

Handling Conflicts of Interest Policy

17 June 2025

Issued for: Landcom

Issue date: 17 June 2025

Distribution only: External Use

Issued and authorised by: Chief Executive Officer

Version: 4.0

Contents

1	Purpose.....	4
2	Application.....	4
3	Defined Terms	4
4	Scope and guiding principles.....	5
4.1	Handling Conflicts of Interest - Policy in brief	5
4.2	What is a conflict of interest?.....	5
4.3	Types of conflict of interest	6
4.4	Types of financial interests.....	7
4.5	Types of non-financial interest.....	7
5	Recognising conflicts of interest	7
5.1	The conflict of interest test	8
6	Declaring conflicts of interest.....	8
6.1	Overarching Obligations.....	8
6.2	How to Declare a Conflict of Interest.....	8
7	Oversight and assurance of conflicts of interest declarations	9
8	How Landcom manages conflicts of interest?	10
8.1	Declare, declare, declare.....	10
8.2	Avoiding conflicts of interest	11
8.3	Managing declared Conflicts of Interest	11
8.4	Likely areas for conflicts of interest at Landcom.....	11
8.4.1	Land and property dealings.....	12
8.4.2	Personal dealings with suppliers and service providers	12
8.4.3	Inside information.....	12
8.4.4	Secondary/external employment and private commitments	13
8.4.5	Conflict of Duties	13
9	Roles and responsibilities	14
9.1	Board and Directors:	14
9.2	The CEO	15
9.3	ExCo and Management	15
9.4	The Head of Legal and the Legal team	15
9.5	All Staff.....	15
10	Managing personal information	16
11	Breaches.....	16

Document Control Table.....18

Annexure A Landcom’s Conflict of Interest Control Framework..... 20

1 Purpose

Handling conflicts of interest ethically, transparently and honestly is essential to upholding public trust and confidence in Landcom. It preserves Landcom's reputation for ethical and principled behaviour within the NSW Government and the broader community.

This Policy provides a framework for how Landcom manages conflicts of interest in an ethical and transparent manner. It ensures that Landcom and its Staff make decisions in a fair and unbiased way, unaffected by self-interest or personal or professional gain. It also prevents adverse consequences that can arise from conflicts of interest, including the appearance of favouritism, undue influence or impropriety while helping to ensure that decisions are made in the public interest

Conflicts of interest do not, of themselves, constitute corrupt conduct. However, corrupt conduct and unethical behaviour can arise when conflicts of interest are concealed, understated, mismanaged or abused. According to ICAC, many, if not most, instances of corrupt conduct involve a conflict of interest.

2 Application

This Policy applies to the Board, the CEO, all permanent and temporary Landcom employees and contingent workers engaged by Landcom, collectively defined as Staff for the purposes of this Policy.

It also applies to Directors as individuals having public official functions or acting in a public official capacity for or on behalf of Landcom.

3 Defined Terms

Term	Definition
ARMC	means the Audit & Risk Management Committee
Board	means the Board of Landcom, comprising the Directors of the Board
CEO	means Chief Executive Officer
Close Family Member	means spouses, de facto partners, parents, children and siblings, cousins, aunts, uncles or grandparents or other family relations of Staff
Code of Conduct	means the Staff Code of Conduct
Directors	means Directors on the Board of Landcom
EGM	means Executive General Manager
ExCo	means the Executive Committee, comprising the Executive Leadership team
Head of Legal	means the manager with the functional role of General Counsel who has responsibility for the Legal function within Landcom. The position title may change from time to time.
ICAC	means the NSW Independent Commission Against Corruption

Term	Definition
Management	has the same meaning as in the Staff Code of Conduct
People Manager	has the same meaning as in the Staff Code of Conduct
Policy	means the Handling Conflicts of Interest Policy
Staff	includes the Board, the CEO, all permanent and temporary employees and contingent workers engaged by Landcom. This term is used for the purposes of this Policy.
Suppliers	has the same meaning as in the Supplier Code of Conduct

4 Scope and guiding principles

4.1 Handling Conflicts of Interest - Policy in brief

You must:

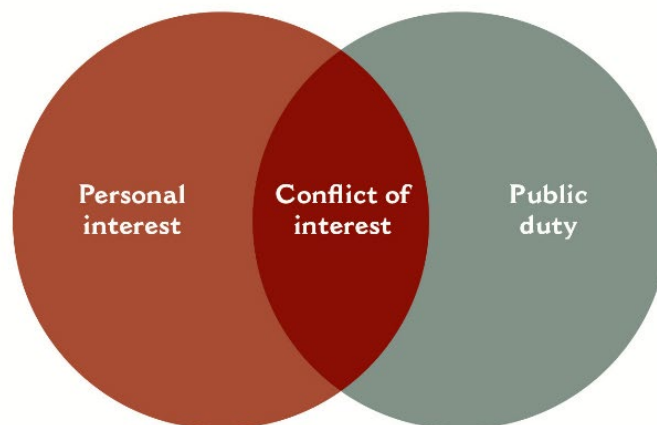
- Be alert to and declare all conflicts of interest in accordance with this Policy;
- Cooperate with your People Manager or other colleagues to ensure conflicts of interest are properly managed;
- Not allow your personal interests to affect the way you carry out your public duties; and
- Protect the reputation of Landcom by considering how a conflict of interest might be perceived.

If you have concerns about whether your personal interests could conflict with your public duties, you may seek advice from your People Manager or the Legal team.

When considering conflicts of interest, the personal interests of your Close Family Members are normally deemed to be your interests and sufficient to cause a conflict.

4.2 What is a conflict of interest?

A **conflict of interest** exists when a reasonable person might perceive that your personal interests could be favoured over your public duties. In practice, this requires a connection or overlap between those personal interests and your public duties, as shown in the figure below.



Public duty is a broad concept that extends beyond performing your day to day role at Landcom. It also means a power, authority or function conferred on you as the holder of a public office and includes a duty to always serve the public interest in an ethical manner. Our public duties include a requirement to act in accordance with the Staff Code of Conduct, Landcom's values and broader frameworks, policies and procedures, including this Policy.

A **Personal interest** is any interest arising from your private or non-work life that can influence you or bring financial or other material benefits or result in disadvantages to the public interest.

Importantly, your personal interests can include the interests of your Close Family Members, associates and connections.

Personal interests that may create a conflict of interest include:

- Your financial interests and that of your family, friends and associates;
- People who are friends or more than acquaintances;
- Connections to people who have provided or may provide you and those close to you with advantages and/or income;
- Organisations, memberships and clubs, and the people connected to them;
- People and entities who offer or give you gifts, benefits or favours; and
- Other close associates or connections.

4.3 Types of conflict of interest

Conflicts of interest can be:

- **Actual** - where the performance of your public duties is influenced by a competing personal interest;
- **Perceived** - where a reasonable person could perceive that the competing personal interests could influence the performance of your public duties. For perceived conflicts of interest, it does not matter whether you are actually influenced but instead involves an objective assessment of the perception created by the circumstances; or

- **Potential** – where your current personal interests have the potential to conflict with your public duties in the future.

The two main types of interests that can cause a conflict are:

- **Financial interests** which are interests with a reasonable likelihood or expectation of financial gain or loss to you or to someone associated with you; and
- **Non-financial interests** which are interests which do not relate to money but instead involve a non-financial gain or loss to you or someone associated with you.

4.4 Types of financial interests

Financial interests can be direct or indirect, short or long-term. They can involve both financial gains and losses. They also include the financial interests of your Close Family Members or close associates.

Examples of financial interests can include where you, your Close Family Members, or associates:

- Own property or hold shares;
- Hold positions or interests in companies, trusts, joint ventures, partnerships, or any other organisations;
- Have an option to buy or sell an asset, including land, or any other anticipated future financial benefit;
- Are in debt to others;
- Receive a gift or hospitality from someone which results in you feeling indebted or under an obligation to that person or organisation;
- Participate in secondary or external employment that conflicts with your public duties for Landcom; or
- Connections to former or future employment or business opportunities.

4.5 Types of non-financial interest

Examples of non-financial conflicts of interest might include personal relationships where there are common interests, such as kinship, friendship, membership of an association, professional groups, and sporting, social, or cultural activities.

