

PURPOSE

The aim of this Policy is to ensure all business related gifts and benefits given and received by Evolve Housing Limited and its controlled entities excluding Evolve Housing Vic Limited (referred to as the Company) and its staff are properly managed and disclosed. It is essential that staff do not place themselves in situations which could lead to, or be seen to give rise to a conflict of interest.

POLICY REFERENCE	GRC024.4
POLICY OWNER	General Manager, Governance and Legal
APPROVED BY	Evolve Housing Ltd Board of Directors
APPROVAL DATE	4 July 2022
REVIEW DATE	4 July 2025

GIFTS AND BENEFITS POLICY**1. IN AND OUT OF SCOPE**

This Policy applies to all Employees of Evolve Housing Ltd as relevant and its controlled entities (with the exception of Evolve Housing Vic Limited which has adopted a separate policy akin to this Policy). It applies at all times and in relation to all cultural and religious holidays, occasions and other events which involve the giving/receiving of gifts.

2. POLICY STATEMENT

This Policy sets out the Company's approach regarding the management of gifts and benefits – particularly those received by Evolve Housing Employees. When followed, this approach will provide protection for staff members and their reputation, as well as that of the Company, and minimises potential negative consequences.

The Company is committed to being a professional and ethical workplace. This can only be achieved and maintained if the community is confident that staff are not influenced by gifts, benefits or bribes.

2.1 Overview

For Employees, there are many real and perceived risks associated with being offered or accepting gifts or benefits. Gifts may be offered/received as an expression of gratitude rather than influence, with no obligation to repay in kind, or to create a feeling of obligation. In the business context, gifts can have different meanings and purposes.

To a certain extent, the purpose of the gift affects how it should be managed. Employees should exercise judgement in determining whether receiving a gift could be seen by others as an inducement, which could place that staff member under an obligation to the donor or associated parties.

2.2 Employee Responsibilities

All Staff and Executives must provide an email notification to the Governance and Legal (GAL) team as soon as possible, but no later than ten (10) days after receiving or being offered a gift or benefit. The following details must be included in the email notification:

- Employee or team receiving the gift or benefit;
- Date the gift/benefit was received;
- Individual or organisation offering the gift or benefit;
- A short description of the gift/benefit;
- Reason the gift or benefit has been received or offered (even if not accepted);
- An estimate of the value of the gift or benefit.

This information will then be added to the Gifts and Benefits Register.

All items received should be declared, including token gifts from residents e.g. biscuits, chocolates, homemade items.

2.3 Gifts or benefits over \$100

Wherever possible, a gift or benefit with a value greater than \$100 should not be accepted. However from time to time, it may not be possible or appropriate to refuse a gift in excess of \$100. In this case, the relevant General Manager or other member of the Executive should be notified immediately.

In this situation, the gift or benefit should either be shared among the staff of the recipient's team, be donated to the Evolve Staff Club, or otherwise dealt with as seen fit by the General Manager. Gifts offered to EHL Group (as opposed to an individual) should be shared with all staff.

Gifts or benefits received which are greater than \$100 must also be advised to GAL in the same manner as set out in Section 3.2 above.

2.4 Reporting

A copy of the Gifts and Benefits Register should be provided to the Finance, Risk and Audit Committee on their request. It is an NRSCH requirement that the Register is also submitted on an annual basis to the Registrar for compliance assessment purposes.

2.5 Breaches and disciplinary action

The Company may take applicable disciplinary action if it is found that an Employee is deliberately not reporting gifts and/or benefits which they have received and/or given. An incident report will also be lodged with the Board Finance, Risk & Audit Committee (FRAC).

2.6 Further Information

2.6.1 If an Employee is ever unsure about whether or not to accept or to give a gift or benefit, clarification should be sought from their relevant Line Manager or the Governance and Legal team. Further information is also available in the Conflict of Interest Policy and the Fraud, Bribery and Corruption Prevention Policy.

- 2.6.2 If an Employee believes that s/he has been offered a bribe they should immediately notify their relevant General Manager as well as the Governance and Legal team. Where deemed necessary the NSW Police or other authority will also be immediately notified.
- 2.6.3 From time to time Evolve may deem it appropriate to give or offer gifts or benefits to an individual or organisation external to Evolve. This situation is addressed in Evolve's Fraud, Bribery and Corruption Prevention Policy.

3. DEFINITIONS

Benefit	similar to a gift in that it is of value to the recipient, but less tangible. For example meals, seats at sporting events, access to corporate boxes at sporting venues, upgrades on flights, or access to confidential information
Bribe	a payment, or offer of payment, of any kind (for example money, gifts or benefits) which will, or is intended to, cause a person to act in a way that is: <ul style="list-style-type: none"> ▪ contrary to the interests of Evolve; ▪ contrary to the interests of Evolve's Residents; ▪ contrary to the interests of Evolve's clients; ▪ contrary to Evolve's policies; ▪ against the public interest. A Bribe can be offered to or solicited from a person or company. Bribes include payments intended to influence the outcome of a specific action or event, or actions over a period of time.
Employee	any person employed by, or engaged to represent, Evolve Housing.
Gift	an item of value. For example; a gift voucher, entertainment, hospitality, travel, commodity, property etc. which one person or organisation presents to another
Gift of Gratitude	a gift that is offered to an individual or an organisation in appreciation of performing specific tasks or for exemplary performance of duties
Gift of Influence	a gift that is intended to generally ingratiate the giver with the recipient for favourable treatment in the future
Gifts and Benefits Register	the official Evolve Housing record of all gifts and benefits received or given by Evolve Housing Employees
Workplace	the office or any alternative location where an employee is representing the company

4. RELATED RESOURCES

- Code of Conduct
- Conflict of Interest Policy
- Fraud, Bribery and Corruption Prevention Policy
- Whistle Blowing Policy
- *Housing Act 2001 (NSW)*

This Policy is subject to change from time to time at the discretion of Evolve Housing Limited. Any approvals required under this Policy will be granted in accordance with the Company Delegations of Authority Policy unless specified otherwise

5. VERSION CONTROL

VERSION	Date Approved	Author	Key Changes
1.0	1/11/2016		Policy adopted
2.0	4/07/2022	Raylee Golding, GM GAL/ Co Sec	Application of policy extended to controlled entities (excluding Evolve Housing Vic Limited)