



Triathlon ACT Incorporated

Conflict of Interest Policy

Version	1.0
Date adopted by TACT Board	22 July 2025
Effective Date	22 July 2025
Review Frequency	Annual



1. Introduction

To meet its obligations under applicable laws, and to ensure good corporate governance, Triathlon ACT is required to implement adequate conflicts management arrangements.

Triathlon ACT's Conflicts of Interest Policy (**Policy**) sets out the framework for identifying, preventing and managing conflicts of interest, whether actual, potential or perceived.

This Policy applies to all Triathlon ACT board members, employees and consultants whether employed by Triathlon ACT or AusTriathlon (**Person**).

2. What is a Conflict of Interest?

A conflict of interest refers to a situation where the interests of a Person may be incompatible with those of Triathlon ACT, AusTriathlon or a member or stakeholder of Triathlon ACT or AusTriathlon. It also refers to a situation where a Person (or an associate of a Person) may receive a benefit as a result of a decision made by Triathlon ACT.

Triathlon ACT will take all appropriate steps to identify and to prevent or manage conflicts of interest between Persons, Triathlon ACT and its members and stakeholders.

3. Identifying Conflicts of Interest

Triathlon ACT board members must complete an annual Statement of Interest in the form contained in **Schedule 1**.

Each Person is required to:

- a) act reasonably and employ good judgment in identifying and responding to potential conflict situations, as well as recognising when to seek assistance or escalate them in a timely and appropriate manner; and
- b) disclose actual, potential or perceived conflicts to the Triathlon ACT board.

It is the responsibility of each Person to understand their obligation to check whether a new or proposed activity may create a conflict.

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4. Types of conflict

Conflicts of interests can arise when:

- a) Persons have personal, business or other interests that put them in a position where they (or an associate) can benefit either personally or professionally from Triathlon ACT, (including by receiving a financial gain);
- b) Persons have personal, business or other competing interests that conflict with Triathlon ACT's interests;
- c) a Person's interests differ from the interests of Triathlon ACT for example where a Person:
 - acquires confidential knowledge about Triathlon ACT or AusTriathlon that is likely to advance their or an associate's interests;
 - may make a financial gain or avoid a financial loss at the expense of Triathlon ACT;
 - has a competing business or event with Triathlon ACT; or
 - has an incentive to favour the interests of one (or a group of) member or stakeholder over another (or a group of) stakeholder or member.

5. Managing Conflicts of Interest

Triathlon ACT has put in place systems and controls to prevent or manage conflicts of interests including:

- a) Disclosure and monitoring of personal conflicts: Person's personal activities which may give rise to potential conflicts are subject to disclosure and monitoring. Triathlon ACT will maintain a Register of Interests in the form at **Schedule 2**. Each meeting agenda will also require Persons to disclose actual, potential or perceived conflicts that arise.
- b) Escalation: if a conflict is identified the Triathlon ACT board will assess and determine the most appropriate response.
- c) Avoidance: where conflicts of interest pose a potentially serious impact, the only way to adequately manage those conflicts may be to avoid them by removing the Person from decision-making on an issue.
- d) Further disclosure: Triathlon ACT may elect to disclose actual or perceived conflicts of interest to members or stakeholders.

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6. Governance

The approval, review, update, oversight, monitoring and reporting of this Policy is governed by Triathlon ACT's governance framework.

