

# GIFTS, HOSPITALITY AND ENTERTAINMENT POLICY

## 1. Overview

Team Global Express (TGE) is committed to ensuring that our business dealings are conducted legally, ethically and responsibly.

The purpose of this Policy is to outline TGE's position on, and the requirements in respect of, the giving and receiving of gifts, hospitality and entertainment.

For the purposes of this Policy, TGE means Team Global Express, comprising Australian Parcels Group Pty Ltd, NZ Logistics Holdings Limited and each of their subsidiaries.

## 2. Application

This Policy applies to directors, employees, labour hire workers, agents, consultants and contractors working for, or on behalf of, TGE (**TGE personnel**).

## 3. Principles

Consistent with our commitment to ensuring that our business dealings are conducted legally, ethically and responsibly, TGE prohibits the giving or receiving of gifts, hospitality and entertainment that could, or be perceived to, affect a party's impartiality, influence a business decision or obtain an improper benefit or advantage.

The giving or receiving of gifts, hospitality and entertainment must be for legitimate business purposes and appropriate in the circumstances.

The giving or receiving of gifts, hospitality and entertainment must comply with this Policy.

TGE personnel must ensure that the giving or receiving of gifts, hospitality and entertainment:

- is for legitimate business purposes;
- is not solicited;
- is not made, or perceived, to influence a business decision or an intention to improperly secure a personal or business benefit or advantage;
- does not occur during a bid or tender process or during a contract negotiation;
- is reasonable and proportionate in all the circumstances; and
- is transparent, declared and pre-approved (where required in accordance with this Policy).

## 4. Gifts

The giving or receiving of a gift must be in accordance with this Policy.

### What is a gift?

Gifts include, but are not limited to:

- something of value, including cash, vouchers, services, flowers, chocolates;
- merchandise, including company branded clothing, gift baskets, pens, collectables; and

- travel or accommodation.

### **Prohibited gifts**

The following gifts are prohibited and must never be given or received by TGE personnel, irrespective of value:

- cash or cash equivalent (eg. pre-paid VISA card);
- gifts to government officials other than business courtesies during a meeting; and
- inappropriate items (eg. gifts or activities with sexual content).

Where possible, prior to receiving gifts, hospitality, and entertainment, TGE personnel should notify the customer or supplier of TGE's requirements regarding prohibited gifts. Prohibited gifts must be declared in accordance with section 8 of this Policy and returned to the provider of the gift. Where it is not reasonably practicable to return the gift, or where exceptional circumstances exist, advice should be obtained from the Chief Legal Officer.

### **Excluded gifts**

You may give or receive gifts from TGE personnel as long as the gifts are not expensed to TGE.

Gifts of up to A\$150 to TGE personnel for milestone occasions, including the birth of a baby, a wedding, a serious illness and farewell are permitted with the prior approval of the relevant manager.

You must not give or receive alcohol from TGE personnel in the workplace and gifts should be tasteful and appropriate in the workplace context and not cause embarrassment or offence.

### **Declaration of gifts**

You must declare the giving or receipt of any gift, including those with a combined value of more than A\$150 per annum within five business days by completing a declaration form at <https://tollglobalexpress.stoplilereport.com/>.

You are not required to declare excluded gifts (refer above) or the giving or receiving of company branded merchandise with a value of less than A\$150 per annum.

### **Approval of gifts**

You must obtain the pre-approval of the Chief Legal Officer in respect of gifts you give or receive with a combined value of more than A\$150 per annum.

### **Ownership of gifts**

Unless approval has been given by the Chief Legal Officer, gifts are received on behalf of TGE and are not to be used by you personally. If the gift is not appropriate to be received on behalf of TGE, it must be returned to the provider of the gift.

## **5. Hospitality**

The giving or receiving of hospitality must be in accordance with this Policy.

### **What is hospitality?**

Hospitality includes, but is not limited to, meals and drinks.

### **Declaration of hospitality**

You must declare the giving or receipt of any hospitality with a value of more than A\$250 per head by completing a declaration form at <https://tollglobalexpress.stoplilereport.com/>.

You are not required to declare the giving or receiving of hospitality of less than A\$250 per head. This level of hospitality must not exceed four occasions within 12 months per customer or supplier without the prior approval of the Chief Legal Officer.

### **Approval of hospitality**

You must obtain the pre-approval of the Chief Legal Officer in respect of the giving or receiving of hospitality that is greater than A\$500 per head (including the value of entertainment).

## **6. Entertainment**

The giving or receiving of entertainment must be in accordance with this Policy.

### **What is entertainment?**

Entertainment includes, but is not limited to, tickets to sporting, music or cultural events and may be combined with hospitality.

### **Excluded entertainment**

The following entertainment is excluded entertainment for the purposes of this Policy and does not require pre-approval or a declaration:

- entertainment or combined entertainment or hospitality that only involves TGE personnel. Please refer to the Travel and Expense Management Policy and Expense Management Standard for guidance on internal events; and
- industry events, seminars, educational or professional development events that have a legitimate business purpose or educational benefit. Attendance at such events should be discussed with your manager and appropriately documented.

### **Declaration of entertainment**

You must declare the giving or receipt of any entertainment with a value of more than A\$250 by completing a declaration form at <https://teamglobalexpress.stoplilereport.com>

### **Approval of entertainment**

You must obtain the pre-approval of the Chief Legal Officer in respect of the giving or receiving of any entertainment with a value that is greater than A\$500 per head (including the value of hospitality).

### **Accommodation and transport in connection with hospitality and entertainment**

Travel expenses and accommodation for third parties must be paid for by those third parties. TGE personnel must not accept travel or accommodation from third parties unless pre-approval of the Chief Legal Officer is obtained.

## **7. Government Officials**

The giving and receiving of gifts, hospitality and entertainment to government officials is prohibited and restricted to business courtesies only. Advice should be sought from the Chief Legal Officer prior to the proposed giving or receipt of any business courtesies.

## **8. Declaration of Gifts, Hospitality and Entertainment**

You must declare and seek pre-approval for the giving or receiving of gifts, hospitality and entertainment in accordance with this Policy at <https://teamglobalexpress.stoplينerreport.com>

## **9. Breach of this Policy**

All TGE personnel are responsible for understanding and complying with this Policy.

Any suspected breach of this Policy will be reviewed and appropriate disciplinary and remedial action taken in respect of confirmed breaches. A breach of this Policy may be regarded as misconduct and may lead to disciplinary action up to and including termination of employment or engagement.

In the event TGE personnel are concerned there are circumstances preventing compliance with this Policy, advice should be immediately sought from the Chief Legal Officer.

## **10. Review of this Policy**

This Policy will be reviewed periodically, at intervals of at least two years to ensure that it is operating effectively and remains consistent with TGE's objectives.

## **11. Further Information**

For further information contact your Legal Team representative. This document can be found on the Group Policy intranet page.

## **12. How to contact us**

Attention: Company Secretary

Team Global Express

Level 15, 380 St Kilda Road

Melbourne VIC 3004 Australia

Telephone: 13 15 31 (Australia)

0800 865 569 (New Zealand)

Email: [cosec@teamglobalexp.com](mailto:cosec@teamglobalexp.com)