

# CONFLICT OF INTEREST REGISTER AND DISCLOSURE POLICY

## WHITTAKER'S WINGS FOUNDATION LIMITED

ABN 99 672 377 678

### **Purpose and Scope**

This Conflict of Interest Register and Disclosure Policy is established to ensure that officers of WHITTAKER'S WINGS FOUNDATION LIMITED (hereafter referred to as "the charity") act in the best interests of the organization and to manage and disclose any conflicts of interest that may arise during their tenure.

This policy applies to all officers, including trustees, board members, and individuals in positions of significant influence over the management or administration of the charity.

### **Definition of Conflict of Interest**

A conflict of interest arises when an officer's personal interests or loyalties could impact their ability to make decisions in the best interest of the charity. This includes situations where officers may benefit financially or otherwise from the charity, or when their duties to the charity conflict with duties or loyalties to another organization or person.

### **Types of Interests**

#### **1. Family Member Interests:**

- Officers must disclose any interests that their immediate family or spouse/partner may have in the charity or its work.
- Regular review and updates to the Conflict of Interest Register are essential to capture any changes in family member interests.

**2. *Contract/Employment Interests:***

- Officers with contracts to provide services to the charity must disclose such related party transactions.
- Consideration must be given to potential conflicts arising from employment outside the charity, especially if it is in a similar field.

**3. *Other Interests:***

- Officers must disclose their involvement with other charities or not-for-profit groups relevant to their position in the charity.
- Any person in an officer's life who might have influence over them and is linked to the charity in a significant way should be disclosed.

**Disclosure Process**

**1. *Identify:***

- Officers must declare any interests at the beginning of each meeting.
- A comprehensive Conflict of Interest Register will be developed and continuously updated to record potential conflicts.

**2. *Record:***

- Before making any decisions, the charity must carefully consider conflicts identified in the register.
- Details of discussions and decisions should be recorded in both meeting minutes and the Conflict of Interest Register.

**3. *Discuss:***

- At the start of each governing group meeting, the presence of any conflicts relevant to the agenda must be determined.
- If a conflict is identified, the governing body should decide whether the officer concerned can participate in decision-making or should leave the room.

**4. *Prepare:***

- In cases of conflicts or related party transactions, a Memorandum of Agreement (MOA) or other legally binding document should be drafted to manage the conflict appropriately.

## **Compliance and Enforcement**

Any breach of this policy may result in disciplinary action, including removal from the position of an officer or trustee. The charity will regularly review and update this policy to ensure its effectiveness and compliance with legal requirements.

## APPENDIX 1

### WHITTAKER’S WINGS FOUNDATION LIMITED

#### CONFLICT OF INTEREST REGISTER

This conflict of register is to be maintained by the designated individual responsible for governance oversight within WHITTAKER’S WINGS FOUNDATION LIMITED. All updates and changes to this register should be documented promptly, and the register should be reviewed at least annually to ensure its accuracy and completeness.

**Officer’s Name:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Position:** \_\_\_\_\_

**Family Member Interest:**

Family Member Name	Nature of Interest	Value of transaction or interest (if applicable)	Date Disclosed	Has the Board been notified?	Steps taken by board to address the conflict
Crystal Joanne Zeeman, a Director of WHITTAKER’S WINGS FOUNDATION LIMITED, is the wife of Ryan Michael	Spouse (due to their legal marriage)		14/04/2025	Yes	Crystal Joanne Zeeman, a Director of WHITTAKER’S WINGS FOUNDATION LIMITED, is the spouse of Ryan

<p>Zeeman, a related party under the Australian Charities and Not-for-profits Commission (ACNC) governance standards. This relationship constitutes a related party connection due to their legal marriage, which requires careful management of potential conflicts of interest in accordance with ACNC guidelines.</p>					<p>Michael Zeeman.                  This legal marriage constitutes a related party relationship under the Australian Charities and Not-for-profits Commission (ACNC) governance standards.                   In compliance with the ACNC Governance Standards, Crystal Joanne Zeeman will abstain from participating in discussions or decisions where her familial relationship could lead to actual, potential, or perceived conflicts of interest. This approach ensures transparency and maintains the integrity of the Charity's decision-making processes.</p>
--	--	--	--	--	---

**Other Interests:**

Description of Interest	Relevant Organisation/Group	Date Disclosed	Has the Board been notified ?	Value of transaction or interest (if applicable)	Steps taken by board to address the conflict
Crystal Joanne Zeeman serves both as a Director of WHITTAKER'S WINGS FOUNDATION LIMITED (the Charity) and as a Director of a for-profit entity that donates to the Charity.	Whittaker & Friends Pty Ltd	14/04/2025	Yes		In order to mitigate any actual or perceived conflicts of interest, Crystal Joanne Zeeman will be excluded from all decisions concerning the allocation of donations to the Charity.
Given Crystal Joanne Zeeman's dual roles, there is a potential or perceived conflict of interest with respect to decisions involving donations from the Whittaker & Friends Pty Ltd to the Charity. This		14/04/2025	Yes	10% of its sales revenue from a particular product.	In order to mitigate any actual or perceived conflicts of interest, Crystal Joanne Zeeman will be excluded from all decisions concerning the allocation of donations to the Charity.

needs to be managed in accordance with governance standards to ensure that the decision-making process remains transparent and impartial.					
---	--	--	--	--	--

**Date of Review:** \_\_\_\_\_ *(To be updated at least annually)*

### Summary of Officer's Declaration

I, \_\_\_\_\_, acknowledge that I have reviewed and disclosed all relevant interests as outlined in the Conflict of Register and Disclosure Policy of WHITTAKER'S WINGS FOUNDATION LIMITED. I understand the importance of continuously updating this register to reflect any changes in my interests.

**Officer's Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_