



Conflict of Interest and Insider Trading Policy

INTEGRITY AND RISK

V1.0 | November 2025

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1. PURPOSE

This Policy, related Procedure and Guide assist the Queensland Building and Construction Commission (QBCC officers¹) to understand and comply with their legal and employment obligations in relation to Conflicts of Interest (COIs) and Insider Trading.

An actual, perceived or potential COI may arise when the QBCC officers personal interests interfere with or appear to interfere with their official duties and responsibilities.

The QBCC receives confidential and potentially valuable information about private entities in the course of administering and enforcing the [Queensland Building and Construction Commission Act 1991](#) (QBCC Act) and other legislation. The QBCC is committed to ensuring that its QBCC officers' handle information lawfully and appropriately in their dealings and do not misuse and are not placed under suspicion of this information.

Accordingly, this policy provides requirements including:

- disclosure of QBCC officers' relevant personal interests
- the management and monitoring of all actual, potential or perceived COIs of the QBCC officers
- a strict prohibition on the QBCC officers using inside information to trade, or communicating inside information to others who will or are likely to, trade in securities of a listed entity based on inside information; and
- the expectation that QBCC officers uphold the highest standards of integrity, comply with all relevant laws, regulations, internal policies, and safeguard the confidentiality of any sensitive or confidential information entrusted to them.

This Policy must be read in conjunction with the Conflict of Interest and Insider Trading Procedure, and the Conflict of Interest and Insider Trading Guide.

2. SCOPE

This Policy and the related Procedure and Guide apply to all QBCC officers, who must take reasonable and proactive measures to identify and manage any COI.

For the purposes of this Policy the following individuals are collectively referred to as 'QBCC officers':

- The Commissioner/Chief Executive Officer (Commissioner), Statutory Office Holders, Senior Executive Service (SES) or equivalent officers and employees of the Queensland Building and Construction Employing Office (QBCEO) who undertake work for the QBCC
- Members of the Service Trades Council (STC) and its panels, the Service Trades Licensing Advisory Panel (STLAP) and the Notifiable Work Panel (NWP)
- Individuals who are engaged as contractors, consultants or service providers that provide services to the QBCC.

Application to the QBC board

Members of the Queensland Building and Construction Board (QBC Board) and the QBC Board Committees are subject to the accountabilities and responsibilities of this Policy. For this purpose, they are considered within the scope of 'QBCC officers'. However, procedural requirements relating to the declaration, management and monitoring of declarations of interest and COIs for the QBC Board and QBC Board Committee members are detailed in the QBC Board Charter.

Out of scope

Trading in securities using information that is generally and/or publicly available is excluded from the scope of this Policy.

¹ Refer to section 2 for the individuals collectively referred to as 'QBCC officers'.

3. AUTHORITY

This Policy and the related Procedure are established in accordance with sections 87, 88, and 89 of the [Public Sector Act 2022](#) (PS Act). The QBCC officers also have an obligation to act in the public interest at all times and to identify, disclose and appropriately manage COI under the [Code of Conduct for the Queensland Public Service](#) (Code of Conduct).

In addition, particular officers have specific legislative obligations, including those set out in:

- Section 20M of the QBCC Act which requires the Commissioner to declare certain interests to the QBC Board
- Section 20C of the QBCC Act which requires QBC Board members to declare certain interests to the QBC Board
- Section 132 of the [Plumbing and Drainage Act 2018](#), which sets out disclosure and conflict of interest management obligations on members of the STC, STLAP and NWP
- The [Integrity Act 2009](#) (Integrity Act) applies to the QBCC and QBCEO as a 'government entity.'² Section 40F requires prescribed Statutory Office Holders³ to disclose conflicts of interest to the relevant Minister. For QBCC, Statutory Office Holders for this purpose are members of the QBC Board, the Executive Officer of the Employing Office, and the Adjudication Registrar appointed by the Governor in Council.⁴
- The Public Sector Commission's [Directive 03/24 – Declaration of interests – public sector employees excluding chief executives](#) and [Declaration of Interests policy – Senior Executive Service and Equivalent Employees including Statutory Office Holders](#) (for details refer to Conflict of Interest and Insider Trading Guide – Appendix 6 – SES Declarations).

