

## Directors Gift Policy

<b>Policy Statement:</b>	<p>A Director must not solicit gifts, hospitality, benefits, services or favours.</p> <p>In the course of doing business as a Director of RSL LifeCare Limited (RSLLC), sometimes gifts, hospitality and similar benefits may be offered as a business courtesy or inducement. This document outlines RSLLC's policy on these items and seeks to remove uncertainty and avoid any potential misunderstanding and embarrassment.</p>
<b>Purpose:</b>	The purpose of this policy is to assist Directors of RSLLC to effectively identify, disclose and manage risks in relation to any gifts received in their role with RSLLC.
<b>Objective:</b>	RSLLC's board aims to ensure that Directors are aware of their obligations to manage and disclose any gifts received in the course of their duty with RSLLC.
<b>Scope:</b>	This policy applies to Directors of RSLLC.
<b>Principles:</b>	<p><u>What is a gift?</u></p> <p>For the purpose of this policy, a gift is any good, form of hospitality or similar benefit which has a monetary value or worth, or other advantage or privilege attached and is derived as a result of an actual or potential RSLLC business connection.</p> <p>Examples could include:</p> <ol style="list-style-type: none"> <li>1. a meal at a restaurant;</li> <li>2. tickets to attend a sporting or cultural event;</li> <li>3. conference or course registration and/or associated travel and accommodation;</li> <li>4. gifts for events such as birthdays, Christmas or similar;</li> <li>5. flowers or chocolates;</li> <li>6. money or cash or kind (including gift vouchers);</li> <li>7. souvenirs, promotional samples or corporate merchandise;</li> <li>8. special personal discounts; or</li> <li>9. any item or benefit providing personal gain or gratification to which could be seen to compromise either the Director or RSLLC.</li> </ol> <p>When considering whether or not to accept a gift, a reasonable person test should be applied. If there is uncertainty as to the appropriateness of a gift, confirmation should be sought from the Chair or Company Secretary. before a gift is received or accepted..</p> <p><u>Types of Gifts – Prohibited Gifts</u></p> <p>Gifts that are intended to influence or that may be considered by a reasonable person to have the potential to influence an individual in the conduct of his/her duties or responsibilities to RSLLC are prohibited.</p> <p>Accepting a prohibited gift carries a greater risk that a perceived or actual conflict of interest may exist or arise between the recipient and the gift giver. Refer also to the definition of a conflict of interest in the Conflicts of Interest Policy (GP 02). In addition, the provision of gifts of significant value could result in RSLLC being in breach of its obligation to only use its assets for its charitable purpose.</p> <p>Gifts of cash or items readily convertible to cash (vouchers, shares) are prohibited.</p>

**Policy**

**GP13 Directors Gift Policy**

Approval Date

17 June 2021

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Approved by

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Policy Owner

RSL LifeCare Board

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	<p><u>Types of Gifts – Nominal Gifts</u></p> <p>A Director may accept an occasional gift of nominal value which is offered in accordance with social or cultural practice.</p> <p>Gifts of nominal value are valued at less than \$150..</p> <p><u>Types of Gifts – Reportable Gifts</u></p> <p>Reportable gifts are those estimated to be valued above \$150. Receipt of multiple gifts of less than \$150 given on a frequent basis, are also reportable, for example repeated meals at restaurants or tickets for sporting matches every weekend.</p> <p>If offered a reportable gift, Directors should politely refuse and explain they are not able to accept the gift as it could create a perceived conflict of interest or be seen as an inducement to bribe a Director. However, in some circumstances a gift is made without being first offered (for example through the mail or delivery service) or it may not be appropriate in a public setting to decline the gift.</p> <p>Any gifts above \$150 or frequent gifts below \$150 must be notified to the Chair and Company Secretary using the attached form. The Company Secretary will maintain a Directors Gift Register that will be reviewed by the Audit &amp; Risk Committee twice a year.</p>
<p><b>Policy Review:</b></p>	<p>This policy must be reviewed the earlier of:</p> <ul style="list-style-type: none"> <li>• a significant change in relevant legislation</li> <li>• in the event of a significant incident concerning the subject matter of the policy</li> <li>• around the one-year anniversary of the last review.</li> </ul>
<p><b>Related Documents and References:</b></p>	<ol style="list-style-type: none"> <li>1. Conflicts of Interest Policy (GP 02)</li> <li>2. Fraud Prevention Policy (GP 03)</li> <li>3. Board Code of Conduct (GP 05)</li> </ol>

1. Format for Directors Gift Register

Date	Offeror	Board Member to the whom the gift was offered?	Description of gift offered	Cultural, historic or other significance	Was the gift accepted or declined?  If accepted, record the legitimate business reason (benefit)	If the gift was accepted:  <ul style="list-style-type: none"> <li>How is it to be disposed of?</li> <li>Who authorised this decision?</li> </ul>

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