

Foundations Group for Impact Investing

Foundations Group for Impact Investing (FGII) Conflicts Policy & Code of Conduct

Effective Date: 12 August 2025
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Approved by: FGII Steering Committee

1. Purpose of this Document

This policy protects the integrity and collaborative spirit of FGII by setting clear expectations for member and committee conduct, and by managing conflicts of interest. It ensures FGII remains a trusted, safe space for peer-to-peer learning, open dialogue, and market-building in impact investing.

2. FGII Context and Objectives

The Foundations Group for Impact Investing (FGII) is an independent market building initiative launched in 2023 existing to improve the supply and demand for impact capital. FGII achieves this through convening foundations and charitable funders who are interested in starting or enhancing their impact investing activities.

FGII's key market building objectives are to:

- Reduce impact investment transaction costs and market fragmentation; and
- Improve the flow of capital from foundations to For Purpose Organisations (FPOs).

Underpinning FGII's objectives are the desired impacts to create:

- Behaviour change: altering the way in which foundations and charitable organisations consider and allocate capital across the Spectrum to enable the greatest impact;
- Practice evolution; pooling resource: change the way in which investors operate with a shift to pooling expertise and resource to improve capital access for investees, unlocking greater impact; and
- Establishment of critical market infrastructure: knitting local and global practice to enable learning and access.

3. FGII Activities

To achieve its goals, FGII delivers activities including:

- Peer-to-Peer Learning Sessions – confidential, member-led discussions to share experiences and lessons.
- Market Information Days (MIDs) – presentations by FPOs actively seeking impact capital and support, followed by Q&A and discussion. These events are open to all unless determined otherwise by the FGII Steering Committee.
- Educational Events – amplifying the reach of impact investing events run by critical market peers. These events are open to all unless determined otherwise by the FGII Steering Committee.
- Committee & Working Group Meetings – governance and strategy discussions guiding FGII's development.

4. Program Focus

- FGII programs are for knowledge-sharing, market-building and to achieve FGII's objectives.
- FGII does not endorse or recommend specific investments and bears no responsibility for outcomes from information shared.

5. Scope

This document applies to:

- All FGII members and their nominated representatives.
- All FGII Committee Members (including Steering Committee, working groups or advisory panels).
- Key staff in connection with FGII and / or via the Host Organisation including employees, contractors and volunteers, whether they are engaged full-time, part-time or as casuals.
- All FGII-hosted activities, including member-only meetings, online forums, and events.
- Lead contacts from each member organisation, key staff and all committee members will be required to acknowledge this policy when applying, renewing membership, or joining a committee.

6. Conflicts of Interest

Definition: A conflict exists when personal, organisational, or financial interests could influence, or appear to influence, a member's or committee member's FGII participation.

Key requirements:

1. Peer to Peer Learning Sessions (and other member-only events as determined by the FGII Committee)

- Member-only events are not open to individuals who also represent investees or intermediaries (e.g. consultants) with direct interests in securing sales and fundraising revenue or investment from FGII members/foundations.
- Member organisations should nominate a representative without such conflicts for member-only attendance
Member-only events may be opened up at the discretion of the FGII Steering Committee

2. Committee participation

- Committee members must declare conflicts prior to joining and whenever circumstances change (as documented in the Conflicts of Interest register)
- Committee members with a conflict in a particular discussion or decision should excuse themselves from that item unless otherwise agreed by the Chair.

3. Disclosure

- All other conflicts (actual, potential, or perceived) must be disclosed to FGII for review and appropriate management.

4. Ongoing Updates

- Members, committee members and staff must advise FGII if conflicts arise after joining. FGII will conduct periodic data refreshes (i.e from 1 July bi-annually) to capture updated declarations.

7. Standards of Conduct

At all FGII activities, members and committee members will:

- Engage in constructive, educational discussion — not marketing or solicitation.
- Avoid discriminatory, harassing, or bullying behaviour.
- Maintain confidentiality of all non-public information shared within FGII.

8. Confidentiality

- Member-only and committee sessions are private; do not share content, contact lists, or discussions outside FGII without permission.
- Respect “Chatham House Rule” where applicable — information can be used, but attribution is not allowed unless agreed.

9. Breaches

Breaches of this policy may result in:

- Private discussion and resolution.
- Restrictions on event or committee participation.
- Suspension or removal from FGII membership or committee roles.

10. Review

This policy will be reviewed annually to ensure it reflects FGII’s evolving role and membership needs. Should the lead contact change, it is the responsibility of the lead contact to appoint a replacement and notify the FGII representative.