



Conflict of Interest Policy

HKRP is committed to provide a framework for resolving situations where conflicts of interest exist or might be perceived to exist.

Purpose

The purpose of this Policy is to define the circumstances where a conflict of interest may occur and what HKRP requires of its workers in those circumstances.

Application

This Conflict-of-Interest policy applies to all employees and contractors engaged in work for HKRP.

All employees and contractors must observe high standards of ethical behaviour and avoid any activity or interest which might reflect unfavourably upon the integrity and values of HKRP. Employees and contractors have an obligation to avoid unacceptable ethical, legal, financial, or other conflicts of interest and to ensure their activities and interests do not conflict with their obligations to HKRP.

Responsibilities

It is the responsibility of employees and contractors to identify any conflicts of interest and to take action to address situations in which a conflict of interest could arise, or perceivably arise, as soon as the conflict of interest is identified, by implementing the conflict-of-interest procedure.

HKRP is responsible for communicating the requirements of this Policy to employees and contractors on a regular basis.

Consequences of a breach of the policy

Failure of an employee to disclose a potential or actual conflict of interest may result in disciplinary action. Depending on the nature and impact of the conflict of interest situation, other action may be instigated, including legal action.

Areas in which conflict of interest may arise:

Without limiting the circumstances, the following are examples of areas which can give rise to situations where a conflict of interest may occur:

- Decisions regarding suppliers, customers, and other persons in respect of the selection and/or on-going dealings related to doing or seeking to do business with HKRP;
- Business or close personal relationships with competitors or businesses operating in the same area as HKRP;
- Decisions regarding appointment, promotion or other employment decisions relating to employees;

- Decisions and dealings with potential employees or contractors;
- Holding directorships, executive positions, shareholdings or ownership of other companies, organisations, or businesses;
- Acceptance of hospitality or other forms of compensation that could be construed as being for the purpose of facilitating an outcome;
- Use of HKRP's facilities and equipment for personal benefit or the benefit of a third party;
- Employee acting as a supplier or customer, or a direct family member acting as a supplier or customer.

Actions to take when a conflict of interest is identified:

Where a conflict of interest has been identified by an employee, HKRP expects the person to notify their manager of the conflict and for the conflict to be recorded in the appropriate risk register.

If possible, steps should be taken to eliminate or mitigate the conflict, thereby minimising the risk to the organisation and any other parties.



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