



CAMP GAN YISROEL NSW
Chabad Youth NSW
Conflict of Interest Policy

Purpose

The purpose of this policy is to help Chabad Youth staff, volunteers and board members to effectively identify, disclose and manage any actual, potential or perceived conflicts of interest in order to protect the integrity of Chabad Youth and manage risk.

Objective

Chabad Youth aims to ensure that all staff are aware of their obligations to disclose any conflicts of interest they may have, and to comply with this policy to ensure they effectively manage those conflicts of interest as representatives of Chabad Youth.

Scope

This policy applies to the staff of Chabad Youth.

Definition of Conflicts of Interest

A conflict of interest occurs when a person's personal interests conflict with their responsibility to act in the best interests of Chabad Youth. 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). It also includes a conflict between a staff, volunteer or board member's duty to Chabad Youth and another duty they have (for example, to another organisation). 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 Chabad Youth, and must be managed accordingly.

Policy

This policy has been developed because conflicts of interest commonly arise and do not need to present a problem if they are openly and effectively managed. It is the policy of Chabad Youth that ethical, legal, financial or other conflicts of interest be avoided, and that any such conflicts, where they arise, do not conflict with the obligations to Chabad Youth. Chabad Youth will manage conflicts of interest by requiring staff members to:

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

Responsibility of the Director

The Director, Rabbi Elimelech Levy, is responsible for:



- establishing a system for identifying, disclosing and managing conflicts of interest across Chabad Youth
- monitoring compliance with this policy
- reviewing this policy annually to ensure it is operating effectively

The Director must ensure that staff, volunteers and board members are aware of the ACNC governance standards, particularly governance standard 5, and that they disclose any actual or perceived material conflicts of interest as required by governance standard 5.

Identification and Disclosure of Conflicts of Interest

Once an actual, potential or perceived conflict of interest is identified, it must be entered into Chabad Youth's register of interests and raised with the board. Where all other board members share a conflict, the board should refer to governance standard 5 to ensure proper disclosure. The register of interests must be maintained by the Director and record information related to a conflict of interest (including its nature and extent and any steps taken to address it). Any information of conflicts of interest will only be disclosed on a need-to-know basis.

Action Required for Management of Conflicts of Interest

Conflicts of interest of board members

Once the conflict of interest has been appropriately disclosed, the board (excluding the disclosing member and any other conflicted member) must decide whether those conflicted board members should:

- vote on the matter (this is a minimum)
- participate in any debate
- be present in the room during the debate and voting

In exceptional circumstances — such as where a conflict is very significant or likely to prevent a board member from regularly participating in discussions — the board may consider whether it is appropriate for the conflicted person to resign from the board.

What should be considered when deciding what action to take

- whether the conflict needs to be avoided or simply documented
- whether the conflict will realistically impair the disclosing person's capacity to participate impartially in decision-making
- alternative options to avoid the conflict
- Chabad Youth's objects and resources
- the possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of, the charity

The approval of any action requires the agreement of at least a majority of the board (excluding any conflicted members) present and voting at the meeting. The action and result of the voting will be recorded in the minutes and in the register of interests.

Compliance with This Policy

If the board has reason to believe a person subject to this policy has failed to comply, it will investigate the circumstances. If it is found the person failed to disclose a conflict of interest, the board may take action against them, which may include seeking to terminate their relationship



with Chabad Youth. If a person suspects a board member has failed to disclose a conflict of interest, they must discuss it with the person in question.

For questions about this policy, contact the Director, Rabbi Elimelech Levy.

Review

This policy will be reviewed annually. The review will be conducted by management, employees, families and interested parties.

Last reviewed: 1 June 2023

Date for next review: June 2026