

Foreword

Safespear are committed to conducting our business with honesty and integrity, and as such we expect all employees to maintain high standards in accordance with our Code of Business Conduct and Ethics and Anti-Bribery and Corruption Policy.

This Gifts & Hospitality Policy sets out the general rules and principles to which we adhere. It will be communicated to all employees of Safespear and any relevant third parties. Through the procedures explained in this policy, Safespear can maintain its high ethical standards and protect its reputation against allegations of bribery and corruption. The successful implementation of this policy requires proactive adoption at the following levels:

- You – as an employee of Safespear, are required to read and understand all aspects of this policy and abide by it.
- Line Management – Ensuring your departments overall compliance with the requirements of this policy is the responsibility of the Line Manager.
- Compliance Officer – Is responsible for overseeing the implementation of the policy throughout all departments, providing necessary training, updating the policy and supervising the monitoring and review processes.
- Safespear's Board – Has overall responsibility for implementation of the policy and monitoring compliance with the policy.



Barry McGuire

Chairman

Introduction

The giving of gifts and hospitality is a normal part of business. However, the giving or receiving of gifts or hospitality could influence, or be perceived to be capable of influencing a transaction. As such, they could be considered a bribe, especially if they are lavish or inappropriate. On no account should gifts be accepted that have the potential to cause reputational damage to Safespear.

Interpretation

The following terms are defined in this policy as:

Gift: Any item, cash or goods or service which is offered to an individual at no cost to them, or at a cost which is less than its commercial value. Examples include cash, loans, discounted goods, marketing material [eg; stationery, calendars, mugs etc;] or perishable goods such as food and / or drink.

Hospitality: Any generous or material reception or entertainment offered to an individual at no cost to them, or at a cost which is less than its commercial value. Examples include, but are not limited to; drinks, receptions, dinner invitations or corporate hospitality at sporting events.

Policy Statement

It is Safespear's policy to conduct all of its business in an honest, transparent and ethical manner and Safespear operates a zero tolerance approach to any acts of corruption in its organisation.

Safespear acknowledges that the giving and receiving of Gifts & Hospitality can be a useful tool in building and maintaining business and client relationships, however, in some circumstances, it may give rise to a conflict of interest between an individual's personal enjoyment and professional responsibility. If the giving and receiving of Gifts & Hospitality is not handled in a prudent manner, the professional integrity of Safespear and its management may be called into question and potential allegations of bribery, compromise or conflict of interest may arise.

Safespear relies on the underlying principles of trust and confidence in order to prevent this from occurring in its organisation and it is imperative that these values are upheld by all employees at all times.

General Application

This policy applies to all individuals working at all levels of the organisation, including directors, managers, officers, employees, consultants, contractors, trainees, home-workers, part-time and fixed-term workers, casual and agency staff and volunteers [collectively referred to as **Employees** in this policy].

Although all employees are required to abide by the terms of this policy, this policy does not form part of any employee's contract of employment and it may be amended at any time.

This policy is intended to complement Safespear's Anti-Bribery & Corruption Policy, Code of Business Conduct & Ethics Policy and Whistle-Blowing Policy and should be read in conjunction with these documents.

Employees should be aware that any breach of this policy may be regarded as an act of gross misconduct and may lead to disciplinary action under Safespear's Disciplinary Procedure, up to and including summary dismissal.

Safespear's Board of Directors [the **Board**] reserves the right to amend this policy from time to time, to ensure continuing compliance with Safespear's legal obligations.

Policy Aims

The aims of this policy are:

- To provide guidance and support to employees who, in the course of their day to day work or provision of services to Safespear, or as a result of their employment with Safespear either;
 - Receive offers of Gifts & Hospitality; or
 - Provide Gifts & Hospitality to others on behalf of Safespear
- To ensure that the business conduct of all employees is appropriate to the nature of Safespear's business and the environment in which we operate and to avoid the potential of any perceived or real conflict of interest or allegation of compromise, bribery or corruption;
- To develop a clear reporting system for all employees who feel that they may have a conflict of interest or concern regarding the giving or receiving of Gifts and / or Hospitality;
- To encourage a transparent and open culture within Safespear, where Safespear's values of trust and confidence are upheld.

Responsibility

Safespear's Compliance Officer has overall responsibility for the day to day operation of this policy and for ensuring that Safespear's Gift & Hospitality Register is maintained.

Individual employees are personally responsible for reporting any Gifts or Hospitality offered [in accordance with the terms of Appendix 1 in this policy], either to them by a third party, or by them to a third party and should state whether these have been accepted, declined or donated.

Gifts

In order to promote Safespear's values and trust, confidence and transparency:

- On no account should gifts be accepted which could influence, or be perceived to be capable of influencing, a transaction and as such could be considered a bribe.
- On no account should gifts be accepted that have the potential to cause reputational damage to Safespear.
- Gifts believed to be over \$150 in commercial value must be approved by the Compliance Officer and shall be recorded in the Gifts & Hospitality Register.
- Gifts believed to be over \$250 in commercial value should generally be declined. They may only be accepted with the prior approval of the Compliance Officer and, even if not approved, shall be recorded in the Gifts & Hospitality Register.
- In circumstances where declining a gift is likely to cause major offence [for example, a gift from a visiting foreign dignitary] the gift may be accepted, with the permission of the Compliance Officer, and then donated to a charity of the Board's choice. Details of the gift, its estimated value, its donor and the charity to which the gift has been donated, should be recorded in the Gifts & Hospitality Register.
- Where it is impractical to decline or return a perishable gift, or to donate it to charity, the perishable gift may, at the discretion of the Compliance Officer, be opened and shared with Safespear's employees at a suitable gathering [for example the Christmas party]. Employees are not permitted to retain or use such gifts solely for their own use. Raffle or personal distribution of such gifts to others by employees is not permitted. Again, in these circumstances, details of the gift, its estimated value, its donor and the charity to which the gift has been donated, should be recorded in the Gifts & Hospitality Register.

