

This policy and related procedures are applicable to the CHL group of companies (CHL) in Australia, including: Community Housing Ltd, Community Housing (Vic) Ltd, Community Housing Investment (VIC) Ltd, Community Housing (Tas) Ltd, Community Housing (Qld) Ltd, Community Housing (WA) Ltd, Community Housing Investment (WA) Ltd, Community Housing (SA) Ltd, Horizon Housing Realty Ltd, Australian Affordable Housing Securities Ltd, Community Housing Investment (QLD) Ltd, Community Housing Investment (NSW) Ltd, Community Housing (NT) Ltd, Community Housing (Subi East) Ltd, Community Housing (Homes For Regions) Ltd, Building Communities Housing Ltd and any other entities within CHL which adopt this policy.

## Purpose and scope

This policy defines Community Housing Limited's (CHL) commitment to ensuring that conflicts of interest are identified and managed so that they do not affect the services, activities or decisions of the organisation. This approach supports corporate sustainability and good governance.

This policy applies to all CHL employees, contractors, consultants, temporary staff, volunteers and any other persons acting on behalf of CHL. For the purposes of this policy, these persons are collectively referred to as *Covered Persons* unless otherwise stated.

## Definitions

**Conflict of Interest:** A Covered Person who has personal interests which conflict with their responsibility, as a worker of CHL, to perform their duties and lead to any form of financial or personal gain. Conflicts of Interest can be actual, potential or perceived.

A conflict of interest exists where a personal interest could improperly influence, or be perceived to influence, the performance of a person's duties. A perceived conflict must be disclosed and managed in the same manner as an actual conflict.

Types of conflicts of interest:

- **Actual Conflict of Interest:** Occurs when a Covered Person's personal interests directly interfere with their ability to perform their duties objectively and in the best interests of CHL.
- **Potential Conflict of Interest:** Occurs when a personal interest could interfere with a Covered Person's duties in the future, even if no improper influence has yet occurred.
- **Perceived Conflict of Interest:** Occurs when it may appear to others that a Covered Person's personal interests could improperly influence their performance of duties, regardless of whether any actual conflict exists.

**Responsible Officer:** For the purpose of this policy a Responsible Officer includes the Chief Governance Officer or delegate, Chief Financial Officer and Chief People Officer.

For further definitions, please refer to the [Definitions Register](#).

## Policy statements

1. Covered Persons must act in the best interests of CHL, avoiding any personal or outside interests that could influence decisions wherever practical. Decisions must always prioritise CHL's interests over personal gain and support ethical, sustainable and well-governed operations.
2. Covered Persons must avoid any actual, potential or perceived conflict of interest wherever possible. Where a conflict cannot reasonably be avoided, it must be promptly disclosed so it can be managed in accordance with this policy.
3. Relationships, internal processes or secondary employment must not compromise or appear to compromise obligations to CHL.
4. CHL resources, information and opportunities are to be used solely for CHL purposes.
5. Conflicts may arise in:
  - 5.1. recruitment, promotion or disciplinary decisions
  - 5.2. contractor, supplier or tenant selection

- 5.3. financial approvals or expenditure authorisation
- 5.4. secondary employment or outside professional activities
- 5.5. personal relationships affecting professional judgment.
6. Conflicts of interest may also arise through the acceptance of gifts, benefits or hospitality and must be declared and managed in accordance with the *Gifts and Benefits Policy*.
7. Covered Persons who are uncertain whether they are placed in a perceived, potential or actual conflict of interest situation should seek advice from their manager, supervisor or a Responsible Officer.
8. Conflicts of interest must be disclosed:
  - 8.1. on commencement of employment or engagement
  - 8.2. as soon as a conflict arises or circumstances change
  - 8.3. before participating in any decision or activity to which the conflict relates.
9. Conflicts of interest must be reported to a manager or Responsible Officer as per the *Conflict of Interest Procedure*.
10. Covered Persons must follow the approved Risk Management Plan as per the *Conflict of Interest Declaration Form* to manage or remove the conflict of interest.
11. Where a conflict of interest is identified, the Covered Person must remove themselves from, and must not influence, any decision-making, procurement, recruitment, financial approval, or other activity affected by the conflict, unless otherwise approved in writing by a Responsible Officer.
12. All declared conflicts of interest will be recorded in a central Conflict of Interest Register maintained by CHL and reviewed periodically for compliance and assurance purposes.
13. Information arising from conflict declarations will be handled in accordance with the *Privacy Policy*.
14. Failure to disclose, avoid or appropriately manage a conflict may constitute misconduct or serious misconduct and result in disciplinary action being taken in accordance with the *Employee Disciplinary Policy*.
15. Where a Covered Person feels a conflict of interest has not been reported, they may raise the matter with their manager a Responsible Officer.
16. Managers and Responsible Officers are accountable for ensuring declared conflicts are reviewed and managed in line with this policy and the *Conflicts of Interest Procedure*.
17. Managers and Responsible Officers who fail to appropriately review, manage, or act on declared conflicts of interest may themselves be subject to disciplinary action.

## Accountability

Chief Governance Officer – accountable for authorising submission to the Executive Team for final policy endorsement by the Chief Executive Officer.

Risk Manager – responsible for reviewing and maintaining the policy, overseeing its effective implementation and providing advice.

All Employees – responsible for complying with the policy, actively supporting its implementation, and contributing to the achievement of its objectives. Failure to adhere to this policy may result in disciplinary action, up to and including termination of employment.

## Related documents

- [Code of Conduct Policy](#)
- [Employee Disciplinary Policy](#)
- [Fraud, Corruption, and Criminal Conduct Policy](#)

- [Gifts and Benefits Policy](#)
- [Hospitality, Functions and Entertainment Policy](#)
- [Performance Counselling Policy](#)
- [Procurement Policy](#)
- [Whistleblower Policy](#)
- [Conflict of Interest Declaration Procedure](#)

## Legislation

- Australian Charities and Not-for-profits Commission Act 2012

## Approved by

Approved by **Danny Dracic, Chief Executive Officer** on **29/01/2026**.