

## 1. Gifts and Benefits Policy

## 2. Values Statement

RedR Australia (“RedR”) is guided by its values of accountability, integrity, empathy and collaboration. It is in RedR’s interest to ensure that it has policies and procedures in place that support its values, which are adopted by RedR members.

## 3. Purpose

The purpose of this policy is to set out RedR’s the conditions under which RedR members can provide, accept or decline gifts or benefits in a manner that is consistent with RedR’s Code of Conduct.

This policy details RedR’s approach to managing gifts and hospitality, facilitation payments and donations (referred to collectively as “gifts and benefits” for the purpose of this policy).

The policy does not address all possible situations that may arise within the wide range of activities carried out by and through RedR but provides a process that can be applied in most situations.

This policy should be read in conjunction other policies, such as RedR’s Code of Conduct and related policies and documents outlined in Section 10.

## 4. Scope

This policy applies to:

- All employees, volunteers, contractors, and interns/work placements of RedR
- Associate trainers
- RedR deployees
- Standby personnel/applicants.
- Board members.
- Third parties

## 5. Policy Statement and Principles

In the course of duty, RedR members may be offered gifts or benefits by third parties or may provide gifts or benefits to third parties. RedR has adopted this Gifts and Benefits Policy (“Policy”) to provide guidance to RedR members on how to manage any gifts or benefits they may be offered or any gifts or benefits they may offer to third parties.

## 6. Procedures

### 6.1 Gifts and Hospitality

#### Accepting a Gift or Hospitality

The giving or receiving of gifts and hospitality are not prohibited, if the following requirements are met:

- a) It is not made with the intention of influencing, inducing, or rewarding a third party in order to gain any advantage through improper performance, or in explicit or implicit exchange for favours or benefits.
- b) It complies with local law and RedR's Code of Conduct.
- c) It is given in RedR's name (not in the RedR member's name)
- d) It does not create an actual or perceived conflict of interest.
- e) It does not include cash or a cash equivalent (such as gift certificates or vouchers);
- f) The RedR member considers the reason for the gift or hospitality, and the gift or hospitality is of an appropriate type and value and given at an appropriate time. In relation to the latter, for example, RedR should not accept a gift or benefit from a third party if RedR is participating in a tendering process with them.
- g) The RedR member has disclosed and received approval from their line manager in advance (where it is possible to do so, or as soon as possible afterwards).
- h) On acceptance or provision of the gift or hospitality, the RedR member informs the Chief Financial Officer ("CFO") and declares the gift or hospitality in the Gifts and Benefits Register.

Where it is an accepted part of a RedR member's role, they can offer and accept a reasonable amount of hospitality for the purposes of business development, having regard to all the above requirements.

RedR members should exercise caution before offering and/or accepting a gift or hospitality. Where RedR members are uncertain of what is reasonably acceptable, they should enquire with their line manager or the CFO.

Attached to this policy is Diagram 1 "Acceptance and Provision of Gifts and Benefits Process". This appendix is intended to direct RedR members on the requirements that need to be met before accepting or providing a gift or benefit and should be read in conjunction with the above and below processes.

## **Gift Giving**

RedR appreciates that the practice of giving business gifts or hospitality varies between countries and regions and what may be normal and acceptable in one country or region may not be in another.

The test to be applied is whether, in any circumstances, the gift or hospitality is reasonable, proportionate, and justifiable. In this regard, RedR members should receive approval from their line manager before a gift or hospitality is offered and/or provided to a third-party. Where RedR members are uncertain of what is reasonably acceptable for gift giving, they should enquire with their line manager or the CFO.

## **6.2 Facilitation Payments**

RedR does not make, and will not accept, facilitation payments of any kind. The following applies in regard to facilitation payments:

- a) If a RedR member is asked to make a payment on RedR's behalf, they should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. RedR members should always ask for a receipt which details the reason for the payment. If a RedR member has any suspicions, concerns or queries regarding a payment, they should raise these with the CFO.
- b) Whilst Australian law prohibits facilitation payments, RedR members are not required to place their life or liberty at risk. Any such perceived incidents of extortion (e.g., such as threats or acts of intimidation) should be reported to the CFO at the first available opportunity.
- c) All RedR members must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by RedR.

## 6.3 Donations and Sponsorships

The following applies in regard to donations and sponsorships:

- a) RedR does not make donations to political parties.
- b) RedR will only make charitable donations that are legal and ethical under local laws and practises.
- c) RedR members should enquire and obtain approval from their line manager before making a donation on behalf of RedR to ensure it is compliant with this policy.
- d) Sponsorship items are not classified as a donation. Requests for sponsorship should be forwarded to the Chief Executive Officer (“CEO”) for approval in the first instance.

