

CONFLICT OF INTEREST POLICY

RIMPA GLOBAL

RECORDS AND INFORMATION MANAGEMENT
PRACTITIONERS ALLIANCE

Advancing and Connecting the Records and Information
Management Profession.

Contents

1	Document Control	3
2	Related Policies, Procedures or Documents	3
3	Amendment, Modification or Variation	3
4	Purpose	4
5	Objective	4
6	Scope	4
7	Definitions	4
8	Policy Statement	5
8.1	Responsibilities	5
8.2	Identification and Disclosure of Conflicts of Interest	5
8.3	Board Assessment of Conflict of Interest	6
8.4	Courses of Action for Addressing Conflicts of Interest	6
8.5	Confidentiality of Disclosures	7
8.6	Compliance with this Policy	7
9	Interest Declaration Scenarios and Examples	8

1 Document Control

VERSION	DATE	AUTHORS	APPROVAL	COMMENTS
1.0	20 February 2021	Janine Morris		
2.0	12 January 2023	Anne Cornish		
3.0	23 May 2024	Anne Cornish Jo Kane		
3.1	25 September 2025	Governance & Risk Committee		Review
3.2	10 October 2025	Governance & Risk Committee		Include Board Elect members in the Policy
4.0	27 October 2025	Board Secretariat	RIMPA Global Board	Amendments as per meeting 156.

2 Related Polices, Procedures or Documents

NUMBER	DOCUMENT NAME	INTERNAL OR EXTERNAL
1.0	Complaints and Grievance Policy	External
2.0	Interest Register	Internal

3 Amendment, Modification or Variation

This Conflict of Interest Policy is effective from 20 February 2021 and is reviewed every two years.

This Conflict of Interest Policy may be amended, varied, or modified by the Records and Information Management Practitioners Alliance Global (RIMPA Global) Board.

4 Purpose

This policy ensures that RIMPA Global representatives (including employees, Board Directors, Board-Elect Directors, Ambassadors, and other volunteers) identify, disclose and manage actual, perceived, or potential conflicts of interest to protect the integrity and transparency in decision-making of RIMPA Global.

This policy adheres to the requirements set forth by section 191 of the *Corporations Act 2001* (Cth), which mandates Board Directors must, as soon as practical, disclose to the other Board Directors any material personal interest in matters relating to the affairs of RIMPA Global.

5 Objective

To ensure all RIMPA Global representatives understand their obligation to disclose conflicts of interest and manage them effectively to prioritise the organisation's interests.

6 Scope

This policy applies to RIMPA Global employees, Board Directors, Board-Elect Directors, Ambassadors, and volunteers, (collectively referred to as “representatives”).

7 Definitions

Actual Conflict of Interest: Occurs when an individual's personal interests, relationships, or activities may directly influence or interfere with their professional duties, decisions, or obligations, leading to biased or compromised judgment.

Board Director: A member of the RIMPA Global Board with responsibilities for disclosing and addressing conflict of interest set out in the Corporations Act 2001 (Cth).

Board-Elect Director: An individual who has been duly elected to the Board of Directors but has not yet commenced their formal term of office.

Interest Register: a formal record, maintained by the CEO, where RIMPA Global representatives document actual, potential, or perceived conflicts of interest to ensure transparency, manage risks, and maintain organisational integrity.

Perceived Conflict of Interest: Exists when it appears to others that an individual's personal interests or relationships could influence their professional decisions, even if no actual influence or bias occurs, potentially undermining trust or credibility.

Potential Conflict of Interest: Exists when an individual's personal interests could affect their work decisions in the future, even if no actual influence or bias has yet occurred.

Representatives: employees, Board Directors, Ambassadors, and other volunteers associated with RIMPA Global.

Vendor: Any individual, organisation, or group that supplies, markets, or promotes commercial products or services to the records and information management (IM) profession **and has engaged RIMPA Global to promote or market those services within the past three (3) years.**

8 Policy Statement

RIMPA Global requires all representatives to identify and acknowledge ethical, legal, financial, or other conflicts of interest. When conflicts arise, they must be disclosed and managed to ensure they do not interfere with duties undertaken for RIMPA Global. Representatives must:

- Identify, disclose, and document any conflicts promptly
- Take action to address conflicts of interest as soon as possible
- Adhere to conflict management actions as directed by the Board
- Report any breaches of this policy.

8.1 Responsibilities

Board Responsibilities:

- Establish a system to identify, disclose, document and address conflicts of interest
- Determine management strategies for conflicts
- Maintain and review the Interest Register
- Monitor compliance with this policy.

Representatives' Responsibilities:

- Declare, document and address conflicts of interest promptly
- Follow Board guidance to manage conflicts.

8.2 Identification and Disclosure of Conflicts of Interest

At the commencement of every meeting involving RIMPA Global representatives, the Chair must provide an explicit opportunity for all attendees to declare any actual, potential, or perceived conflicts of interest. Should a conflict become apparent during a meeting, it must be declared immediately to the Chair as soon as it is identified.

Outside of formal meetings, representatives may disclose a conflict of interest at any time by promptly contacting the CEO at admin@rimpa.com.au.

