

## 1. PURPOSE

The aim of this policy is to ensure all business-related gifts and benefits given and received by Evolve Housing Limited and its Employees and Directors are properly managed and disclosed to ensure there is no actual or perceived conflict of interest.

<b>POLICY REFERENCE</b>	GRC024
<b>POLICY OWNER</b>	Group General Manager Growth, Governance, Legal & CoSec
<b>APPROVED BY</b>	Evolve Housing Ltd Board of Directors
<b>APPROVAL DATE</b>	September 2025
<b>REVIEW DATE</b>	September 2028

## 2. SCOPE

The Policy applies to Evolve Housing Limited and its controlled entities described in *Section 5* of this policy (together referred to as the **Company**), the Group Executive Team (GET), Directors of the Company and all Employees, and should be read in conjunction with other Evolve Housing Group Policies.

This Policy is designed to comply with Evolve Housing Group's legal and ethical obligations. Where this Policy is inconsistent with any laws or regulations imposed on the Company, that legal obligation takes precedence over this Policy.

## 3. INTRODUCTION

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 Employees 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 Employees and Directors 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.

## 4. POLICY

### 4.1. Receiving Gifts or Benefits

All Gifts or Benefits received must be declared, including token Gifts from residents e.g. biscuits, chocolates, homemade items. All Staff and Executives must provide an email notification to the Growth, Governance and Legal (GGAL) team via [compliance@evolvehousing.com.au](mailto:compliance@evolvehousing.com.au) as soon as possible, but no later than ten (10) days after receiving a gift or benefit. The following details must be included in the email notification:

- Employee or team receiving the gift/benefit
- Date the gift/benefit was received
- Individual or organisation offering the gift/benefit
- A short description of the gift/benefit
- Reason the gift or benefit has been received or offered
- An estimate of the value of the gift/ benefit.

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

#### 4.2. Giving Gifts or Benefits

If it is your intention to give a Gift or Benefit to a customer, client or contractor, you must first obtain the approval of your Group General Manager. If approved by your Group General Manager, please provide an email notification to GGAL per the process above **before** giving the gift or benefit.

#### 4.3. Gifts or benefits over \$150

Wherever possible, a Gift or Benefit with a value greater than \$150 should not be accepted or given. However, from time to time, it may not be possible or appropriate to refuse a gift in excess of \$150. In this case, the relevant Group General Manager must approve this transaction via an email to [compliance@evolvehousing.com.au](mailto:compliance@evolvehousing.com.au), when notifying GGAL of the gift or benefit per *Sections 4.1.and 4.2* above

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

#### 4.4. Reporting

The Gifts and Benefits Register is submitted to the National Regulatory System for Community Housing (NRSCH) Registrar on an annual basis to meet our compliance requirements. A copy of the Gifts and Benefits Register may be provided to the Finance, Risk and Audit Committee (FRAC) upon request. The register is also regularly monitored for effectiveness as it is a key control for our Fraud, Bribery and Corruption enterprise risk.

#### 4.5. 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 FRAC.

#### 4.6. Key Points to Remember

- If an Employee is ever unsure about whether or not to accept or give a gift/ benefit, clarification should be sought from their relevant Line Manager or the GGAL team. Further information is also available in the *Conflict of Interest Policy* and the *Fraud, Bribery and Corruption Prevention Policy*.
- If an Employee believes that they have been offered a Bribe they should immediately notify the relevant Group General Manager as well as the GGAL team.
- If in doubt with either of the two points above, contact the GGAL team for advice.

### 5. APPLICABILITY

This policy applies to:

<b>Company</b>
Evolve Housing Limited
EchoRealty NSW & ACT Limited
Evolve Arncliffe Limited
Evolve Blacktown Limited
Evolve Penrith Limited
Evolve Melrose Park Limited
Evolve Merrylands Limited
Evolve Granville Limited
Evolve Edgecliff Limited
Evolve Carinya Limited

**6. DEFINITIONS**

No.	Term	Definition
1	Company	Evolve Housing Limited and its controlled entities
2	GET	Group Executive Team
3	FRAC	Finance, Risk & Audit Committee
4	Employees	Individuals who perform work or services for our Company, whether on a permanent, temporary, full-time, part-time, or contractual basis
5	Gift	An item of value. For example: a gift voucher, entertainment, hospitality, travel, commodity, property etc. which one person or organisation presents to another
6	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 which one person or organisation presents to another
7	Bribe	<p>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:</p> <ul style="list-style-type: none"> <li>• contrary to the interests of Evolve;</li> <li>• contrary to the interests of Evolve’s Residents;</li> <li>• contrary to the interests of Evolve’s clients;</li> <li>• contrary to Evolve’s policies;</li> <li>• against the public interest.</li> </ul> <p>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.</p>
8	Gifts and Benefits Register	The official Evolve Housing record of all gifts and benefits received or given by Employees
9	Workplace	The office or any alternative location where an Employee is representing the Company

**7. RELATED DOCUMENTS**

- Code of Conduct
- Conflict of Interest Policy

- Fraud, Bribery and Corruption Prevention Policy
- Whistleblower Protection Policy
- Housing Act 2001 (NSW)

**8. VERSION CONTROL**

Date Reviewed	Policy Reviewer	Key Changes
1/11/2016		Policy adopted
4/07/2022	Raylee Golding	Application of policy extended to controlled entities
1/09/2025	Suzanne Prabhudesai	Cyclical reviews and updates to include gift giving guidelines and alignment with other related policies.