## 6.4 Reporting a Gift or Benefit

All gifts and benefits greater than \$100AUD (excluding GST) are required to be reported and recorded in RedR’s Gifts and Benefits Register, regardless of whether it has been accepted or declined by the RedR member or third party. The following applies in regard to reporting a gift or benefit:

- a) Where multiple gifts or benefits are received from the same party fall below the threshold individually but together total a value more than \$100AUD (excluding GST), RedR requires for those gifts or benefits to be disclosed within the Gifts and Benefits Register.
- b) Any gifts or benefits offered to third parties by RedR members are required to be recorded in the Gift and Benefits Register, regardless of whether the gifts or benefits have been accepted or declined by the third party.
- c) RedR will inform the giver or receiver of the gift or benefit that their information will be recorded in the register. This is in accordance with the Privacy Act 1988.
- d) Any gift or benefit that is accepted by a RedR member is accepted on behalf of RedR and becomes the property of RedR.
- e) Line managers should ensure that gifts or benefits provided are used for RedR’s benefit, and as such the keeping or using of gifts or benefits by RedR members individually is not allowed. A possible exception to this could apply where non-acceptance may cause offence to the donor of the gift, and where the gift, while material, is not considered extravagant.
- f) Gifts and benefits should not be offered to, or accepted from, government officials or representatives, or politicians or political parties.

Attached to this policy is Diagram 2 “Gifts and Benefits Reporting Process”. This diagram is intended to direct RedR members on how to report gifts and benefits and should be read in conjunction with the above processes.

## 6.5 RedR’s Gifts and Benefits Register

The CFO must maintain a register of all gifts and benefits (per the threshold identified in Section 6.4 that have been offered to or by RedR members in the course of their employment (referred to as “RedR’s Gifts and Benefits Register” throughout this policy). The following applies in regard to RedR’s Gifts and Benefits Register:

- a) It is the responsibility of the CFO to communicate the Gifts and Benefits Register to RedR members within Australia.
- b) It is the responsibility of each RedR member to submit relevant information to the CFO, which will be reviewed on a monthly basis. Relevant information includes:
  - The Date the gift or benefit was received.
  - The type of gift or benefit received.
  - Details of the RedR member or third-party who received the gift or benefit.
  - Details of the giver of the gift or benefit.
  - The occasion or reasoning for gift or benefit.
  - Estimated value of the gift or benefit.

- c) It is the responsibility of the CFO to review the Gifts and Benefits Register monthly. This includes inspecting the Gifts and Benefits Register for any lavish gifts or benefits that have been offered and/or accepted by RedR members or by third parties.

## 6.6 Disposal of a Gift or Benefit

Where a RedR member determines that to refuse a gift or benefit would cause embarrassment or offence for RedR, the RedR member may dispose of the gift in a manner that does not offend the giver after discussion with the Chief Financial Officer. Disposal of a gift or benefit should be reported to the CFO and recorded in RedR's Gifts and Benefits Register.

## 7. Roles and Responsibilities

### Board Members responsibility:

- Overall responsibility for ensuring this policy complies with all relevant legal and ethical obligations, and that all those RedR's control comply with it.
- To endorse the policy

### Chief Executive Officer responsibility:

- Endorse the policy

### Chief Financial Officer responsibility:

- The policy aligns with relevant legislation, government policy and / or RedR requirements/strategies/values
- The policy is implemented and monitored and is reviewed to evaluate its continuing suitability, adequacy and effectiveness. Improvement identified will be made as soon as possible
- Oversight and management of the Gifts and Benefits Register
- Ensuring all employees are communicated to appropriately.
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### All RedR Members responsibility:

- For ensuring the success of this policy
- Declaring any gifts or benefits received or given in the course of their employment
- Provide suggestions and comments on how this policy can be improved

