

**HR05**

# Employees Conflict of Interest Policy

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<b>Date this version approved:</b>	01/07/2020
<b>Date first created:</b>	27/05/2020
<b>Approval:</b>	CEO
<b>Version control:</b>	V0.3
<b>Review date:</b>	01/07/2023

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# Introduction

## **Purpose**

This policy has been developed to provide a framework for all ACL Metal Powders employees and contractors in declaring conflicts of interest. This policy details, on how employees and contractors conflict of interests are managed.

## **Scope**

This policy is relevant to all staff, contractors and visitors of ACL Metal Powders.

## **Responsibilities**

### **Employees and Management responsibilities**

- assessing their private and personal interests and whether they conflict, or have the potential to conflict, with their official duties
- take reasonable steps to restrict the extent to which a private interest could compromise, or be seen to compromise, their ability to carry out their duties
- disclose conflicts of interest they may have to the relevant manager.

# General Statement

## General Statement

ACL Metal Powders is committed to the transparent disclosure, management and monitoring of existing and potential conflicts of interest. All managers and employees have a duty to avoid actual or perceived conflicts of interest.

Managers and employees must avoid being placed in a situation where they must make a decision in relation to the business of ACL Metal Powders that might be adversely affected by another business or personal interest.

Avoiding actual, potential and perceived conflicts of interest is fundamental to ensuring the highest levels of integrity and trust for all ACL Metal Powders' operations.

Conflicts of interest can be actual, potential or perceived.

- An **actual conflict of interest** is one where there is a real conflict between an employee's duties and responsibilities and their private interests.
- A **potential conflict of interest** arises when an employee has private interests that could conflict with their duties.
- A **perceived conflict of interest** exists when a third party could form the view that an employee's private interest could improperly influence the performance of their duties, now or in the future.

Any such disclosures to management shall be held confidentially and may not be taken into account in any employment context other than the avoidance of conflicts of interest.

# Implementation

## **Breach of this Policy**

Failure to comply with the principles of this policy, or of the supporting procedures and forms, could result in appropriate disciplinary actions, suspension, termination of employment (dismissal) or termination of contracts and agreements. Additionally, individuals may be subject to loss of Company access, privileges, civil, and/or criminal prosecution.

## **Policy Review**

This policy will be reviewed annually or as required to reflect changes in business practice or legislation.

## **Dissemination of Policy**

A copy of this policy will be made available to each worker upon commencement of work and additional copies made available upon request.

## **Authority and Responsibility**

This policy is issued under the authority of the Chief Executive Officer of ACL Metal Powders .

## **Supporting Documents**

- a) ACL Metal Powders Senior Management Conflict of Interest Policy

A handwritten signature in black ink, appearing to read 'Doug Rowe', with a date '21-7-2023' written below it.

**Doug Rowe**  
**Chief Executive Officer**  
**Date: 21st July 2023**



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