
DOB ENTERPRISES PTY LTD

DOB Conflict of Interest Policy IMS-542-00-POL



DOB ENTERPRISES PTY LTD
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Revision

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Revision History

Date	Rev	Modified By	Changes Made, Review History	Reviewed by	Approved by
19.02.19	0	Sunette Opperman	Creation	S Rupert	S Rupert



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DOB Enterprises Pty Ltd t/a MBC Recruitment, MBC Nursing Agency, Macquarie Labour Hire and Watchout Training and Traffic Control is committed to provide quality services.

DOB employees, contractors and representatives are required to maintain high standards of integrity and ethical conduct. All of our employees, contractors and representatives are placed in positions of trust within the community, and we expect our employees to behave accordingly.

Our providers, clients, and contractors and their employees are also expected to respect our employees' commitments to high standards.

Internally, the conflict of interest policy ensures that our employees act professionally and ethically, protect the interests of all parties involved in an agreement, and demonstrate these values to the community.

We avoid conflicts of interest and make decisions that put DOB's interests ahead of other personal or business interests. Conflicts of interest may arise, for example, when you are in a position to decide on the employment status of a family member, when you are appointed to a board of directors or a similar function of another organisation, or when you could take personal advantage of business opportunities.

We immediately disclose such circumstances to our Director.

We recognise that we are in positions of trust and that our clients and candidates give us great responsibility, and we aim to honour and respect our relationships with everyone in the community.

We expect our employees, contractors and representatives to comply with legal, policies, procedures, industrial or administrative standards, guidelines, and any and all professional codes of conduct they may operate under. Employees, contractors and representatives are also expected to adhere to the mbc golden rules.

Purpose:

The purpose of this policy is to help DOB Management and Staff to effectively identify, disclose and manage any actual, potential or perceived conflicts of interest in order to protect the integrity of DOB and manage risk.

Scope:

This policy covers all DOB employees, contractors and representatives.

Objective:

DOB aims to ensure that all relevant parties are aware of their obligation to disclose any conflicts of interest that they may have, and to comply with this policy to ensure they effectively manage those conflicts of interest as representatives of DOB.

Definition:

A conflict of interest occurs when a person's personal interests conflict with their responsibility to act in the best interests of DOB or DOB's clients. Personal interests include direct interests, as well as those of family, friends, or other organisations a person may be involved with or have an interest in (for example, as a shareholder).



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A conflict of interest may be actual, potential or perceived and may be financial or non-financial.

These situations present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of DOB. Therefore these situations must be managed accordingly.

Policy:

Our business agreements are clear, unambiguous, fully understood and fair, whether the other party is a client, a supplier, a colleague or an associate. We honour our obligations and act fairly to enforce our rights under such agreements. Our employment contracts honestly describe the rights and obligations of our colleagues and associates.

When we are in contact with regulatory officials, we conduct ourselves in a transparent and professional manner. We never try to influence officials by inducements such as generous gifts or entertainment.

DOB does not promote a culture of gifts and entertainment. However, when we entertain clients and suppliers, we always follow local legislation and reasonable business practices. We act at arm's length and adhere to the highest standards of integrity and transparency. Generally, any doubt about the appropriateness of a particular gift or entertainment can be resolved by discussing the situation with our Director or senior Management Team.

We must only seek competitive advantages through lawful means. We never try to restrict competition by exchanging information about prices, terms and conditions, distribution of markets and strategies with our competitors, or engage in any other activities that appear to constitute collusion between competitors. We gather information about our competitors in a legally unquestionable way.

This policy has been developed to address conflicts of interest affecting DOB.

Conflict of interest are common, and they do not need to present a problem to DOB as long as they are openly and effectively managed.

It is the policy, as well as a responsibility the Director, that ethical, legal, financial or other conflicts of interest be avoided and that any such conflicts (where they do arise) do not conflict with the obligations to DOB

DOB will manage conflicts of interest by requiring all parties to:

- avoid conflicts of interest where possible
- identify and disclose any conflicts of interest
- carefully manage any conflicts of interest, and
- follow this policy and respond to any breaches.

Responsibility:

The IMS Manager and Director are responsible for:

- establishing a system for identifying, disclosing and managing conflicts of interest across DOB
- monitoring compliance with this policy, and
- reviewing this policy on a regular basis to ensure that the policy is operating effectively.
- Ensuring all parties representing DOB are aware of this policy



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Identification and disclosure of conflicts of interest:

Once an actual, potential or perceived conflict of interest is identified, it must be reported to the DOB Director Immediately and recorded on a CI Form.

Confidentiality of disclosures:

DOB's Director and IMS Manager will handle all reports of conflict of interest or suspected conflicts of interest with our strict privacy and confidentiality standards in mind.

What should be considered when deciding what action to take

- In deciding what approach to take, the Director or IMS Manager will consider whether the conflict needs to be avoided, simply documented or reported to authorities.
- whether the conflict will realistically impair the disclosing person's capacity to impartially participate in decision-making
- alternative options to avoid the conflict
- DOB's objects and resources, and
- the possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of, DOB.

The approval of any action requires the agreement of DOB's Director.

Actions can include:

- Immediate dismissal if proven in breach of this policy
- Disciplinary action
- Removal from all future dealings with client/candidate/activities
- Suspension



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