



CONFLICT OF INTEREST POLICY

Purpose

This policy outlines the principles applying to the declaration and management of actual, potential and perceived conflicts of interest.

Scope

The policy applies to all AIB Staff and directors, and external appointees of boards and committees, whether they are persons or corporate bodies (collectively, “AIB Staff” for the purpose of this policy).

Definitions

Unless otherwise defined in this document, all capitalised terms are defined in the [glossary](#).

Policy

1. All AIB Staff have a responsibility to work in the best interests of the organisation and avoid situations and actions that may be, or create the perception or appearance of being, in conflict with the organisation’s overall interests, objectives and principles.
2. Activities that have the potential to cause a conflict of interest (or the perception or appearance of a conflict of interest) include, but are not limited to:
 - 2.1. holding a substantial financial interest in any organisation (e.g. suppliers, customers) that has dealings with AIB;
 - 2.2. the acceptance by AIB Staff from any party or supplier of goods and/or services, either directly or indirectly, of cash payments, goods, services, loans (except from banks or other financial institutions), or discounts that are not generally available to all AIB Staff;
 - 2.3. the acceptance by AIB Staff, either directly or indirectly, of any gifts, gratuities or services in kind from any party that is involved, or is attempting to be involved with AIB;
 - 2.4. the ownership by AIB Staff or a respective member of their family, in any proportion, of land and/or other assets, either directly or indirectly, that is the subject, or potential subject, of business dealings with AIB;
 - 2.5. engaging in nepotism, by the offer of employment to a member of a AIB Staff’s family, especially where the family member would be involved in a direct reporting relationship. Where there is a direct reporting relationship, the CEO’s prior written approval to appoint the family member must be obtained;

- 2.6. a personal relationship with another member of AIB Staff, including familial, sexual or financial, where there is a potential for, or a perception that, a conflict of interest could exist, where there is a possibility that a decision may be biased in favour of or against, a person with whom there is a personal relationship or where one or both parties hold supervisory or management level positions within the business;
- 2.7. membership in a governing or advisory body of another Higher Education Provider
- 2.8. engaging in outside employment (including self-employment or carrying on a business) where such employment will, or has the potential to:
 - (a) impact on the AIB Staff's ability to perform their normal functions;
 - (b) create a conflict of interest; and/or
 - (c) compromise the confidentiality of the organisation; and
 - (d) compromise the confidentiality of any dealings involving AIB Staff.
3. Problems arising out of these situations can usually be avoided by AIB Staff:
 - 3.1. conducting any business on behalf of AIB in an ethical, honest and transparent manner;
 - 3.2. disclosing these situations, prior to them arising where practical, in writing to:
 - (a) their respective line manager, and either
 - (i) the Chair of the respective AIB governing body, where the AIB Staff member is a member of that body, or
 - (ii) the CEO for all other disclosure types.
 - 3.3. Disclosures will be maintained on a centralised Conflict of Interest Register as maintained by the HR Department.
4. Written approval must be obtained as per 3.2 to engage in outside employment or for the appointment of family members under this policy.
5. Any gifts, prizes, or rewards (including goods and/or services) that are received by AIB Staff (or their associate) as a reward for performing their normal duties must be declared, even if they have been received with the full knowledge and permission of AIB, as Fringe Benefits Tax (FBT) will most likely apply to the value of the reward received and be payable by AIB.
6. In addition, most gifts, rewards and the like are classified by the tax legislation as "reportable fringe benefit amounts". Any amount that is classified as a reportable fringe benefit amount will normally be required to be shown on the Payment Summary of the AIB Staff receiving the benefit, subjecting them to personal taxation issues. Some fringe benefits are classified as "excluded benefits" and are not required to be shown on Staff Payment Summaries.

Support Contact Information:

Should you have any questions regarding this policy, please contact Human Resources.

Related Policies and Procedures:

[Conflict of Interest Procedure](#)

Intellectual Property Policy and Procedure

Privacy Policy and Procedure
Reviews Policy and Procedure
Staff Grievance Policy and Procedure
Staff Code of Conduct
Whistleblower Policy and Procedure

Responsibility:

Chief Executive Officer

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