Non-financial conflicts of interest may also occur where you hold strong personal beliefs or attitudes that could influence, or may be perceived to influence, your impartiality, for example, feelings of enmity or hatred towards a person or organisation.

5 Recognising conflicts of interest

In most cases, only the individual member of Staff will be aware that a conflict of interest exists or could exist. Because of this, the onus is on the individual to identify possible conflicts of interest and declare them in accordance with this Policy.

It can be challenging to objectively assess whether Staff members personal interests are in conflict with their public duties. But you should always err on the side of caution and speak to your People

Manager or a member of the Legal team if you are unsure. If there is any doubt, a declaration should be made.

5.1 The conflict of interest test

An objective, rather than subjective, test must be used to determine whether there is (or could be) a conflict of interest. The perspective used is that of a hypothetical, fair-minded, and informed observer – the reasonable person.

The following four questions will help you objectively determine whether a conflict of interest does or could exist:

1. Do you have a personal interest?
2. Do you have a public duty?
3. Is there a connection between your personal interest and your public duty?
4. Could a reasonable person objectively assessing this, perceive that the personal interest might be favoured?

Importantly, it does not depend on the character of the individual who's declared the conflict but on the specific circumstances. The key issue to consider is whether your ability to act equally, fairly and impartially may be compromised, OR be perceived to be compromised, either now or in the future.

6 Declaring conflicts of interest

6.1 Overarching Obligations

- You must identify and declare any conflicts of interests which arise in the course of your public duties.
- As soon as you become aware of a situation that could create a conflict of interest either now or in the future, you are required to make a declaration to the Head of Legal, your People Manager or a member of the Legal team at your earliest opportunity.
- If you are unsure whether a conflict exists, please contact your People Manager or a member of the Legal team to discuss.
- If the conflict of interest could impact on an active Landcom transaction or market process, the declaration must also be made to the decision-maker for that transaction or market process at your earliest opportunity.
- If there is any doubt as to whether a conflict exists, it is better to make a declaration as this will protect you from the appearance of unethical or impartial behaviour. It will also allow Landcom to objectively assess your declaration and, if it is a conflict, implement any required actions to manage the risks.

6.2 How to Declare a Conflict of Interest

Conflicts of interest declarations can be made in a number of ways, including:

- By submitting [an online Conflict of Interest form on the Hub](#). These declarations are monitored by the Head of Legal and the Legal team;

- By email to the Head of Legal, your People Manager, a member of the Legal team and/or relevant decision-maker/s;
- Verbally to the Head of Legal, your People Manager, a member of the Legal team and/or relevant decision-maker/s; or
- If made verbally in a meeting, the declaration is to be recorded in the minutes of the meeting and followed up by an email to the Head of Legal, your People Manager, or a member of the Legal team. If the meeting is part of a market process, the relevant decision-maker/s should also be included in the email.

In circumstances where an initial written declaration is not possible, you must make a verbal declaration to the Head of Legal, your People Manager and/or the decision-maker at your earliest opportunity. You must follow up by making the declaration in writing as soon as possible after the verbal declaration.

Where a declaration requires further assessment, either to determine whether it is a conflict or the best way to manage it, Staff are to exercise caution and not participate in decision-making until the relevant determination has been made and any actions required to manage the conflict implemented.

Where Staff become aware of a conflict of interest involving another member of Staff or public official, they may raise the matter with the individual concerned if they are comfortable doing so. If they are uncomfortable or it is apparent that the interest has not been or is not going to be declared, Staff are encouraged to raise it with the Head of Legal, their People Manager and/or the decision-maker for an active transaction or market process. If the conflict of interest directly relates to the Head of Legal or your People Manager, you have the option of reporting it directly to the EGM Operations & Culture or the CEO.

If Staff suspect the matter involves potentially corrupt conduct, maladministration or serious or substantial waste, Staff can make a report to a Disclosures Officer or the Disclosures Coordinator in accordance with the [Public Interest Disclosure Policy](#).

