

Gift and Gratuities Policy

Our Code of Conduct requires that all employees maintain a high standard of integrity and professionalism; exercise fairness and equality in dealing with other employees, clients and suppliers; and avoid the perception that any business transaction may be influenced by the offering or accepting of gifts.

To support our commitment to these standards all employees must abide by the following gift policy. Any exceptions to this policy are at the discretion of the CEO/Managing Director/Manager.

Policy

Gifts, services, entertainment or other common courtesies that conform to normally accepted business practices and are free of any “conflict of interest” situation may be accepted.

This includes:

- Items including pens, hats, T-shirts, mugs, calendars etc.
- Items of a value of no more than \$50 in a single calendar year from any existing or potential client, supplier or vendor.
- Food, beverages and moderately priced meals or tickets to local events that are supplied by and attended by current clients, partners, vendors or suppliers as part of a working meeting where business is discussed, and positive relationships are built. These types of activities would be expected to be reciprocated by our company.
- Thank you notes, cards, certificates or other forms of written recognition.
- Gifts such as pens, T-shirts, show bags and other items that employees receive, as members of the public, at events such as conferences, trade shows, seminars and training courses are

acceptable if they are offered to all people attending the event.
This also applies to food and beverages supplied at such events.

Cash payments or cash equivalents such as gift certificates/cards are not to be accepted, regardless of the amount, from any existing or potential client, supplier or vendor.

When gifts are received in the course of carrying out your normal duties then ownership of the gift belongs to the company.

Applying this Policy

Any gift must immediately be reported to your manager and appropriately recorded in the Gift Register.

You may retain gifts having a nominal value only with the consent of the Company.

In the event that a gift is received that is of a greater value than \$50, the company will determine whether:

- The gift is returned.
- The gift can be easily shared amongst all employees.
- The gift will be raffled off to all employees. Proceeds from the raffle will be donated to *charity/put towards employee holiday party or event/other equitable outcome*. If employees have no interest in the raffled item, it will be donated to charity.

If you have any question or need any clarification of any aspect of this policy, please check with your manager.



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