## 8. Flow Chart

Diagram 1: Acceptance and provisions

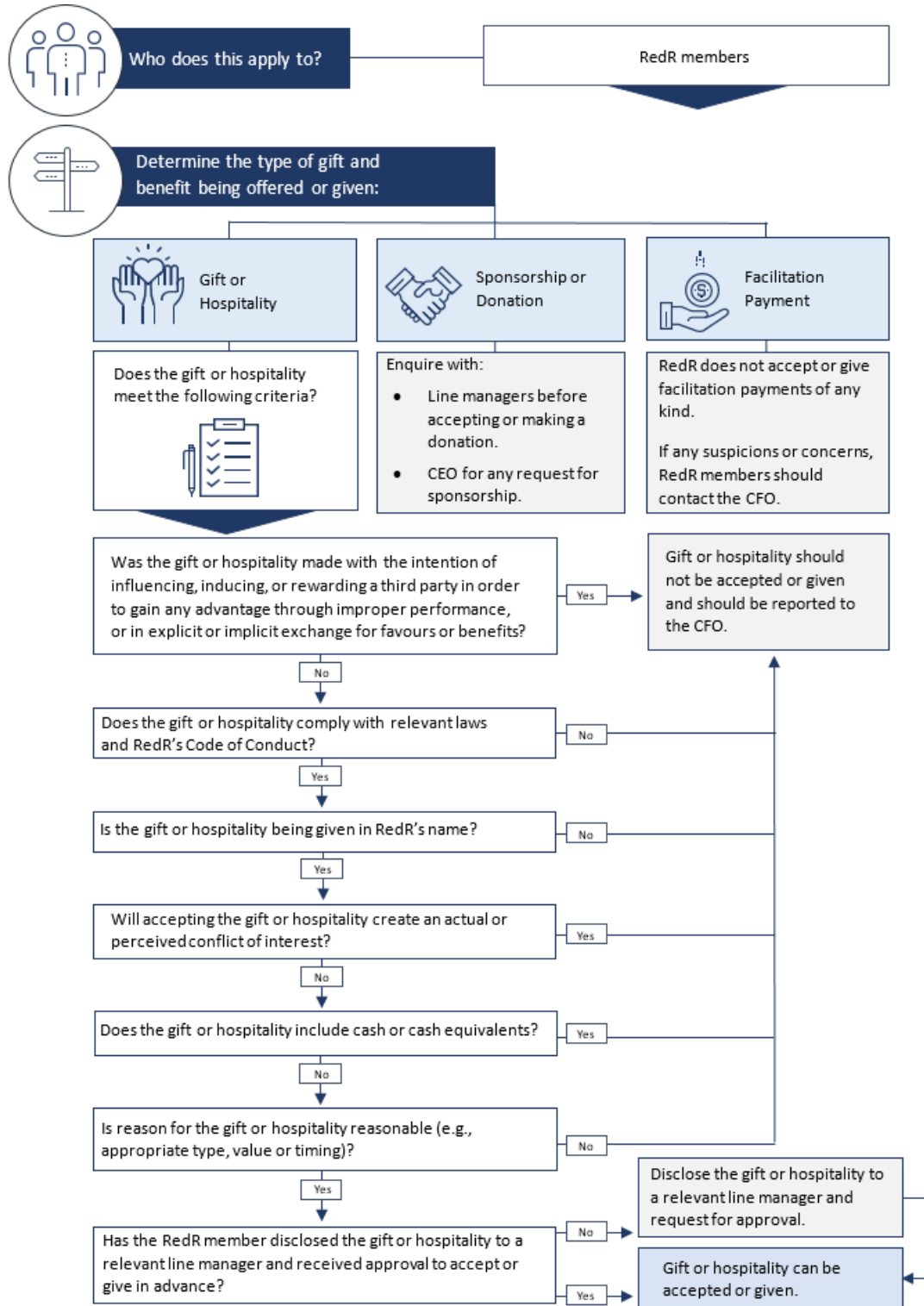
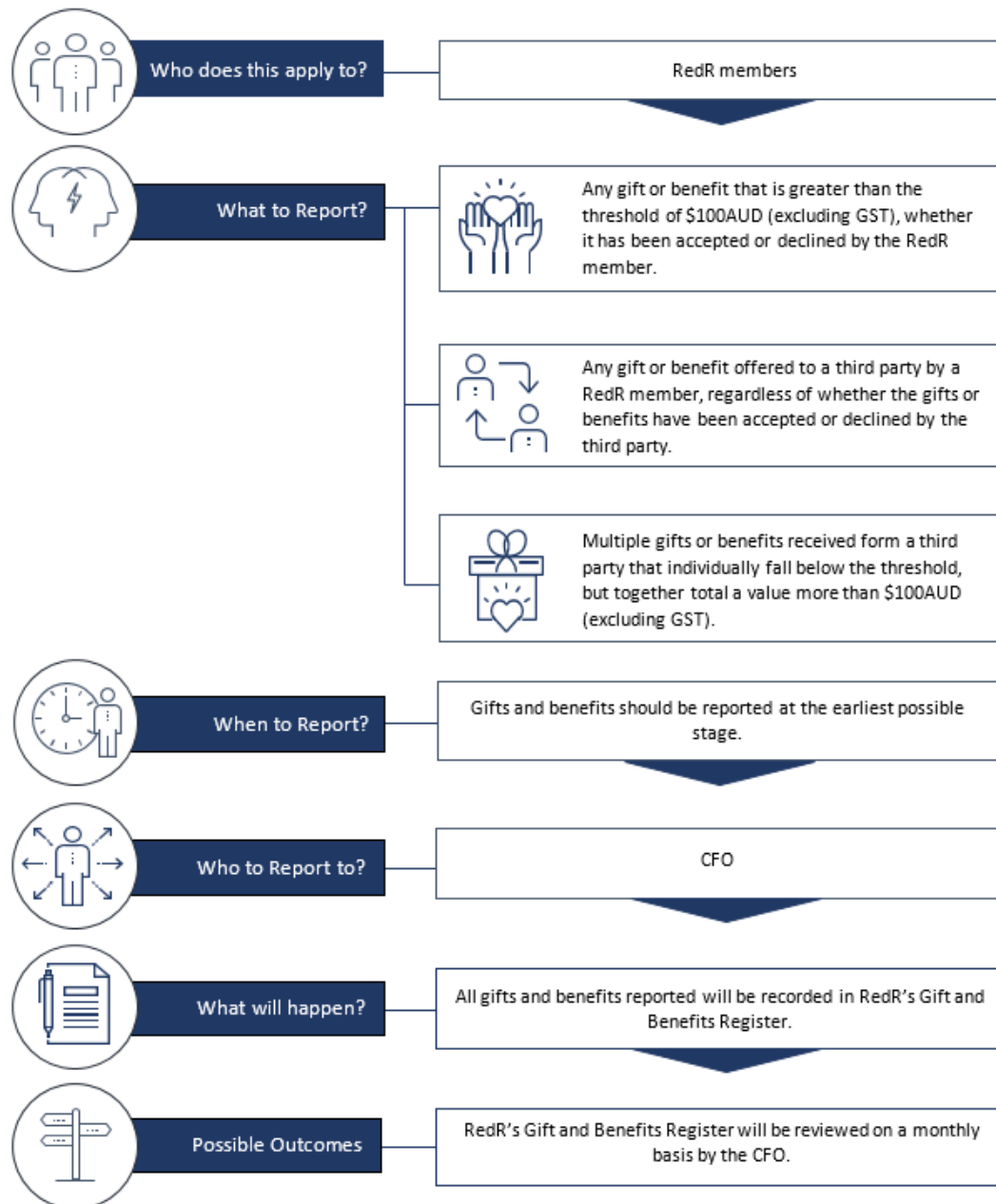


