

Conflict of Interest Policy
1. Introduction and Principle

A conflict of interest arises whenever the **personal, professional, financial, or business interests** of an employee are potentially or actually at odds with the best interests of Altaira. This includes situations where an employee's private interests could improperly influence, or appear to influence, their judgment in carrying out their duties.

1.1 Policy Principle

All employees are required to act in good faith and with utmost integrity towards Altaira. Where a conflict occurs (or is perceived to occur), the interests of Altaira will be balanced against the interests of the staff member and, unless exceptional circumstances exist, the conflict **must be resolved in favour of Altaira**.

2. Scope and Definition of Conflict
2.1 Policy Scope

This policy applies to all Altaira employees, contractors, consultants, and temporary workers. References to "employee" include these groups.

2.2 Categories of Conflict

A conflict of interest may include, but is not limited to, situations involving:

- **External Employment:** Engaging in other work that directly or indirectly competes with Altaira, or affects performance/attendance at Altaira.
- **Financial Interests:** Holding a significant financial interest (e.g., shareholding) in a client, supplier, competitor, or host organization.
- **Gifts, Benefits, and Hospitality:** Accepting gifts, favours, or excessive hospitality from a third party that could influence business decisions.
- **Related Parties:** Any business transaction or decision involving relatives, close friends, or private entities controlled by the employee or their immediate family.
- **Confidential Information:** The misuse of Altaira's confidential information or intellectual property for personal gain or for the benefit of an external entity.

3. Mandatory Procedure and Disclosure

Employees must take proactive steps to prevent conflicts from arising and must adhere to the following mandatory disclosure procedure:

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CONFLICT OF INTEREST POLICY

Action	Timing	Requirement
Initial Declaration	On becoming employed by Altaira.	Declare any potential, actual, or perceived conflicts of interest that currently exist.
Ongoing Declaration	As soon as the conflict arises or is likely to arise.	Declare any potential, actual, or perceived conflicts of interest that develop during employment.
Avoidance	Continuously.	Employees must aim to avoid being placed in a situation where such a conflict exists or may be perceived to exist.

3.1 Disclosure Process

1. All declarations must be made to the employee's **Altaira Manager** or, for Managers, to a **Director**.
2. The disclosure must be made using the **Altaira formal declaration form** and documented centrally.
3. Altaira will review the potential conflict with the employee and jointly agree on practical arrangements to manage or resolve the situation (e.g., recusal from decision-making, transfer of duties, or termination of the external interest).

3.2 External Employment and Multi-Agency Work

1. **Acceptable Multi-Agency Work:** Altaira acknowledges that many employees work for **multiple healthcare or staffing agencies**. This practice is generally acceptable and does not require a formal declaration, provided it adheres to the restrictions below.
2. **Required Disclosure:** Employees **must** disclose any other employment that:
 - a. Relates to a **directorship or significant management role** in another healthcare, staffing, or consulting entity.
 - b. Is with a **competitor** *other* than an approved multi-agency relationship.
3. **Performance and Confidentiality:** All external involvements, including multi-agency work, must **not**:
 - a. Affect the employee's performance, attendance, or capacity to perform duties whilst working for Altaira.
 - b. Involve the disclosure or use of Altaira's confidential or proprietary information.
 - c. Involve soliciting Altaira's staff or clients for the benefit of another agency or company.

If an external involvement affects performance or attendance, it will immediately be considered an unmanaged conflict of interest.

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4. Consequences of Non-Compliance**4.1 Competition and Misuse of Resources**

Employees **must not** set up or engage in private business or undertake other employment in **direct competition** with Altaira, especially if it involves using knowledge, client data, or materials gained during the course of employment with Altaira.

4.2 Disciplinary Action

Failure to declare a potential, actual, or perceived conflict of interest or failure to take remedial action agreed with Altaira, in a timely manner, may result in disciplinary action.

Engaging in other business interests during Altaira work hours or using Altaira resources (e.g., phones, email, time) for personal or external business activities will result in disciplinary action. Disciplinary action may include warnings, suspension, or **termination of employment** in accordance with Australian employment law.

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