



CONFLICT OF INTEREST POLICY

Policy Category	Date Approved	Review Schedule	Next Review
Governance / Stewardship	20 July 2026	Two Years	20 July 2028

1. Purpose

The Steve Farrelly Foundation (Foundation) is committed to acting with integrity, transparency, fairness, and accountability in all its activities. The purpose of this policy is to:

- Protect the reputation and charitable purpose of the Foundation.
- Ensure decisions are made in the best interests of the Foundation and its beneficiaries.
- Identify, disclose, manage, and record actual, potential, and perceived conflicts of interest.
- Comply with applicable New Zealand laws and good governance practices.

2. Policy Statement

All persons covered by this policy must avoid situations where personal interests, financial interests, family relationships, professional obligations, or other loyalties may conflict, or appear to conflict, with the interests of the Foundation.

The Foundation recognises that conflicts of interest are not necessarily improper. However, conflicts must be disclosed promptly and managed appropriately.

3. Conflict of Interest Definition

A conflict of interest (Conflict) exists when an individual's personal, financial, professional, family, or other interests could improperly influence, or be perceived to influence, their decisions or actions on behalf of the Foundation. A conflict may be actual, potential or perceived and may include, but are not limited to:

- Receiving gifts, benefits, commissions, discounts, or goods connected to Foundation activities.
- Personal financial gain resulting from Foundation activities
- Decisions in favour of family members, partners, close friends including employment
- Trustees serving on boards of organisations that may receive grants, sponsorship, support, or services from the Foundation.

4. Duty to Disclose

All Trustees and Contractor acting for the Foundation must:

- Disclose any actual, potential, or perceived conflict as soon as they become aware of it and update as may be required.
- Complete any conflict declarations requested by the Foundation on appointment and thereafter annually unless a new conflict arises.

6. Register of Interests

The Foundation through the Chair will maintain a Register of Interests to record any disclosed conflicts and the actions taken to manage the conflict.

7. Management of Conflicts

Where a conflict is disclosed, the Board will determine how the conflict should be managed.

Management options may include:

- **Recording the Conflict:** Where the conflict is minor and unlikely to affect decision-making.
- **Restricting Participation:** The individual may participate in discussions but not vote or influence decisions.
- **Withdrawal:** The individual may be required to leave meetings during discussions and decisions.
- **Independent Assessment:** The matter may be referred to an independent person or committee.
- **Exclusion from Decision-Making:** The individual may have no involvement in the relevant matter.
- **Termination or Resignation:** In serious circumstances where the conflict cannot be appropriately managed.

11. Gifts, Benefits and Hospitality

Trustees, Volunteers, and Contractors must not accept gifts, hospitality, discounts, favours, or benefits that:

- Could influence decision-making;
- Could be perceived as influencing decision-making; or
- Create an obligation to another party.

Any gift or hospitality exceeding a reasonable value of **NZ\$100** should be disclosed to the Chair and recorded where appropriate.

13. Breaches of Policy

Breaches of this policy may result in removal from a decision-making process, withdrawal of delegated authority, or other actions considered appropriate by the Board.

14. Policy Review

This policy will be reviewed at least every two years, or sooner if required by changes in legislation, governance requirements, or Foundation operations.

Signed:



Date: 21 July 2026

Conflict of Interest

Conflict of Interest Declaration

Name: _____

I confirm that I have read the Conflict of Interest Policy and declare that:

☐ I have no actual, potential, or perceived conflicts of interest to disclose.

OR

☐ I disclose the following actual, potential, or perceived conflicts of interest:

I undertake to notify the Steve Farrelly Foundation promptly if any new conflict arises or an existing conflict changes.

Signature: _____

Date: _____