Diagram 2: Gifts and benefits Reporting Process



## 9. Definitions

<b>A Conflict of Interest</b>	Is a situation where an individual has competing interests or loyalties. A conflict of interest arises when an individual has secondary interests which could improperly influence their work or performance.
<b>A gift or hospitality</b>	<p>Is any item or service offered to and/or accepted by a RedR member from a third party or offered to and/or provided to a third party by a RedR member in the course of duty. This may include, but is not limited to:</p> <ul style="list-style-type: none"><li>• Gift Cards.</li><li>• Free or discounted travel and accommodation.</li><li>• Meals or other hospitality.</li><li>• Wine, beer or other alcoholic beverages.</li><li>• Luxury items, such as jewellery, watches or other accessories.</li><li>• Entertainment.</li><li>• Free use of facilities, such as gyms or holiday homes.</li></ul> <p>Low valued items such as small boxes of chocolates or promotional items included in conference packages are excluded from this policy</p>
<b>A lavish gift or benefit</b>	Is a type of gift or benefit that is considered disproportionate to and/or potentially inappropriate (valued at over \$100) given the circumstances in which gift or benefit is being offered/accepted.
<b>A routine gift or benefit</b>	Is a type of gift or benefit that is of small value, however, occurs periodically, such as daily coffees or lunches
<b>Facilitation payments</b>	Are small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in Australia but are common in some other jurisdictions in which RedR operates.
<b>Kickbacks</b>	Are typically payments made in return for a business favour or advantage
<b>Donation</b>	Is a voluntary contribution or gift that does not provide material benefit to the donor.
<b>Sponsorship</b>	Is a benefit that is given to support an individual, organisation or activity.
<b>Third Party</b>	Any individual or organisation that RedR members may encounter during the course of their work for RedR. This applies to actual and potential customers, suppliers, distributors, business contacts, agents, advisers, government and public bodies, including their advisors, representatives and officials, politicians and political parties.

# Gifts and Benefits Policy

## 10. Related Policies and Documents

RedR Code of Conduct  
RedR Anti-Bribery, Fraud and Corruption Policy  
RedR Fraud Control Strategy  
RedR Ethics (Whistleblowers) Policy  
RedR Staff Terms and Conditions  
RedR Conflict of Interest Policy

## 11. Document Control

<b>Reviewed by:</b>	Chief Financial Officer
<b>Approved by:</b>	CEO
<b>Review date:</b>	October 2023
<b>Next review:</b>	October 2026
<b>Distribution:</b>	Internal only
<b>Version number</b>	2.0

### Statement to be signed by all personnel

I declare that I have received, read, understood and agree to abide by the Gifts and Benefits Policy.

I understand that this policy is an integral part of my employment contract and conditions of service with RedR Australia. I understand that any breach of this policy could result in disciplinary procedures, including formal warning, suspension from duties and/or summary dismissal from my role with RedR Australia.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_