



Jord's Conflict of Interest Policy

1. Purpose

The purpose of this policy is to ensure Jord International's (herein after referred to as Jord) employees, contractors, casuals and volunteers effectively identify, disclose and manage any actual, potential or perceived conflicts of interest. This is required in order to protect the integrity of Jord and to manage any associated risks.

2. Objective

Jord's Board aims to ensure that all employees, contractors, casuals and volunteers are aware of their obligations 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 Jord.

3. Scope

This policy shall apply to all people who work within or for Jord in any form including supplier based commercial activities, such as procurement, supplier registration and accounts.

4. Definition of conflicts of interests

A conflict of interest occurs when a person's personal interests conflicts with their responsibility to act in the best interests of Jord. 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). 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 Jord and must be managed accordingly.

5. Policy

This policy has been developed because conflicts of interest do arise from time to time, and need not present a problem to Jord if they are openly and effectively managed. It is the policy of Jord as well the responsibility of the CEO, that ethical, legal, financial or other conflicts of interest be avoided and that any such conflicts (where they do arise) do not conflict with obligations to Jord.

Jord will manage conflicts of interest by requiring all employees, contractors, casuals and volunteers to:

- avoid conflicts of interest where possible
- identify and disclose any conflicts of interest, so they can be carefully managed in consultation with Jord management
- follow this policy and respond to any breaches

5.1 Responsibility of the CEO

The CEO shall be responsible for:

- Managing conflicts of interest across Jord
- monitoring compliance with this policy in conjunction with People and Culture (P&C) and the CFO
- reviewing this policy as required to ensure that the policy is operating effectively

5.2 Identification and disclosure of conflicts of interest

Once an actual, potential or perceived conflict of interest is identified, it must be raised with the CEO or CFO. Information disclosed, shall be restricted to the Board, the CEO, the CFO and P&C.



6. Action required for management of conflicts of interest

Once the conflict of interest has been appropriately disclosed, the CEO will:

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

7. Compliance with this policy

If it is determined that a person subject to the policy has failed to comply with it, Jord will investigate the circumstances. If it is found that this person has failed to disclose a conflict of interest, Jord may take action against them. This may include seeking to terminate the relationship with Jord or any other action as permissible under law.