



Conflicts of Interest Policy

Qantas Cabin Crew Team Limited (ACN 664 428 997)

Effective Date: 25 June 2023

In this Policy, 'us' 'we' 'our' 'QCCT' means Qantas Cabin Crew Team Limited (ACN 664 428 997) and its wholly owned subsidiaries from time to time, if any.

1. Policy statement

- 1.1** The purpose of this Policy is to:
- (a) ensure compliance by QCCT and those persons covered by this Policy with their conflict of interest obligations under the provisions of the Corporations Act; and
 - (b) ensure conflicts of interest are identified and managed appropriately and effectively.
- 1.2** This Policy is to be read in conjunction with our Code of Conduct. It does not derogate from the responsibility of each person to comply with Australia's conflict of interest laws. Non-compliance with conflict of interest laws may be the subject of serious criminal penalties, civil liability and reputational damage.
- 1.3** Subject to section 4.1(a)(ii), which applies to directors and officers of QCCT only, this Policy applies to all Personnel.

2. Definitions

In this Policy, unless the context clearly indicates otherwise:

Administration Manager means the person appointed to the QCCT Executive Committee with the responsibility for all of QCCT's administrative matters.

Board means the board of directors.

Chairperson means the chair of the Board and the QCCT Executive Committee.

Conflicts Register means our conflicts of interest register.

Corporations Act means *Corporations Act 2001* (Cth).

Finance Manager means the person appointed to the QCCT Executive Committee with the responsibility for QCCT's finance and treasury functions.

Personnel means all of our directors, officers, employees, agents, sub-contractors, volunteers, interns and participants (whether permanent, fixed-term or temporary), both in Australia and internationally.

QCCT Executive Committee means the executive committee of QCCT appointed from time

to time, and includes (but is not limited to) the Chairperson, the Finance Manager and the Administration Manager.

3. Responsibility for this Policy

- 3.1** The Board has overall responsibility for ensuring this Policy complies with its legal and ethical obligations, and that all those under its control comply with it.

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- 3.2** The QCCT Executive Committee collectively have day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness and dealing with any queries about it. The QCCT Executive Committee's responsibilities extend to:
- (a) ensuring that conflicts of interest are identified, disclosed and managed in accordance with this Policy;
 - (b) monitoring the effectiveness of this Policy, including the understanding by all Personnel in general of the principles and spirit of conflicts of interest and developing appropriate training materials and programs for Personnel to comply with this Policy;
 - (c) ensuring that the Board is informed of any material breaches of this Policy;
 - (d) regularly reviewing this Policy for legislative changes or development of best practice, and recommending any amendments to the Board; and
 - (e) reporting to the Board regarding recommendations in relation to, and compliance with, this Policy.
- 3.3** The QCCT Executive Committee are responsible for ensuring those reporting to them understand and comply with this Policy and are given adequate and regular training on it.
- 3.4** Comments, suggestions, improvement and queries on this Policy are encouraged and should be addressed to the Chairperson.

4. Conflicts of interest obligations

- 4.1** All Personnel must avoid conflicts of interest unless specifically authorised in accordance with this Policy and, in all cases, where permitted by law. In this Policy:
- (a) a conflict of interest includes:
 - (i) when an individual's private interest (or the interest of a family member) influences, or appears to influence, the interests of QCCT as a whole; or
 - (ii) for directors and members of QCCT Executive Team, when a director or officer has a material personal interest, or appears to have a material personal interest, in a matter that relates to the affairs of QCCT as a whole;
 - (b) conflicts of interest may be actual, apparent, potential or perceived;
 - (c) conflicts of interest can relate to financial or non-financial matters; and
 - (d) family member means a spouse (including a de facto spouse) or relative (parent or child) of a person.
- 4.2** All Personnel must identify any situation which involves, or may involve, a conflict of interest.
- 4.3** All Personnel must report in writing a conflict of interest:
- (a) as soon as they become aware of a conflict of interest, to the Chairperson; and
 - (b) in the event that the disclosure of a conflict of interest is made by a director or senior executive of QCCT to the Chairperson must advise each of the directors of QCCT and table the notification at the next directors' meeting after the disclosure is made.

