

PURPOSE

As a company, BrewHub has been built on a foundation of positive and effective relationships in all parts of our community; with our employees (our “BrewHubbers”), with our clients, and with our long term partners and suppliers. We seek outcomes where everyone can feel a ‘win’, so we have sustainable relationships.

To ensure we operate BrewHub in a fair and unbiased manner, we must beware of where these relationships may have a conflict of interest. Conflicts of interests occur in all businesses. The important thing is to make sure we know how to identify them, have a way to declare them, and manage them to mitigate any risks they may cause.

This policy explains how BrewHub will go about managing Conflicts of Interests that exist in our community.

SCOPE

This policy applies to all BrewHubbers, including employees, directors, and authorised representatives such as contractors, consultants and any individuals or groups undertaking activity for or on behalf of BrewHub.

DEFINITION & BACKGROUND

A conflict of interest (COI) is when a BrewHubber (or their immediate family member) has a relationship or personal interest that may conflict with the professional interests of BrewHub. Where a COI exists, it may compromise the BrewHubbers judgement, decisions, or actions in performing their role at BrewHub. Even the perception of a conflict can cause harm to BrewHub’s business reputation if it isn’t declared and managed in an appropriate way.

Typical COIs include:

- Personal relationship (or their immediate family member’s relationship) with an employee, client, or supplier
- Another employer or business interest
- Clubs or other professional memberships
- Investments or shares, real estate, assets, trusts

We have many COIs at BrewHub, especially with our successful [Employee Referral Program](#). We have examples of parents/child, siblings, spouses, former colleagues, former suppliers, partner’s cousins, and many friends and acquaintances from the communities we live and work within. All of them, however, exist in positions and teams where they will cause the least or no harm. i.e. they aren’t in a managerial position where they control or influence the other’s pay and outcomes at work. For friendships, it’s a little different as the relationship is less likely to influence household/personal outcomes and the parties take on the biggest risk of their friendship success.

As the business grows, it becomes easier to manage around COIs as there will be multiple teams and managers so the relationship can be worked around. Having said that, in the case there is only one possible solution (such as only one of a particular role and what team that’s in), the COI will need to be reviewed and approved to exist.

PROCESS TO DECLARE A COI

BrewHub management are responsible for monitoring and mitigating any COIs that exist within the business.

BrewHub engage Stoplinc to provide an external web-based management tool to capture declarations of COI and report on any issues. BrewHubbers must make their declaration as soon as it is known, if it changes or becomes a bigger issue, or if they’re uncertain how to proceed via Stoplinc: <https://brewhub.stoplincereport.com/>

The COI declaration will include:

- **Date** when COI arose, such as new employee or new supplier agreement
- **Type** of COI
 - Personal relationship
 - Another employer or business interest
 - Club or professional membership
 - Investments or shares
- **Description** of the COI
 - Personal relationship: nature of it (friend/relative type), length of relationship, closeness, financial connection, living arrangements
 - Another employer or business interest: relativeness to BrewHub industry, impact to working hours or conditions
 - Club or professional membership: relativeness to BrewHub industry, ownership, competitors
 - Investments or shares: relativeness to BrewHub industry, ownership, competitors
- **How** the relationship is a conflict at BrewHub
 - Authority & decision making
 - Impartiality
 - Pay or payment terms
- Identify potential **risks**
 - Financial
 - Bias
 - Perception from others (eg. favouritism for shifts etc)
- **Plans** to mitigate the risk to BrewHub and themselves
 - How the COI parties propose to manage around it
 - What actions will be taken if the relationship does become an issue

REVIEWING A COI

Stopleveline will provide BrewHub management a regular report of any declared COIs for review. BrewHub management will review the plans to mitigate the risks and determine if they are sufficient. If they believe alternate arrangements need to be made, they will work directly with the parties involved and appropriate line management to implement.

The framework for managing the COI is as follows:

Register the COI via Stopleveline

Restrict the COI parties' involvement in business activities such as critical decisions

Recruit a third parties, such as another manager, to oversee their responsibilities

Remove the COI parties from impacted business activities, such as projects, team operations

Relinquish any private interest, if the COI parties would prefer that, than to alter their BrewHub responsibilities

Resign if the COI parties prefer this course of action

If there are any concerns with how the COI is managed, BrewHub encourages them to be raised with the responsible manager/s or report it, anonymously if preferred, via Stopleveline: <https://brewhub.stoplinereport.com/>

MANAGING ONGOING

Over time, it's possible that the COI becomes difficult to manage. For example, someone changes roles, or the relationship itself changes. Whilst the business will know about the relationship, it is the prime responsibility of those with the COI to monitor its effect on the workplace and if it poses any risk.



If it does change, steps to take are:

- COI raise it with their manager so they can address the impact together
- If the manager is involved, raise it with the manager's manager or senior manager
- Declare it with Stopline
- Consider ceasing the relationship relative to BrewHub

Possible avenues of mitigating the risk will be:

- Change of role at BrewHub
- Change of reporting relationship within BrewHub
- Separate day to day operational and people management responsibilities, such as pay and performance decisions to be conducted by another manager
- Change of client, supplier, partner management responsibilities
- Potentially eliminating the COI by removing the relationship such as one person resigning or BrewHub ending the professional relationship with external parties

RESPONSIBILITIES

All BrewHubbers – adhere to this policy and be aware of your obligation to avoid COIs where possible, declare any COIs, and raise any concerns or questions with their manager.

Manager – ensure all BrewHubbers are adequately informed of this policy, monitor the COIs that exist within their team, and mitigate any foreseen risks.

Senior management – monitor COIs within their department, participate in or chair compliance committee reviews when required.

Director(s) – ensure appropriate business management in all parts of BrewHub, including in managing our relationships with clients, suppliers, partnerships, and community members.

Whistleblowing – BrewHub encourages its employees, suppliers, and clients, to speak up when they observe suspected suspicious behaviour from BrewHub. BrewHub does not tolerate any form of retaliation, harassment, or intimidation of any individual as a result of reporting or declaring matters. If there are any concerns, BrewHubbers are encouraged to report them, anonymously if preferred, via Stopline: <https://brewhub.stoplينerreport.com/>

Stopline - external company specialising in providing integrity/whistleblowing services. BrewHub engage Stopline to provide an ongoing service to enable employees, contractors, and stakeholders to report in good faith suspected concerns about BrewHub and its operations such as series workplace issues.

Failure to adhere to this policy and/or monitor the compliance with it, may result in disciplinary action including termination of employment.

End of Document _____

POLICY DETAILS

Policy number: 1.7	Date published: September 2024
Policy version: 1.0	Last known policy version: 2.6 Anti-Corruption Policy
Policy Approved by: David Scott, <i>Managing Director</i>	Approval Signature: