of people under its employment, it expects them to act only towards its own fundamental interests.

A conflict of interest occurs when one's personal interests' conflict with their responsibility to act in the best interests of the Ethos Building Pty Ltd. Personal interests include direct interests as well as those of family, friends, or other organisations a person may be involved with or have an interest in (for example, as a trade or supplier). A conflict of interest may be actual, potential, or perceived and may be financial or non-financial. This policy will outline the rules regarding conflict of interest and the responsibilities of employees and the company in resolving any such discrepancies.

Objective

Ethos Building Pty Ltd aims to ensure that all employees are aware of their obligations to disclose any conflicts of interest that they may have and to comply with this policy to ensure they effectively manage those conflicts of interest as representatives of Ethos Building Pty Ltd

Scope

This company conflict of interest policy applies to all prospective or current employees of the company, as well as independent contractors and persons acting on behalf of the company. For the purpose of this policy, an "employee" includes:

- permanent employees (including full time and part time);
- fixed-term employees,
- casual employees; temporary agency staff,
- and contractors, engaged by Ethos Building Pty Ltd and its subsidiaries

Definition of conflicts of interest

Conflicts of interest situations may take many different forms that include, but are not limited to:

- Employees' ability to use their position with the company to their personal advantage
- Employees engaging in activities that will bring direct or indirect profit to a competitor
- Employees using connections obtained through the company for their own private purposes
- Employees using company equipment or means to support an external business
- Employees acting in ways that may compromise the company's legality (e.g. taking bribes or bribing representatives)

Personal interest in third parties

A conflict may arise where an employee has a personal interest in a third party which has a business relationship with Ethos Building Pty Ltd. For example, an organisation that:

- (a) conducts business with, or seeks business from, Ethos Building Pty Ltd,
- (b) Ethos Building Pty Ltd seeks business from: or
- (c) competes with Ethos Building Pty Ltd
- (d) An employee has a personal interest in a third party

Positions outside of Ethos Building Pty Ltd

In some cases, a conflict will arise where an employee has another paid or unpaid position outside of Ethos Building Pty Ltd. This does not necessarily mean that such outside positions are prohibited, however employees must notify Ethos Building Pty Ltd of any such position before it is accepted, so that an assessment can be made of whether a conflict exists and, if so, how to manage it.

Employee and contractor referrals

An employee who introduces an associate to Ethos Building Pty Ltd as a potential employee must not be involved in the selection process. Ethos Building Pty Ltd should be informed of the situation, so that an assessment can be made of whether a conflict exists and, if so, how to manage it.

Procurement and business dealings

An employee who uses the employee's position at Ethos Building Pty Ltd to do business with a third party with which the employee, or the employee's associate, has an interest, may have a conflict. Ethos Building Pty Ltd should be informed of this, so that an assessment can be made of whether a conflict exists and, if so, how to manage it.

Accepting gifts and benefits

An employee who receives more than a token gift or benefit (including meals, hospitality, accommodation, or travel, among other things) from a third party in connection with the employee's duties for Ethos Building Pty Ltd may have a conflict. Ethos Building Pty Ltd should be informed, so that an assessment can be made of whether a conflict exists and, if so, how to manage it.

Roles and responsibilities

Considering and avoiding conflicts of interest

- (a) Each employee is responsible for ensuring that, in all of the employee's activities, the employee considers whether an actual or potential conflict of interest arises.
- (b) Employees must take all reasonable measures to avoid conflict of interest situations arising

Identification and disclosure of conflicts of interest

Once an actual, potential, or perceived conflict of interest is identified, the employee must immediately disclose the conflict to Ethos Building Pty Ltd by:

- (a) emailing the details of the conflict to Joe Di Natale (COO) joe.dinatale@ethosbuilding.com.au),
and
- (b) copying the employee's manager on the email.

Where there is any doubt as to whether a conflict may exist, employees should seek guidance from their managers and, if necessary, approval from (COO) Ethos Building Pty Ltd, before engaging in the activity that may constitute a conflict of interest.

Managers and Supervisors must also keep an eye on actual, potential, or perceived conflict of interest of their subordinates.

Reporting changes in conflicts of interest

Where a conflict of interest situation changes, an employee must immediately disclose the change by way of emailing the details of the conflict to Joe Di Natale (COO) joe.dinatale@ethosbuilding.com.au and copying the employee's manager on the email.

How will conflict of interest situations be handled?

Conflict of interest situations will be dealt with by Ethos Building Pty Ltd on a case-by-case basis.

What should be considered when deciding what action to take in deciding what approach to take, Ethos Building Pty Ltd will consider:

- (a) whether the conflict needs to be avoided or simply documented
- (b) whether the conflict will realistically impair the disclosing person's capacity to impartially participate in decision-making
- (c) alternative options to avoid the conflict
- (d) the possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of Ethos Building Pty Ltd.

Ethos Building Pty Ltd, COO (joe.dinatale@ethosbuilding.com.au) will maintain a confidential register of potential conflicts of interest that have been disclosed for review.



In many cases, Ethos Building Pty Ltd may not require anything to be done after the interest is disclosed. However, in some cases Ethos Building Pty Ltd may find it necessary to direct the employee to take actions that may include undertaking alternative duties disposing of the interest, or both.

Compliance with this policy

Failure to comply with the obligation to disclose actual or potential conflicts of interest may lead to disciplinary action being taken by Ethos Building Pty Ltd, including warnings, termination of employment, or both.

Further information

If you require additional information in relation to this policy, or you have any suggestions for improvement to this policy, please contact Joe Di Natale (joedinatale@ethosbuilding.com.au).