If a conflict of interest has been declared to you as a People Manager, you must promptly report it to the Head of Legal and the head of any relevant committee or panel (if part of an active market process). The report to the Head of Legal and the head of any relevant committee and panel should be in writing and include details of the conflict and any actions taken to manage the conflict to date.

Details of all conflicts of interest and the actions taken to manage them are added to the Register of Conflicts of Interest maintained by the Legal team.

7 Oversight and assurance of conflicts of interest declarations

Landcom maintains oversight and assurance of conflicts of interest declarations in many ways, in accordance with the Staff Code of Conduct and this Policy. This includes by;

- The Legal team maintaining a central Register of Conflicts of Interest which records all conflicts of interest declared. The Register records details of the conflict and the actions taken to manage it;

- Publishing a Staff Declared Conflicts of Interest Table on the Hub, to alert Staff to ongoing conflicts of interest declared by other Staff;
- Maintaining a Register of Interests and Associations in line with requirements of, Treasurer's directions, and Australian accounting standards, in particular AASB 124 Related party disclosures and as best practice;
- By requiring Directors, the CEO and the ExCo to complete a Related Party Transaction Statement ('**Declaration**') annually, and whenever changes occur, as part of Landcom's financial statement disclosures;
- Requiring relevant Staff, being Staff acting or holding Level 1, 2 or 3 positions in the [CEO Delegations Manual](#) and other Staff in vulnerable or high risk positions, as determined by the Head of Legal are required to complete an Annual Declaration of Interests and Associations. These Declarations create the Annual Declaration of Interests and Associations Register, which is analysed each year and used to support Landcom's management of conflicts of interest;
- Relevant Staff must complete a Declaration of Interests and Associations when conducting certain procurement activities or market processes, such as the evaluation of tenders; and
- By requiring Staff involved in:
 - Acquisitions or potential new projects;
 - Direct negotiations; or
 - Self-assessments pursuant to Division 5.1 of the Environmental Planning & Assessment Act 1979,to complete upfront conflicts of interest declarations, which are reviewed and periodically re-declared.

8 How Landcom manages conflicts of interest?

8.1 Declare, declare, declare

The first and most important step in managing any conflict of interest is to declare it, preferably in writing to avoid disputed accounts of conversations and whether the full extent of the interest or conflict was properly declared.

In addition, you are required to make new or revised declarations if there is a significant change in the nature of your personal interest or the conflict of interest. This includes if you change roles or report to a different People Manager, where you should apprise your new People Manager of the details of your conflict of interest and the actions implemented to manage it.

All conflicts must be reported to the Head of Legal for entry into the Register of Conflicts of Interest. This gives Landcom central oversight of existing conflicts of interest and the actions being taken to manage them, even though Management is responsible for managing conflicts of interests which arise in the course of your day-to-day public duties.

For material conflicts, the Head of Legal and/or the CEO will assess the conflict and provide additional guidance, including in respect to deciding what, if any action, is necessary. They will

also inform the ExCo and the ARMC of the material conflict and the actions being taken to manage or mitigate the risks.

8.2 Avoiding conflicts of interest

While having a conflict of interest is not necessarily wrong, you should avoid placing yourself in conflicting situations where it is practical to do so. This can be achieved by avoiding:

- Assignments and tasks that could conflict with your private interests (which you should discuss with your People Manager);
- Land purchases, investments or financial arrangements that could relate to your public duties;
- Commercial dealings with suppliers and other stakeholders, especially those that are not on an arm's length basis;
- Situations in which professional relationships could develop into personal relationships; and
- Social media activity that could be perceived as compromising your impartiality.

8.3 Managing declared Conflicts of Interest

In managing conflicts, the interests of Landcom and the public interest must always be prioritised over personal interests. Once a conflict of interest is declared, the options available for resolving it are varied, depending on an objective assessment of all the circumstance.

Once your conflict of interest has been declared in accordance with this Policy, you must:

- Adhere to the agreed actions and documented approach to managing your conflict of interest;
- Promptly notify the Head of Legal and your People Manager in writing of any significant changes to your conflict or submit a new conflict of interest declaration; and
- Regardless of your declarations and actions to manage it, ensure that you never favour your personal interests.