All disclosed conflicts, whether in or outside meetings, must be recorded in the Interest Register, in accordance with the following sections of this policy.

- Section 8.4 Courses of action for addressing conflict of interest; and
- Section 9 Interest declaration scenarios and examples.

including the nature, scope, and any actions taken to address the matter. Declarations made during meetings should also be documented in the minutes.

8.3 Board Assessment of Conflict of Interest

The Board will periodically review the Interest Register and confirm if the action taken to manage the conflict is adequate or additional action is required. After deliberation, a record must be kept of key discussion points, outcomes, and future actions.

The RIMPA Global Board will consider if the conflict:

- Meets the criteria of an actual, perceived, or potential conflict of interest
- Has been adequately documented in the Interest Register
- Impairs the discloser's capacity to act impartially
- Creates an appearance of improper conduct that might impair confidence in, or the reputation of RIMPA Global.

Any additional actions should be documented in the Interest Register. The Discloser should be notified immediately of the outcome of the Board's decision and any additional management requirements.

For Board Directors disclosing a conflict in a Board meeting, actions taken in response to an actual, perceived, or potential conflict of interest must be approved by a majority of the Board, excluding the conflicted discloser. The action is recorded in the Interest Register and the minutes of the meeting.

8.4 Courses of Action for Addressing Conflicts of Interest

To manage reportable conflicts of interest, RIMPA Global will implement the following actions as appropriate:

- **Disclosure and Documentation:** Representatives must disclose all conflicts of interest, and these will be recorded in the Interest Register with details of the conflict, the representative involved, and the date of disclosure.
- **Recusal or Abstention:** Representatives with an actual conflict will refrain from participating in discussions, decisions, or actions related to the matter, including voting, to ensure impartiality. This is a requirement for Board Directors in accordance with the Corporations Act 2001 (Cth)
- **Reassignment of Duties:** Responsibilities may be reassigned to another individual to avoid influence over decisions related to the conflict.
- **Management Plan:** A formal plan may be developed to mitigate the conflict, including oversight, additional approvals, or restrictions on the representative's involvement.
- **Divestment or Removal of Interest:** Representatives may be required to eliminate the conflicting interest, such as divesting financial stakes or resigning from external roles.
- **Independent Oversight or Review:** An independent party, such as a compliance officer or external auditor, may review the conflict and related decisions to ensure fairness and compliance.
- **Disciplinary Action:** Failure to disclose or manage a conflict may result in disciplinary measures, such as warnings, suspension, or termination of association with RIMPA Global.

9 Interest Declaration Scenarios and Examples

SCENARIO	EXPLANATION	MITIGATION
Ownership Interests	Representatives must declare any ownership or financial interests in companies that may be considered competitors, customers, or suppliers to RIMPA Global. This includes investments in companies that might benefit from the decisions made by the Board.	Declare the interest and the representative is to recuse themselves from any discussions or votes that may benefit them.
Family and Personal Relationships	Any familial or close personal relationships with employees, consultants, or vendors associated with the company should be disclosed. This includes relationships that might influence, or appear to influence, a representative's objectivity and decisions.	Declare the interest for the Board to discuss the nature of the interest and how it should be handled.
Representative's Spouse Works for a Vendor	A representative's spouse works as a consultant for a vendor that RIMPA Global is considering as a potential sponsor or industry partner for an upcoming event. The spouse's role at the vendor could result in the vendor receiving favourable treatment or opportunities due to the representative's influence, even if other vendors or sponsors might be more suitable for the event.	The representative should declare this familial relationship. The Board would recognise that this is an actual conflict of interest. The representative will recuse themselves from any discussions or decisions related to selecting sponsors or industry partners to ensure the process remains unbiased.
Other Directorships	Holding positions on other Boards, especially if those organisations have a potential business relationship with the company or are in the same industry, could lead to interests that need to be disclosed.	Declare the interest and the representative is to recuse themselves from any discussions or votes that may lead to information being disclosed.
Financial Interests in Transactions	If a representative stands to personally benefit from a transaction the company is considering, such as mergers, acquisitions, or contracts.	Declare the interest and the representative is to recuse themselves from any discussions or votes that may benefit them.

SCENARIO	EXPLANATION	MITIGATION
Receiving Personal Benefits	Any situation where a representative receives personal benefits from third parties due to their position within the company should be disclosed. This includes gifts, discounts, hospitality, and other benefits that might affect their judgement.	Declare the interest for the Board to discuss the nature of the interest and how it should be handled.
Discounts from Suppliers	A representative receives a significant discount on personal purchases from a supplier that also provides services to RIMPA Global. This personal benefit could influence the representative's decisions regarding contract renewals or evaluations of the supplier's performance.	The representative must declare this benefit. The Board will recognise that this is an actual conflict and require the representative to recuse themselves from any discussions or decisions involving the supplier to maintain impartiality.
Invitations to Exclusive Events	A staff member receives regular invitations to exclusive events (such as concerts or sports matches) from a vendor to secure a contract with RIMPA Global. These benefits might unduly influence the staff member's recommendations regarding the vendor.	The staff member should disclose these invitations. The Board would then decide how to handle the situation, potentially involving the staff member stepping away from any involvement in the vendor selection process.
Offer of Employment	While undertaking RIMPA Global business, such as running a training workshop, a representative is approached and offered an opportunity to sell similar services directly to another organisation.	The representative must declare the approach. The Board will determine if this conflicts directly with RIMPA Global business or if it is appropriate for the representative to accept the opportunity.
Consulting or Employment	Representatives who have consulting, advisory, or employment agreements with other businesses that might have an involvement in the operations of the company should disclose these relationships.	Declare the interest and the representative is to recuse themselves from any discussions or votes that may benefit them.

