

# CONFLICT OF INTEREST

A close-up photograph of a bee on a flower branch, overlaid with a blue tint. The bee is positioned in the upper right quadrant, facing left. The flower branch has several buds and small flowers. The background is a soft, out-of-focus blue.

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## Statement of Policy

**creativeterritory**  
PASSION | INTEGRITY | RESILIENCE

# Conflict of Interest Policy

## Statement of commitment

Creative Territory Pty Ltd (“the Company”) is committed to conducting its operations with the highest standards of integrity, transparency, and ethical responsibility. As a consultancy specialising in stakeholder engagement, we operate in diverse and often sensitive environments where impartiality and trust are paramount.

We recognise that conflicts of interest – whether actual, potential, or perceived – can compromise the integrity of our work, erode stakeholder confidence and expose the Company and our clients to reputational and legal risk.

This Policy affirms our commitment to proactively identifying, disclosing and managing conflicts of interest in accordance with applicable Australian legislation and internationally recognised standards, including:

- ISO 37009:2025 – Conflict of Interest in Organizations – Guidance
- OECD Guidelines for Managing Conflict of Interest in the Public Service (2003)
- United Nations Convention Against Corruption (UNCAC)
- Australian Public Service Code of Conduct
- Public Governance, Performance and Accountability Act 2013 (PGPA Act)
- ICMM Mining Principles, particularly:
  - Principle 1: Ethical Business Practices
  - Principle 10: Stakeholder Engagement
  - Position Statement: Transparency of Mineral Revenues

Creative Territory Pty Ltd considers ethical conduct and the avoidance of conflicts of interest to be foundational to its mission of delivering inclusive, transparent and accountable stakeholder engagement services.

## Scope and applicability

This Policy applies to all individuals and entities engaged by or representing Creative Territory Pty Ltd, including but not limited to:

- Permanent and temporary employees
- Independent contractors and consultants
- Directors and board members
- Interns, volunteers and secondees
- Subcontractors and third-party service providers

The Policy governs all professional activities undertaken in the course of stakeholder engagement, including:

- Community consultation and facilitation
- Strategic communications and advisory services
- Policy development and analysis
- Public-private partnership support
- Indigenous engagement and cultural liaison
- Environmental and social impact assessments

This Policy is binding regardless of the geographic location of the engagement or the nature of the client (government, corporate, nonprofit or community-based). It applies throughout the lifecycle of a project, from initiation and planning through to implementation, reporting and evaluation.

This Policy is effective as at 1 July 2025.

## Principles of conflict of interest management

Creative Territory Pty Ltd adopts the following principles in managing potential or actual conflicts of interest:

- **Integrity:** All decisions and actions must be guided by honesty and the best interests of clients and stakeholders.
- **Transparency:** Conflicts must be disclosed promptly and managed openly.
- **Accountability:** Covered Persons are responsible for identifying and managing their own conflicts.
- **Equity:** All stakeholders must be treated fairly and without bias.
- **Compliance:** All conduct must conform to applicable laws, regulations, and professional standards.

## Identification and disclosure obligations

All personnel must:

- Conduct a self-assessment to identify any actual, potential, or perceived conflicts of interest prior to commencing any engagement.
- Disclose conflicts in writing to the Managing Director or designated Ethics Officer using the prescribed Conflict of Interest Disclosure Form.
- Update disclosures as circumstances change or new conflicts arise.
- Seek guidance when uncertain about the existence or implications of a potential conflict.

## Management and resolution procedures

**Assessment:** The Ethics Officer will assess the nature and severity of the conflict, referencing ISO 37009 and OECD guidelines.

**Management Plan:** A tailored plan will be developed, which may include:

- Recusal from specific projects or decisions
- Reassignment of responsibilities
- Termination of conflicting relationships
- Enhanced oversight or third-party review.

**Documentation:** All disclosures and management actions will be recorded and retained in accordance with the PGPA Act and internal governance policies.

**Monitoring:** Ongoing monitoring will be conducted to ensure compliance and effectiveness of the management plan.

## Third-party engagements

When engaging with external stakeholders, clients or subcontractors, Creative Territory Pty Ltd shall:

- Conduct due diligence to identify potential conflicts of interest.
- Require third parties to disclose any conflicts relevant to the engagement.
- Include conflict of interest clauses in contracts and service agreements.
- Ensure that stakeholder engagement processes are designed to mitigate bias and promote inclusivity.

## Enforcement and reporting

Non-compliance with this Policy may constitute misconduct and result in disciplinary action, including termination of employment or engagement. Serious breaches may be referred to external regulatory or law enforcement authorities.