

Conflicts of Interest Policy



Last Updated: 8 June 2026



Registered Charity



Vanni Hope (ABN: 19614675231) is a charity registered with the ACNC.

Introduction

Vanni Hope is committed to achieving fair, well-informed decision-making that is not influenced by a conflict of interest on the part of any director, project manager/coordinator, volunteer or member of Vanni Hope (**Representatives**) in relation to any of the activities undertaken by Vanni Hope. Vanni Hope is committed to maintaining a policy that avoids ethical, legal, financial or other conflicts of interest and that any such conflicts (should they arise) do not conflict with obligations with respect to Vanni Hope.

Definition of Conflict of Interest

A conflict of interest with respect to Vanni Hope occurs when a Representative has a personal interest which may result in a conflict between the individual's self-interest and the interests of Vanni Hope as an organisation. Such a conflict can lead to the risk that the person will make a decision based on, or affected by, their personal interests, rather than in the best interests of Vanni Hope.

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. It also includes a conflict between a Representative's duty to Vanni Hope and another duty that the Representative has.

- A conflict of interest may be actual, potential or perceived and may be financial or non-financial.
- Actual conflict of interest is where an individual is in a situation where their official duties can be influenced by their personal interests.
- Perceived conflict of interest is where an individual is in a situation where their official duties can appear to be influenced by their personal interests.
- Potential conflict of interest is where an individual is in a situation where their official duties may be influenced in the future by their personal interests.

Scope of Policy

This Conflicts of Interest Policy (the **Policy**) applies to all Representatives of Vanni Hope involved in project, partnership, or organisational decision-making roles. The Policy also extends to those who partner with Vanni Hope, and they must disclose any actual or perceived material conflicts of interests as required.

Where Vanni Hope enters into a Memorandum of Understanding (MOU) or partnership agreement with an implementing partner, Vanni Hope will ensure that the MOU or agreement includes an obligation on the partner to: (a) maintain an equivalent conflicts of interest policy or procedure; (b) disclose to Vanni Hope any actual, potential or perceived conflict of interest that may affect

the delivery of the funded activity; and (c) take steps to manage any such conflict in a manner consistent with this Policy. Failure to comply with this obligation may be grounds for review or termination of the partnership.

Purpose

The purpose of this policy is:

- to help the members to recognise when they have a conflict of interest which should be disclosed to the board of directors of Vanni Hope;
- to help the board of directors of Vanni Hope to identify and manage any potential or actual conflict of interest in order to protect the integrity and confidence in Vanni Hope; and
- manage any risks that might be associated with such conflict of interest.

Procedures for managing conflicts of interest

Conflicts of interest with respect to members of Vanni Hope

All members are required to:

- avoid conflicts of interest where possible; and
- identify and disclose to the board of directors of Vanni Hope any conflicts of interest that come to exist.

The board of directors of Vanni Hope must:

- carefully manage any conflicts of interest;
- adhere to this Policy;
- monitor compliance with this Policy; and
- respond to any breaches of this Policy and take steps to ensure that the best decision was made with respect to Vanni Hope.

At each board of directors meeting, participants will be asked to disclose if they have any conflict of interest with respect to any actions which are being considered or voted on. For the avoidance of doubt, with the exception of any previously agreed and disclosed remuneration, members and staff of Vanni Hope may not make a financial gain as a result of working with Vanni Hope. Vanni Hope must not grant favourable treatment to contractors, suppliers or government officials with respect to any prospective or actual projects or actions undertaken by the organisation.

Once an actual, potential, or perceived conflict of interest is identified, it will be entered into a register of interests, as well as being raised with the board of directors of Vanni Hope. The Register of Interests will be maintained by the Board Secretary or a nominated director of Vanni Hope. Each entry in the Register of Interests must record: (a) the name and role of the disclosing Representative; (b) the nature and extent of the conflict; (c) the date of disclosure; (d) the Board's decision on how the conflict was managed; and (e) any steps taken to address it.

Conflicts of Interest with respect to the Board of Directors

If a conflict of interest relates to a member of the board of directors, once such conflict of interest has been appropriately disclosed by the relevant director, the board of directors (excluding the relevant member of the board of directors and any other conflicted member) must decide whether the conflicted member(s) should be eligible to:

- vote on the conflicted matter;
- participate in any discussion related to the conflicted matter; or
- be present during the discussion with respect to the conflicted matter.

In deciding what approach to take, the board of directors will consider:

- whether the conflict will materially impair the disclosing person's capacity to impartially participate in decision-making or voting with respect to the conflicted matter; and
- if the disclosing person is permitted to participate in discussion or vote on the relevant conflicted matter, whether it would create an appearance of improper conduct by Vanni Hope that may undermine the reputation of Vanni Hope.

The approval of any action requires at least a majority of the board of directors (excluding any conflicted board member(s)) who are present and voting at the meeting. The action and result of the vote will be recorded in the minutes of the meeting and in the conflict of interests register.

Conflicts of Interest with respect to the Managing Director

Where a conflict of interest relates to the Managing Director of Vanni Hope, the Managing Director must immediately disclose the conflict to the Board Chair. The Board Chair will convene the remaining members of the board of directors (excluding the Managing Director and any other conflicted member) to determine how the conflict should be managed in accordance with the procedures set out above. The disclosure and the Board's decision will be recorded in the Register of Interests and in the minutes of the relevant meeting.

If the Board Chair is also conflicted in the same matter, the remaining non-conflicted directors will elect a temporary Chair from among themselves to manage the process.

Compliance

If the board of directors has a reason to believe that a person has failed to comply with it, it will investigate the circumstances. If it is found that this person has failed to disclose a conflict of interest, the Board may take action against them. This may include seeking to terminate their relationship with Vanni Hope. If a person suspects that a member has failed to disclose a conflict of interest, they must notify the board of directors.



Review

This Policy will be reviewed once every two years to ensure that the policy is operating effectively.

Date	Version	Review Description	Reviewed by	Approved by
Feb 2025	1	New template created	Virosh Poologasundaram	Board of Directors
June 2026	2	Complete reformat and general update of policy	Abinaja Yogarajah	Board of Directors