SCENARIO	EXPLANATION	MITIGATION
Representative also Employed as a Consultant	A representative of RIMPA Global is also employed as a consultant for a company that supplies key technology services to RIMPA Global. This dual role could create a conflict of interest, as the representative might favour decisions that benefit the consulting company, even if those decisions are not in the best interest of RIMPA Global.	The representative should declare this consulting relationship. The Board would then discuss the nature and extent of the potential conflict of interest. They might decide that the representative should recuse themselves from any discussions or votes related to the technology services provided by the consulting company. Additionally, the Board could review and monitor the representative's involvement to ensure that no undue influence is exerted on decisions involving the consulting company.
Legal and Ethical Issues	Any legal or ethical issues that might affect a representative's ability to perform their duties, or that could bring disrepute to the company.	Declare the interest for the Board to discuss the nature of the interest and how it should be handled.
Legal Dispute	A representative of RIMPA Global is currently involved in a legal dispute over unethical business practices in a separate company they manage. This ongoing legal issue could potentially tarnish the reputation of RIMPA Global if it becomes public knowledge.	The representative should declare this legal issue. The Board would then discuss the implications of this conflict and determine the best approach to manage the situation. This might involve the representative stepping down temporarily or permanently from their role until the legal matter is resolved. Additionally, if a representative has a known bias against a particular vendor or member or has previously managed an employee who has submitted a grievance, they should not be involved in related discussions to maintain impartiality.

SCENARIO	EXPLANATION	MITIGATION
Personal Relationship with a Vendor	<p>A Board Director has a long-standing personal friendship with a vendor. This relationship could lead to a biased judgement in favour of the vendor during contract negotiations, regardless of whether the vendor's proposal is the most beneficial for the company.</p> <p>Family members: Such as a spouse, partner, children, parents, siblings, or extended relatives (e.g., cousins, in-laws).</p> <p>Close friends: Individuals with whom you have a strong personal bond that could affect impartiality.</p> <p>Romantic partners: Current or former partners, whether married, cohabiting, or dating.</p> <p>Business associates: Individuals with whom you share financial or professional interests outside the organisation (e.g., co-owners of a business).</p> <p>Other significant connections: Any person with whom you have a relationship that could be seen as influencing your objectivity (e.g., a mentor, mentee, or someone you owe a significant personal favour).</p>	<p>The Board Director must disclose this relationship to the Board. The Board would discuss the potential conflict of interest and decide that the Board Director should abstain from participating in any discussions or decisions related to the vendor to ensure objective and fair judgement.</p>
	<p>Known Issue with a Vendor</p> <p>A Board Director has a known history of conflict with a particular vendor that RIMPA Global is currently considering for a major contract. This ongoing issue could bias the Board Director's opinions and decisions regarding the vendor, potentially leading to unfair treatment.</p>	<p>The Board Director should disclose their past conflicts with the vendor to the Board. The Board Director should recuse themselves from any discussions or decisions related to that vendor. This ensures that the vendor is evaluated objectively based on their merits and the needs of the company.</p>

SCENARIO	EXPLANATION	MITIGATION
Managing a Grievance Involving Relationships with Board Directors	A Board Director has a close personal relationship with another Board Director who is involved in a grievance process. The grievance was submitted by an employee against this second Board Director, alleging misconduct. Due to the close personal relationship, the first Board Director's judgement and impartiality could be compromised when dealing with the grievance.	The Board Director should declare their close personal relationship with the Board Director who is the subject of the grievance to the Board. The Board would then discuss the potential bias and decide that the Board Director should not be involved in the grievance process. An independent committee or an external investigator should be appointed to handle the grievance to ensure an unbiased and fair resolution. This approach maintains the integrity of the grievance process and ensures that all parties are treated fairly.
Managing a Grievance Involving a Board Director and a Staff Member	A Board Director has a close personal friendship with a staff member who has submitted a grievance against another employee in the company. The staff member's grievance alleges unfair treatment and bias by their manager. Given the personal relationship between the Board Director and the staff member, there is a risk that the Board Director's involvement in the grievance process could be influenced by their friendship, leading to a biased resolution.	The Board Director should declare their personal relationship with the staff member to the Board. The Board would then discuss the potential conflict of interest and decide that the Board Director should recuse themselves from any involvement in the grievance process. To ensure the grievance is handled impartially, the Board could appoint an independent committee or an external mediator to oversee the grievance proceedings and make recommendations based on an unbiased assessment of the situation. This ensures that the grievance is resolved fairly and transparently, maintaining trust and integrity within the organisation.