Hospitality

GIFTS & HOSPITALITY POLICY



Safespear acknowledges that in some circumstances, it may be appropriate for employees to accept hospitality from clients, customers or contacts, in the normal course of business. Safespear requests employees to use their judgement when accepting hospitality from third parties and to consider the appropriateness and frequency of the hospitality to ensure that it is reasonable and can be justified.

In order to promote Safespear's values of trust, confidence and transparency:

- On no account should hospitality be accepted which could influence, or be perceived to be capable of influencing, a transaction and as such could be considered a bribe;
- On no account should hospitality be offered or made that have the potential to cause reputational damage to Safespear;
- On no account should hospitality be offered or made if the result of the hospitality is to make the recipient feel obliged, or could be viewed as intending to make the recipient feel obliged, to start or continue a commercial relationship or to act improperly;
- Where the commercial value of hospitality offered or made to a third party is believed to be over \$200 this must be approved by the Compliance Officer and shall be recorded in the Gifts & Hospitality Register;
- Hospitality believed to be over \$250 in commercial value may not be offered or made without prior approval of the Compliance Officer;

If the purpose of offering hospitality, including a working lunch or refreshments, is to make the recipient feel obliged, or could be viewed as intending to make the recipient feel obliged to start or to continue a commercial relationship or to act improperly, it will be in contravention of this policy.

Reporting

Compliance Officer: Louise Birnie

Telephone Number: 08 9353 3752

Email: louise.birnie@safespear.com.au

Your line manager is the main point of contact for employees to consult with about offers of gifts or hospitality from third parties. Safespear has appointed a Compliance Officer who will supervise and assist each line manager with all matters relating to this policy, and who can also be contacted by employees regarding any queries. The Compliance Officer will also maintain a Master Gift & Hospitality Register for the whole of Safespear. An example of a Gift & Hospitality Register is set out in Appendix 2.

If an employee has any doubts as to whether or not the offering or accepting of gifts or hospitality would be deemed unacceptable, he / she should consider the following:

- The reason for the gift or hospitality being offered;
- How accepting the gift or hospitality would appear to other people;
- Whether or not they would feel obliged to reciprocate;
- If accepting the gift or hospitality would affect, or appear to affect, their judgement;
- Whether any effort is being made to conceal the gift or hospitality;

If any doubts remain after answering the above questions, employees should consult the Compliance Officer to seek guidance on the matter.

Where any gifts or hospitality is offered, accepted, declined, donated [or shared with employees if perishable] or returned [apart from the exceptions, as set out in Appendix 1] details of the value, type and donor of the gift or hospitality, as well as whether it was accepted, declined, donated or returned, should be reported to the Compliance Officer within 5 days of the offer being made. The Compliance Officer will then record these details within Safespear's Gift & Hospitality Register.

GIFTS & HOSPITALITY POLICY



If an employee wishes to offer a third party any gift or hospitality from Safespear, permission from the Compliance Officer must be first obtained. Employees should provide the Compliance Officer with the details of the gift or hospitality to be offered, as well as its commercial value [estimated if not known], who it is being offered to and the reason for offering it. The compliance Officer will then inform the employee whether it is acceptable to make such an offer of a gift or hospitality to a third party. Even after receiving permission from the Compliance Officer, it will still be necessary to enter details of the gift or hospitality being offered into the Gift & Hospitality Register.

Where any employee believes that another employee may have accepted the offer of a gift or hospitality which is deemed unacceptable under this policy and which has not been permitted by the Compliance Officer, or where another employee has not reported the offer of a gift or hospitality to the Compliance Officer, that employee should report the matter in accordance with Safespear's Whistle-Blowing Policy, which sets out how the matter should be escalated.

Employees are reminded that failure to report any gifts or hospitality to the Compliance Officer, where such reporting is necessary, or failure to report any breach of this policy by any other employee, will be in breach of the terms of this policy, may be regarded as an act of gross misconduct and may lead to disciplinary action under Safespear's Disciplinary Procedure up to and including summary dismissal.

APPENDIX ONE – EXAMPLE OF GIFTS & HOSPITALITY

Gift / Hospitality	Excluded or Acceptable	Record in Gift & Hospitality Register?
Gifts up to the commercial value of \$150	Acceptable provided the gift is reasonable and appropriate	No
Gifts between the commercial value of \$150 to \$250	Acceptable provided the gift is reasonable and appropriate. Must be approved by the Compliance Officer	Yes
Gifts over \$250 in commercial value	Must be reported to the Compliance Officer for a decision on whether the gift may be accepted	Yes whether approved or not approved
Hospitality up to the commercial value of \$150.00	Acceptable provided the gift is reasonable and appropriate	No
Hospitality between the commercial value of \$150 & \$250	Acceptable provided the gift is reasonable and appropriate. Must be approved by the Compliance Officer	Yes
Hospitality over \$250 in commercial value	Must be reported to the Compliance Officer for a decision on whether the gift may be accepted	Yes whether approved or not approved