- 4.4** In the event that the disclosure of a conflict of interest is made by any Personnel who is not a director or senior executive of QCCT, the Chairperson must, as soon as reasonably practicable, determine an appropriate action to manage the conflict of interest, as follows:
- (a) cease or avoid: the person involved in the conflict of interest is to cease or avoid involvement in the conduct the subject of the conflict of interest;
 - (b) reduce or mitigate: the person involved in the conflict of interest is to reduce or mitigate the conflict of interest by the placement of restrictions or limitations on their involvement in the conduct the subject of the conflict of interest; and
 - (c) continue or remain: the person involved in the conflict of interest is to continue or remain involved in the subject of the conflict of interest.
- 4.5** In the event that the disclosure of a conflict of interest (including a disclosure of a standing interest) is made by a director or senior executive of QCCT, the Board (excluding the person involved in the conflict of interest and excluding any other conflicted Board member) must, as soon as reasonably practicable, determine an appropriate action to manage the conflict of interest, as follows:
- (a) cease or avoid: the person involved in the conflict of interest is to cease or avoid involvement in the conduct the subject of the conflict of interest;
 - (b) reduce or mitigate: the person involved in the conflict of interest is to reduce or mitigate the conflict of interest by the placement of restrictions or limitations on their involvement in the conduct the subject of the conflict of interest; and
 - (c) continue or remain: the person involved in the conflict of interest is to continue or remain involved in the subject of the conflict of interest.
- 4.6** The Chairperson must record the disclosure of conflict of interests and the actions taken in a Conflicts Register and, as appropriate, the minutes of the Board.
- 4.7** The Chairperson must retain records regarding the disclosure of conflicts of interest and actions taken for at least seven years from the date of its notification in writing by Personnel.
- 4.8** The Board must review the Conflicts Register at each Board meeting and such review must be recorded in the minutes of the Board meeting.

5. Compliance with this Policy

- 5.1** All Personnel must ensure that they read, understand and comply with this Policy.
- 5.2** The prevention, detection and reporting of non-compliance with conflicts of interest obligations in any part of QCCT' business is the responsibility of all those working for it or under its control. All Personnel are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- 5.3** All Personnel must notify a member of the QCCT Executive Committee or a Board member as soon as possible if they believe or suspect that a conflict with this Policy has occurred, or may occur in the future.
- 5.4** All Personnel are encouraged to raise concerns about any issue or suspicion of non-compliance with this Policy at the earliest possible stage.
- 5.5** If any Personnel believe or suspect a breach of this Policy has occurred or that it may occur, they must notify a member of the QCCT Executive Committee or a Board member as soon as possible.

5.6 If any Personnel are unsure about whether a particular act constitutes non-compliance with this Policy, they are to raise it with a member of the QCCT Executive Committee or a Board member.

6. Communication and awareness of this Policy

- 6.1** It is important to QCCT that this Policy is available to all of its stakeholders including beneficiaries of our programs, donors and supporters. QCCT therefore endeavours to ensure that access to this Policy is made as easy as possible.
- 6.2** This Policy is available for download from our website.
- 6.3** QCCT will provide regular training to all Personnel on this Policy. This training will also form part of the induction process for all volunteers.
- 6.4** It is the responsibility of all Personnel to ensure that all relevant stakeholders in Australia and internationally, are informed of the existence and implementation of this Policy in any way they consider to be culturally appropriate.

7. Breaches of this Policy

- 7.1** Any Personnel who breaches this Policy will face disciplinary action.
- 7.2** QCCT may terminate its relationship with other individuals and organisations working on its behalf if they breach this Policy.

8. Policy review

- 8.1** This Policy may be amended at any time by the Board in its absolute discretion.
- 8.2** It is intended this Policy may be reviewed on an annual basis.
- 8.3** Any annual review of this Policy may include collection and review of all relevant documents of QCCT (in Australia and internationally), including board minutes, training materials, reports and other associated documents in respect of this Policy.