



Conflict of Interest Policy

1. Purpose

This Conflict of Interest Policy is designed to help Contact ensure that all of its employees including contingent workers such as secondees, contractors and consultants of Contact (collectively “employee/s”) avoid any actual, apparent or potential conflicts of interest.

A conflict of interest is any situation an employee has a private interest that competes, or appears to compete, with Contact’s interests. These competing interests can be financial, non-financial, actual or perceived.

This policy should be read in conjunction with the Conflicts of Interest Management Procedure, which provides further guidance as to how employees should manage a conflict of interest.

2. Key Principles

- Whenever possible, we avoid conflicts of interest.
 - Where it is not possible to avoid a conflict of interest, we tell someone about it as soon as we become aware of it. This applies equally to actual conflicts of interest, to situations that may reasonably give the *appearance* of a conflict of interest to an outside observer, and to situations that have the potential to develop into a conflict of interest.
 - Employees should make any disclosure to their manager.
 - Where a conflict of interest has been disclosed, it must be recorded in the employee Conflict of Interests Register.
 - Where a conflict of interest exists, we take appropriate steps to manage that situation. Generally, that means the person with the conflict of interest will not participate in decisions related to the matter that they are interested in. We follow the Conflict of Interest Management Procedure set out in the Appendix to this policy.
 - We are guided by our Tikanga, and use concepts of integrity, honesty, transparency, and good faith when making decisions on the identification, disclosure, recording and management of conflicts of interest.
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3. Accountabilities

All employees are responsible for ensuring their own compliance with this Policy and the Conflicts of Interest Management Procedure. That means all employees are responsible for identifying and disclosing any actual, apparent, or potential conflict of interest.

The manager of any employee who discloses a conflict of interest is responsible for ensuring that a Conflict of Interest Management Plan is completed, approved, and sent to the General Counsel.

Any employee that is aware of any breach of this Policy is encouraged to take action in accordance with Contact's *Protected Disclosures (Whistleblowing) Policy*. Any known or suspected instances of non-compliance can also be reported to the General Counsel for full investigation and appropriate disciplinary action.

4. Document control

Approved: March 2019

Document owner: General Counsel