

Document Number: POL-0005

Issue Date: 11 August 2003

Review Date: 10 August 2003

Revision No: 1

NECA GROUP TRAINING

Page 1 of 2

CONFLICT OF INTEREST POLICY

POLICY OVERVIEW & OBJECTIVES

NECA Group Training's Conflict of Interest Policy provides a framework for all NECA Group Training's staff, management and Board Members to undertake their responsibilities in such a way as to meet their legal and moral obligations to protect and further the interests of NECA Group Training. This policy clarifies conflict of interest, principals and process for the Board, employees and staff.

DEFINITION OF CONFLICT OF INTEREST

For the purposes of this policy, a conflict of interest is "Any situation where a NECA Group Training stakeholder may be in a (or may potentially be in) a position of being involved in a decision or action where they may not be perceived to be able to put NECA Group Training's interest first and foremost".

PRINCIPALS

Except as noted in "Notifying a Real, Perceived or Potential Conflict of Interest" below, no person may be involved in any decision or action where;

- Their involvement is contrary to statute or NECA Group Training's policies and procedures
- They, or any relative, partner or friend, or any organisation in which they have equity or of which they are an employee or board member, may benefit financially or in any other material way from the outcome of the decision
- The information provided to them in the process of formulating the decision is likely to be communicated to any party or in any way which harms NECA Group Training's interests or which breaches NECA Group Training's Privacy Policy.

NOTIFYING A REAL, PERCEIVED OR POTENTIAL CONFLICT OF INTEREST

Any person who believes they may have a conflict of interest should report the details immediately. The details should be reported to "the person responsible", being:

For the Chairperson; to the Secretary of the Board and Board
For any other Board Member/s; to the Group Scheme Manager and Secretary of the Board
For the Group Scheme Manager; to the Board
For any staff members; to the Group Scheme Manager

All conflict of interest occurrences will be minuted at in the Minutes of NECA Group Training Board Meeting.

Document Number: POL-0005

Issue Date: 11 August 2003

Review Date: 10 August 2003

Revision No: 1

NECA GROUP TRAINING

Page 2 of 2

ASSESSING AND RESOLVING CONFLICTS OF INTEREST MATTERS

The person with a conflict of interest may only continue to be involved in a decision or action where the person responsible is reasonably satisfied that the conflict of interest is not likely to harm the interests of NECA Group Training.

If the responsible person decides that the person with the conflict of interest is able to discharge their duties and responsibilities to the maximum benefit of NECA Group Training despite the conflict of interest they may have continued involvement in a decision or action.

All conflict of interest occurrences will be minuted at in the Minutes of NECA Group Training Board Meeting.

SCOPE

The principals outlined in this policy apply to all of NECA Group Training's activities, included but not limited to:

- Board decisions
- Management Meetings
- Recruitment and selection of apprentices and staff
- Remuneration and termination of staff or apprentices
- Purchasing from Suppliers
- Quotations to Host Trainers
- Placement of apprentices

OTHER POLICIES

The Conflict of Interest Policy exists within the framework of legal obligations and related NECA Group Training policies and procedures, such as the Code of Ethics Policy and the Privacy Policy Statement.

RESPONSIBILITY OF IMPLEMENTATION OF THIS POLICY

Except where noted otherwise, the Group Scheme Manager of NECA Group Training is responsible for the implementation of this policy.

REVIEW

This policy is to be reviewed annually.