This Policy has been prepared to reflect the above legislative and Queensland Government policy obligations.

This Policy and its related Procedure and Guide are compatible with the human rights protected by the [Human Rights Act 2019](#) and any limitation on a QBCC officer's human rights is reasonable and justifiable because of the broader public interest in ensuring that conflicts of interest are appropriately managed by public sector officers in line with legislated standards.

4. POLICY STATEMENT AND PRINCIPLES

4.1 Policy statement

The QBCC and its officers are entrusted by the Queensland Government and the community to undertake important work on their behalf. With this trust comes a high level of responsibility, which must be matched by the highest standards of ethical and professional behaviour from all QBCC officers.

The public is entitled to have confidence in the integrity of public officers and trust that their functions are carried out in the public interest. This Policy supports expectations reflected in legislation, including the QBCC Act, PS Act <https://www.legislation.qld.gov.au/view/html/inforce/current/act-1994-067> and the [Code of Conduct](#).

The QBCC officers are responsible for meeting the requirements applicable to their role in relation to disclosing any interest that does, or could in the future, influence or be perceived to influence the performance of their functions and duties; and actively participate in developing and implementing strategies to resolve or manage any conflict of interest in the public interest.

The QBCC officers must not use their official position or role, influence, or authority to obtain any personal benefits or preferential advantage.

² Section 276(1)(b) Integrity Act.

³ As referenced in the definitions for the Integrity Act, these are statutory office holders described under s140(2) *Public Sector Act 2022*, i.e. appointed under an Act only by the Governor in Council or a Minister.

⁴ As appointed under s150(2) *Building Industry Fairness (Security of Payment) Act 2017*, but not for an Acting Adjudication Registrar appointed by the Commissioner under s150(4).

4.1.1 Conflicts of Interests

COIs will inevitably arise and cannot always be avoided. However, COIs can always be managed or resolved in the public interest if appropriately identified and declared.

All QBCC officers are expected to take reasonable and active steps to identify and manage any COI, actual, perceived or potential, in connection with their employment or involvement with the QBCC in favour of the public interest.

For most QBCC officers, as public sector employees, this requirement is defined under the PS Act.

If they have an interest that conflicts or may conflict with the discharge of their duties, they must disclose the nature of the interest and conflict to the QBCC as soon as practicable after the relevant facts come to their knowledge. They must not take action or further action that is, or may be, affected by the conflict unless authorised by the relevant QBCC delegate.

The QBCC delegate may direct the QBCC officer to resolve a conflict or possible conflict between their personal interest and their duties.

QBCC Officers under statutory appointment arrangements should refer to the definition set out in the sections above under 'authority'.

4.1.2 Declarations of Interests

Officers in Senior Executive Service or equivalent roles and the Commissioner are required to provide a declaration of their interests (including those of their partner and/or dependents), that may have a bearing, or be perceived to have a bearing, on their ability to discharge the duties of their office properly and impartially.

The Commissioner may direct other QBCC officers who are public sector employees to provide a declaration of their interests.

4.1.3 Insider Trading

QBCC officers who possess inside information relating to the QBCC, or a Listed Entity which is a customer, supplier, or business partner, or regulated by the QBCC must not:

- apply for, acquire, or trade, or dispose of a listed entity's securities or financial products, or agree to do so
- permit, procure, encourage or induce another person (e.g., a family member or friend, self-managed superannuation fund, company or family trust) to do any of those things; or
- directly or indirectly communicate the inside information to any other person, if the individual knows (or ought reasonably to know) that the other person may use the information to trade (or advise, procure or encourage someone else to trade) in a listed entity's securities or financial products.

The purpose or motive for Trading, or whether a profit is made from the Trade, is not relevant.

Under section 1043A of the [Corporations Act 2001](#) (Cth), it is illegal for a person to deal in any securities or other financial products when in possession of inside information. A breach of the law relating to insider trading can have serious consequences, including individual criminal and civil liability.

Any person who possesses inside information at any time must not trade in listed securities or financial products, related to that information. The responsibility to ensure compliance with insider trading laws rests with the QBCC officer individually, as such you should exercise care and judgement in deciding whether to trade in securities.