Actions to manage the risk of the conflict will be considered by the Head of Legal and your People Manager and communicated to you. These may include:

- Asking you to dispose of the conflicting interest;
- Asking you not to participate in decision-making relating to the conflict;
- Preventing you from working on or accessing information relating to the conflict; or
- As a final resort, if the conflict is very serious and cannot be otherwise managed, asking you to change roles or resign.

8.4 Likely areas for conflicts of interest at Landcom

Areas where you may face possible conflicts of interest include land and property dealings, dealings with other businesses that are Suppliers or related to Landcom, and secondary or external employment. The following sections provide guidance on how these potential areas of conflicts are administered and managed in a fair, transparent, and accountable manner.

8.4.1 Land and property dealings

All Staff and Directors must obtain prior written approval from the CEO in accordance with the [Staff Purchase Policy](#) and [Staff Purchase Procedure](#) before purchasing land under Landcom control. This includes land owned by our partners or other vendors for whom Landcom acts. It also applies to your Close Family Members and associates.

As per the [Staff Purchase Procedure](#), the Legal team will maintain a Staff Purchase Log, to ensure that there is effective oversight of these purchases.

8.4.2 Personal dealings with suppliers and service providers

You should avoid personal purchases or engaging services from Suppliers and Landcom service providers, especially where the Supplier is aware you work for Landcom. You must ensure that any purchases or engagements are at arm's length which means that they must be made without the Supplier being aware that you work for Landcom to maintain independence, be at fair market value, on terms which are fair and reasonable and available to the public at large, with no collusion or special arrangements. Staff are required to declare all Supplier related personal purchases or services they engage, even if they are engaged at arm's length.

Staff are not to seek discounts or favourable terms from Suppliers for personal purchases under any circumstances, as this will create a conflict of interest. If you are in any doubt, please seek advice from your People Manager or the Head of Legal.

8.4.3 Inside information

You must not use inside information obtained while performing your public duties for personal gain. This includes using inside information to obtain financial benefit or work outside Landcom, or to benefit friends, relatives and business associates.

Inside information includes:

- information that is not publicly available; or
- information that could reflect favourably or unfavourably on the investment value or future market value of business stock, shares, securities, and other investments, such as property.

This also includes Landcom intellectual property and the commercially advantageous information Landcom may receive due to its status as a State-Owned Corporation, which is not in the public realm. This information can potentially give Landcom a competitive advantage as it may not be available to other private sector developers.

Unless it is an inherent requirement of your role at Landcom or otherwise approved by the CEO or your EGM, you must not discuss the prices, nature and extent of Landcom's services which are not within the public realm with any external party.

Staff must comply with the [Media & Social Media Policy](#) in respect to handling and disclosing information about Landcom's business activities at all times.

8.4.4 Secondary/external employment and private commitments

You must not be employed or participate in any business outside Landcom that could:

- Adversely affect your public duties for Landcom;
- Affect your ability to make impartial decisions in Landcom's or the public's best interests; or
- Make you morally or legally responsible to another party.

Because secondary or external employment and private interests can easily create conflicts of interest, CEO approval is required for Staff to undertake private paid or unpaid secondary employment or external directorships, subject to the exceptions outlined in the Staff Code of Conduct.

Written approval from the CEO must be obtained before you accept or begin the private paid or unpaid secondary employment or external directorships. Once obtained, Staff are required to provide to the Head of Legal for entry into the External Employment Register maintained by the Legal team.

This can be done by completing and submitting an [online External Employment Declaration and Approval form](#), available on the Hub. Alternatively please email the details of the external employment and CEO approval to the Head of Legal (or another member of the Legal team). You must inform the CEO and the Head of Legal in writing if any changes to your approved secondary employment or private interests occur.

Directors, independent chairs and ExCo must declare any private interest that may affect a Board decision.

Staff are encouraged to join non-profit charitable, social, political or sporting bodies where there are no conflicts of interest. However, you must not use your position in Landcom, its assets or information obtained in the course of your public duties when engaging in such pursuits, especially if you join a political or semi-political organisation.

8.4.5 Conflict of Duties

A conflict of duties exists when a reasonable person might perceive that a public official or agency has multiple public duties that could be incompatible with each other or could create situations where one public duty may be favoured over another.

This conflict of duties could impair or be perceived to impair a Staff member's or Landcom's ability to be fair, impartial and transparent. Failing to properly address conflicts of duties can result in Landcom deriving benefits at the expense of its stakeholders or some stakeholders being favoured at the expense of others. Examples of conflicts of duties include:

- Where a Staff member has been put on an industry board as a representative of Landcom. That member of Staff may have a duty to the board to treat information discussed at board meetings as confidential but may also have a duty to Landcom to keep it informed about significant issues concerning the board.
- Conflicts between Landcom's status as a NSW state owned corporation and resulting legal compliance obligations and Landcom's legislative objective under Section 6(1)(a) of the

Landcom Corporation Act 2001 for Landcom to be a successful business and operate at least as efficiently as any comparable business.

Consequences of not identifying or addressing issues in respect to conflicts of interest may include:

- Decisions being challenged;
- Compensation and other financial damage;
- Erosion of Landcom's brand and reputation; and
- Creating the impression that Staff or Landcom itself is not acting in a stakeholder's or the public interest.

Steps which can be considered to address conflicts of duties can include:

- Identifying conflicts of duties, including an assessment of the risks;
- Removing one of the duties creating the conflict;
- Enhancing accountability and transparency; and
- Considering fairness and whether the organisational structure is appropriate.

ICAC's publication, [Managing Conflicts of Duties in the NSW public sector](#) can be referenced for more information on conflicts of duties and how to address them.

9 Roles and responsibilities

9.1 Board and Directors:

Directors must:

- Comply with this Policy and declare any perceived, actual or potential conflicts of interest; and
- Satisfy the Board that they have put measures in place to manage declared conflicts or have removed the conflict.

The Board may determine and resolve that it is satisfied that the interest does not disqualify the Director involved. If so determined, the Director may receive Board reports on the matter and take part in deliberation and voting. In this case, the conflict involved and the reasons for the decision not to exclude the Director must be recorded.

Where it is not possible to remove or manage the conflict, the Director involved:

- Must not receive Board reports on the matter; and
- Must leave the meeting during any deliberation or voting on the matter, and their entry and exit must be recorded in the minutes.

A Director should resign from the Board where a conflict significantly affects a Director's ability to take part in the majority of the Board's deliberations.

Directors should:

- Consult with the Chair before accepting a new external role or appointment to consider whether a perceived, actual or potential conflict of interest may arise; and

- Notify the Chair and the Company Secretary as soon as practicable of any changes to their interests. The Company Secretary will maintain a full register of Directors' interests and provide a summary of this for each scheduled Board meeting.

9.2 The CEO

The CEO is responsible for ensuring that:

- Systems are in place to ensure that conflicts of interest are managed effectively; and
- Information about conflicts of interest and this Policy is brought to the attention of Staff.

9.3 ExCo and Management

ExCo and Management are responsible for:

- Ensuring that Staff are aware of this Policy and their obligations in respect to conflicts of interest;
- Identifying risks specific to their division that could give rise to conflicts of interest. They are also responsible for putting appropriate controls in place to address them;
- Reviewing actual, perceived or potential conflicts of interest as soon as they are reported or arise;
- Reporting all conflicts of interest to the Head of Legal in a timely manner, including the details of the conflict and the action taken to manage the risk;
- Helping to manage, resolve or deal with the conflict of interest, including the implementation of any actions put in place to manage it;
- Providing advice and assisting Staff with appropriate ways to declare and manage any conflict; and
- Seeking advice from the Head of Legal or the Legal team as to whether a conflict of interest exists or how it should be resolved or managed;

9.4 The Head of Legal and the Legal team

The Head of Legal and the Legal team are responsible for:

- Providing advice to Staff and Management as to whether a conflict of interest may exist and how it should be best managed, resolved or dealt with;
- Updating and maintaining the Register of Conflicts of Interest, the External Employment Register and the Staff Declared Conflict of Interest Table and reporting on it, as required. This includes reporting any material conflicts of interest to ExCo and the ARMC; and
- Conducting the Annual Declaration of Interests and Associations process, including updating and analysing the Annual Declaration of Interests and Associations Register, and reporting on this process to ExCo and the ARMC.

