

PURPOSE

The aim of this Policy is to ensure all business related gifts and benefits given and received by Evolve Housing Limited (EHVL) 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	VGRC007.1
POLICY OWNER	General Manager, Governance and Legal
APPROVED BY	Evolve Housing Ltd Board of Directors
APPROVAL DATE	1 Feb 2021
REVIEW DATE	1 Feb 2024

1. SCOPE

This Policy applies to all Employees of EHVL. 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 states EHVL's approach regarding the management of gifts and benefits – particularly those received by EHVL Employees. When followed, this approach will provide protection for staff members and their reputation, as well as that of EHVL, and minimises potential negative consequences.

EHVL 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.

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.

If an Employee is ever unsure about whether or not to accept/give a gift/benefit, clarification can be sought from their relevant Line Manager or the Governance and Legal team.

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 necessary the NSW Police or other authority will also be immediately notified.

2.1 Gifts and Benefits Register

All Employees must provide an email notification to the Governance and Legal team within 10 days of receiving/being offered/giving any gifts or benefits. The following details must be included in the email notification:

- Date the gift/benefit was received;
- Person(s) or organisation(s) involved in receiving the gift;
- A short description of the gift/benefit;
- Reason the gift/benefit has been given/received;
- The estimate of the value of the gift/benefit – this must be provided even with

token gifts. 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.

Any benefits or gifts with a value greater than \$100 should not be accepted.

A quarterly review of the Register enables the Board to identify and manage any emerging risks. It is an NRSCH requirement that the Register is also submitted on an annual basis to the Registrar of Community Housing as a part of registration requirements.

3.1 Breaches and disciplinary action

EHVL may take applicable disciplinary procedures if an Employee is found to be deliberately not reporting received/given gifts and/or benefits. An incident report will also be lodged with the Board.

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 gift or benefit offered to or solicited to influence that person to act in a particular way and to induce the recipient to act in a way that is contrary to the known rules of honesty and integrity
- Employee – any person employed by, or engaged to represent, EHVL
- 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 EHVL record of all gifts and benefits received or given by EHVL Employees
- Workplace – the office or any alternative location where an employee is representing the company

4. RELATED RESOURCES

- EHVL Code of Conduct
- EHVL Conflict of Interest Policy
- EHVL Whistle Blowing Policy

5. VERSION CONTROL

VERSION	Date Approved	Author	Key Changes
1.0	1/02/2021	GAL	Policy adopted