



Anti-Bribery, Corruption, Gifts and Benefits

Overview

At the SGCH Group, we are committed to acting with accountability and integrity. Trust and honesty are some of our core values and we are committed to ensuring that our people and associates understand that they must act ethically, professionally and legally. This policy outlines our zero tolerance approach to bribery and corruption, and how we will manage gifts and benefits provided, offered or received.

Scope

This policy applies to all employees, directors, officers, volunteers (our people) as well as agents and contractors (our associates) of St George Community Housing and its subsidiaries (we, our and us).

Purpose

The purpose of this policy is to:

- Establish clear standards to make sure that our people and associates know they must not engage in, or encourage corruption, and that bribes are not offered, given or received on our behalf; and
- Ensure that gifts/benefits received by our people are appropriate and are managed properly and reported.

Definitions

Bribes and Bribery

Bribery is when a person provides, offers, promises, gives, accepts, requests, or authorises a benefit, with the intention of improperly influencing another person to obtain or retain business or a business or personal advantage (for themselves or another person). A benefit is not limited to money or other property. Bribery includes benefits that are offered, provided, promised, given, accepted or requested directly as well as benefits caused to be offered, promised or made indirectly (e.g. through a friend or family member).

Corruption

Any dishonest, fraudulent, deliberate or intentional wrongdoing with an improper purpose or motivation, or abuse of power for personal gain.

Facilitation payments

Facilitation payments are unofficial payments made for the purpose of speeding up or securing the performance of routine government action such as issuing permits or other non-discretionary duties.

Gift/benefit

Gift/benefit means:

- the transfer of goods, assets or another benefit without payment or compensation, or for compensation substantially less than full value; or



- a loan of goods or assets made on a permanent, or indefinite, basis, or
- a series of gifts from the same person or source (or parties related to that person or source),

with a value of more than \$30, received by or given to people when they are acting in their official capacity.

For the purposes of this policy, gifts and/or benefits include physical items of lasting value (e.g. goods) and items that have no lasting value (e.g. hospitality).

Gifts/benefits do not include any of the following:

- Any gift/benefit given to, or received by, people under an appropriately approved company health and well-being program, or rewards and recognition program.
- Complimentary attendance at events where we are a sponsor or where people are speaking.
- Working lunches or hospitality included with professional development activities.

Political donation

A political donation is a gift made to, or for the benefit of, a political party, elected member, candidate, group of candidates, associated entities or third parties.

Examples of political donations could include:

- Annual or other subscriptions paid to a political party by a member of a party, or by a person or entity for affiliation with the party.
- A contribution, entry fee or other payment allowing a person to participate in, or benefit from, a political fundraising venture or function. Purchasing tickets to events hosted by a political party or candidate, making winning bids at a fundraising auction or buying raffle tickets at such events are also common examples of making political donations at a fundraiser.
- A monetary or non-monetary gift (including property) to a political party, branch of a political party, politician or candidate.
- The provision of a service at no charge or at a discounted rate to a political party, branch of a political party, politician or candidate.

If there is any doubt about whether a payment is a political donation, the matter should be referred to the General Counsel for approval.

Policy

Our people and associates must not:

- Engage in or encourage corruption or allow others to do so on our behalf.
- Provide, offer, promise, give, accept, request, or authorise a bribe, whether directly or indirectly.
- Provide, offer, promise, give, accept, request, or authorise a facilitation payment, whether directly or indirectly.



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- Provide, offer, promise or give gifts or hospitality to elected officials or public servants, whether directly or indirectly.
 - Make political donations or authorise political donations to be made on our behalf.

Our people must not:

- Accept gifts/benefits that may influence, or appear to influence, their decision making or impact their integrity in performing their duties with us.
- Seek gifts/benefits for themselves or their associates in connection with their role with us.
- Under any circumstances, accept financial gifts (including cash, cheques, gift vouchers) in relation to their role.
- Accept a gift/benefit where a reasonable person would see this as influencing our/their decisions, actions or conduct.
- Accept a gift/benefit (including hospitality) from a third party involved, directly or indirectly, in an ongoing tender process in which SGCH is involved as either a potential proponent or as the procuring party is obtained. This prohibition applies for a period beginning one month before the commencement of tender process and ending one month after conclusion of the process (Tender Prohibition Period).

Gifts and benefits

Our people must report any gifts/benefits they are offered or received to the relevant Executive within 5 business days of the gift/benefit being offered to them and, in the case of hospitality offered to employees (other than to an Executive or the CEO), prior to the acceptance of the hospitality event.

Except in the case of gifts/benefits offered or received during a Tender Prohibition Period which may not be accepted or kept in any circumstances, Executives are responsible for determining whether it is appropriate to accept or keep gifts/benefits and any conditions attached to the gift/benefit being accepted.

If accepting or keeping the gift/benefit is inappropriate, but not accepting it or returning it would cause offence, the Executive will determine the best approach for dealing with the gift/benefit. The approach may include raffling or donating the item.

Details of gifts/benefits offered to and received by our people must be provided to the Executive Officer to the CEO within 10 business days of them being received. The Executive Officer to the CEO is responsible for registering all gifts/benefits in the Gifts Register.

The Gifts Register will be submitted to the Audit and Risk Committee for noting within the ordinary cycle of those meetings. If everything is in order, the Audit and Risk Committee will make a recommendation to the Group Board that it note the Gifts Register at the following Group Board meeting.

The policy is not intended to prevent appropriate and proportionate relationship building activities with stakeholders. For example, it may be appropriate to accept reasonable hospitality (such as a new year party invitation) from a current service provider who is not currently tendering competitively for new work with us. However, in line with the definition of “gift/



benefit”, the hospitality will be recorded in the gifts register in accordance with this policy and must be pre-approved by the relevant Executive.

Honorariums

On occasions our people may be invited to speak at functions, conduct presentations, write articles or participate in committees and may be offered or provided with an honorarium or other form of compensation or gift for the particular service performed. Approval to retain that honorarium should be obtained from the relevant Executive/CEO.

Assessing bribery and corruption risks of partners and contractors

Prior to commencing a relationship with a partner or contractor, we will undertake appropriate due diligence, including assessing the risk of bribery and corruption related to that entity.

Reporting concerns

Our people and associates have a responsibility to report any breaches of this policy.

Concerns about bribery and corruption can be reported under our Whistleblower Policy. Further details about reporting, confidentiality and protections for eligible whistleblowers are outlined in our Whistleblower policy.

Compliance

If our people are found to be involved in, or conspiring to be involved in bribery and corruption, they will face disciplinary action in accordance with our Disciplinary Action Policy.

If our partners or associates are found to be involved in, or conspiring to be involved in bribery and corruption, we will take action in accordance with the relevant contract.

Questions about this policy

Questions about this policy should be directed to the General Counsel.

Relevant laws, regulations or standards

- [Electoral Funding Act 2018 \(NSW\)](#)
- [Commonwealth Electoral Act 1918 \(Cth\)](#)
- [Criminal Code Act 1995 \(Cth\)](#)
- [Australian Charities and Not-for-profits Commission \(ACNC\) Governance Standards](#)

Policy information

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Approval required:	Board