The QBCC will limit, as far as practicably and reasonably possible, access to commercially sensitive information to those employees that need the information to perform their official duties.

The QBCC officers must:

- only use inside information in accordance with their duties, and not use it for personal gain, or induce/facilitate others to use it for their personal gain; and
- declare any commercial interest in companies regulated by the QBCC, and implement an approved management plan, which may include divestment and/or redeployment.

4.2 Principles

These principles contain the ethical values prescribed in the [PSE Act](#) and the [Code of Conduct](#).

PRINCIPLE	WHAT THIS MEANS FOR THE QBCC
1. Integrity and impartiality	<ul style="list-style-type: none"> • The QBCC officers must identify and declare an interest that could influence, or be seen as influencing, the performance of their duties • COI issues must be resolved or appropriately managed in favour of the public interest • The QBCC officers must demonstrate a high standard of workplace behaviour and personal conduct • The QBCC officers must provide advice, make decisions, and act in ways which are objective, independent, and impartial.
2. Promoting the public good	<ul style="list-style-type: none"> • The QBCC officers must act ethically and use public resources to develop and deliver services to the community on behalf of government.
3. Commitment to the system of government	<ul style="list-style-type: none"> • The QBCC officers are aware of their obligations and are committed to the highest standards of integrity and conduct at every level • The QBCC officers accept and value their duty to uphold the system of government and the law • The QBCC is committed to effecting official public sector priorities, policies, and decisions professionally and impartially.
4. Accountability and transparency	<ul style="list-style-type: none"> • The QBCC provides a clear and realistic description of what circumstances and relationships are likely to lead to COI for those in the QBCC and the public sector • The QBCC officers will use public resources in an effective and accountable way • The QBCC officers know what is required of them in relation to identifying and declaring COIs • The QBCC officers have access to relevant and effective strategies to manage COI appropriately • The QBCC implements procedures to facilitate employees disclosing their interests and manage COI in a transparent manner • The QBCC takes appropriate disciplinary action to address any breach of COI requirements • The QBCC officers make and maintain records of COI identification, declaration, and management • The QBCC officers make transparent, ethical, and impartial decisions.

5. RELATED PROCEDURE AND GUIDE

This Policy must be read in conjunction with the Conflict of Interest and Insider Trading Procedure and the Guide which includes the following appendices:

DOCUMENT(S)	DESCRIPTION
PROCEDURE	
Procedure	Detailed process to manage COIs and Insider Trading
GUIDE	
Appendix 1	Definitions
Appendix 2	Roles and Responsibilities
Appendix 3	Managing High Risk Areas for Conflict of Interest including Insider Trading
Appendix 4	Conflict of Interest Management Strategies
Appendix 5	Conflicts of Interest and Insider Trading in the Regulatory Context
Appendix 6	SES Declarations
Appendix 7	Relevant Publications.

6. CONTACT

To seek advice or report suspected misconduct, please contact the Ethics, Standards and Complaints unit at integrity@qbcc.qld.gov.au.

7. DOCUMENT INFORMATION

INFORMATION CATEGORY	DESCRIPTION
Title	Conflict of Interest and Insider Trading Policy
Purpose	This Policy is designed to assist the QBCC officers to understand and comply with their legal and employment obligations regarding Conflict of Interest (COI) and Insider Trading.
Document Type	Policy
Category	Governance
Sub-category	Ethics, Standards and Complaints
Approver	QBC Board
Author	Manager - Ethics, Standards and Complaints
Owner	General Manager - Integrity and Risk
Steward	Executive Director - Governance Risk Ethics and Assurance
Version	1.0
Effective date	27 November 2025
Review date	27 November 2027 <i>(NOTE: Review the policy instrument at least every two years after publication, and every three years thereafter, unless circumstances require an earlier review.)</i>
Supporting policy documents	Conflict of Interest and Insider Trading Procedure Conflict of Interest and Insider Trading Guide

8. VERSION HISTORY

VERSION	DATE	AMENDMENT DETAILS
1.0	27 November 2025	New Policy. This involved: <ul style="list-style-type: none">• separating the Conflict of Interest Policy from the Procedure• combining the Conflict of Interest and Insider Trading Policy; and• developing a combined Conflict of Interest and Insider Trading Procedure.