YARRAWONGA MULWALA GOLF CLUB RESORT

Name of Policy: Conflict of Interest

STATEMENT: Yarrawonga Mulwala Golf Club Resort is committed to achieving and

maintaining a productive and harmonious working environment where

concerns are managed promptly, impartially and justly.

DEFINITION: "Conflict of Interest" is defined when the personal interests of Board Directors, Senior Management and employees of the Club, conflicts with a person's responsibility to act in the best interest of the Club resulting in poor business decisions and potential damage to reputation of YMGCR? Person's interest include any organisation or business a persons may be involved in, be employed by or have an interest in.

POLICY:

It is the policy of YMGCR that ethical, legal, financial or other conflicts of interest be avoided wherever possible and that such interest do not conflict with any person's obligation to the Club. This Policy has been developed because conflicts of interest commonly occur and do not need to present a problem for the Club if they are effectively managed with transparency.

The Board of Directors will monitor compliance with this Policy.

PROCEDURE

- The compliance officer shall manage conflicts of interest by requiring involved parties to –
 - (a) Avoid conflicts of interest where possible;
 - (b) Identify and disclose any actual or perceived conflicts of interest;
 - (c) Carefully manage any actual or perceived conflicts of interest;
 - (d) Adhere to this policy and respond to any actual or perceived breaches in writing;
- Once an actual, potential or perceived conflict of interest is identified and information
 has been disclosed by the applicable person, it must be entered into the YMGCR's
 Register of Interest as well as being tabled at the next Board meeting;
- The Register of Interests must be maintained by the Compliance Officer and must record comprehensive information related to a conflict of interest;
- The Register of Interests must include the nature and extent of the conflict of interest and any steps taken to address it;

- In the event of ongoing approved conflict of interest, the Board need not receive monthly updates;
- Parties declaring a conflict of interest have the right to confidentiality. Information disclosed will be restricted to the Compliance Officer, Operations Manager, CEO and the Board;
- If there is a reason to believe that a person subject to this Policy has deliberately failed to comply with the requirements, serious disciplinary action will need to be considered.

RELATED LEGISLATION;

RELATED DOCUMENTS:

Conflict of Interest Disclosure document & affirmation of compliance.

Register of Interests

RELATED POLICIES:

Discipline Policy

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Document 1	2		
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1