9.5 All Staff

All Staff:

- Owe your primary business loyalty to Landcom, in accordance with the Staff Code of Conduct;

- Are required to avoid conflicts of interest and/or creating conflicts of interest for others;
- Are accountable to Landcom, the CEO, the Board, and the NSW Government for your decisions and general conduct. You must perform your public duties with integrity, impartiality, honesty, conscientiousness, care, skill, diligence, and loyalty to the public interest;
- Must declare a conflict of interest to your People Manager and the Head of Legal, or a member of the Legal team as soon as possible after you become aware of it;
- Must avoid, resolve, or otherwise manage the conflict of interest in consultation with the Head of Legal and your People Manager;
- Must comply with the actions implemented by the Head of Legal and your People Manager to manage the conflict; and
- Should make a public interest disclosure in accordance with Landcom's Public Interest Disclosure Policy, if you become aware of a conflict of interest which has not been declared or appropriately managed, and you feel that this failure may constitute corrupt conduct, maladministration or a serious and substantial waste of resources.

10 Managing personal information

Conflicts of interest often involve the disclosure of personal information, such as details about your personal finances and relationships. While you must disclose this information if it creates a conflict of interest, the personal information provided in your declaration will be held confidentially and only shared internally if needed.

The exception to this is the limited information about ongoing conflicts of interest which staff have declared and which are published on the Staff Declared Conflict of Interest Table, as outlined in Section 7.

The personal information will be held securely, with access restricted to the CEO, EGM Operations & Culture, Head of Legal and/or members of the Legal & Compliance team. It may also be shared with members of the People & Culture team. In certain circumstances, the information may be made available to the ARMC or the Board, the Portfolio and Shareholder Ministers and/or reviewed by the NSW Audit Office or other auditors or provided to Landcom probity advisors for advice.

11 Breaches

- You will breach this Policy if you:
 - Fail to declare an actual, perceived or potential conflict of interest or do not declare it in a timely manner;
 - Fail to comply with your responsibilities and obligations under this Policy; or
 - Fail to provide an updated declaration, should your circumstances change and a conflict may arise.
- Breaches of this Policy will be taken seriously and may result in serious consequences for the individual, including disciplinary action.
- Breaches that could amount to corrupt conduct will be reported to the ICAC.
- Breaches that amount to criminal conduct will be reported to the NSW Police.

- You should also report any reasonably suspected breaches of this Policy to the Head of Legal or, where applicable, in accordance with the Public Interest Disclosure Policy.

Document Control Table

Document information	
Document approver	Chief Executive Officer
Document owner name	Head of Legal
Document delegate name/s	Solicitor & Right to Information Officer
Document version number	4.0
Document version date	17 June 2025
Document review cycle	Every three years
Next document review date	June 2028
Document location	External use Landcom.com.au
Document level	2 = CEO approved document

Linked artefacts	
Linked documents	CEO Delegations Manual Code of Conduct for Suppliers Fraud & Corruption Control Framework Fraud Control & Corruption Prevention Policy Gifts & Hospitality Policy Media & Social Media Policy Public Interest Disclosure Policy Staff Code of Conduct Staff Purchase Policy and Staff Purchase Procedure
Linked legislation	Government Sector Finance Act 2018 Independent Commission Against Corruption Act 1988 Public Interest Disclosure Act 2022
Linked risks	Reputational Regulatory Financial

Revision history			
Version	Approval date	Author	Description
4.0	17/06/2025	Carina Carter	Significant review to align with the updated Fraud & Corruption Control Framework and to reflect organisational changes
3.0	23/11/2022	Carina Carter	Periodic review and update to reflect organisational change
2.2	29/10/2020	Carina Carter	Periodic review and update to reflect organisational change
2.1	27/07/2018	Carina Carter	Review and update after organisational change

Revision history		
2.0	April 2016	Review following organisational change

Annexure A Landcom’s Conflict of Interest Control Framework

