

Gifts and Benefits Policy

1. Purpose

The purpose of this policy is to outline expectations relating to gifts and benefits and, protect the reputation of directors, employees, the organisation, and by association, the community housing sector, from potential harm due to the inappropriate receipt or giving of gifts or benefits.

2. Scope

Gifts or benefits offered to any director or employee of Pacific Link Housing (PLH) and its wholly owned subsidiaries (PLH Group).

3. Policy and Guidelines

The receipt of gifts or benefits by employees or directors may be perceived by others as an inducement which could place a director or employee under an obligation to the person or entity offering the gift or their associated parties. This also applies in the reverse.

This policy prohibits the receipt of gifts or benefits by directors and employees. In particular, directors and employees must not:

- (i) Solicit for private purposes any gift or benefit in connection with their official functions and duties
- (ii) Accept any gift or benefit for any functions or duties, performed or not performed, which are part of their normal duties
- (iii) Accept any offer of money in any form, e.g. cash, pay out of a loan.

Where a director or employee considers that the offer of a gift or benefit constitutes a bribe, they should terminate the transaction and report their concerns to the Group CEO or the Board immediately.

Where PLH Group or a director or employee is proposing to give a gift to an external party, consideration should be given to whether they may have a similar policy and how this may be perceived by the recipient and their associated parties.

4. Examples of Gifts or Benefits

Gifts or benefits include monetary gifts, goods, services, discounts, favours or special consideration. Examples include:

- Cash
- Free or discounted entry to events
- Free travel or travel concessions
- Access to holiday accommodation
- Free or discounted services provided by suppliers
- Free or discounted goods supplied by contractors.

While these items cannot be accepted personally as gifts by directors or employees, they may

be accepted as donations to support PLH’s purpose under PLH’s Donations Policy.

5. Gifts of Nominal Value

Generally token gifts of small monetary value, typically under \$100, that are supplied by contractors or consultants as part of end of year traditions can be accepted. These are pooled and distributed equitably to employees. Example of such gifts include;

- Food, Chocolates, Sweets
- A bottle of wine
- Flowers.

6. Complaints and Appeals

Any person who believes that there has been a breach of this policy must raise their concerns with Group Executive Manager, Legal, Compliance & Risk. If the breach amounts to fraud, consideration should be given to reporting the breach under the organisation’s Fraud Control Policy.

Related Policies

CP-50 Donations Policy
CP-54 Fraud Control Policy

Policy Owner	Group Executive Manager, Governance, Policy & Advocacy
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