

Gifts and Entertainment (Giving and Receiving) Policy

1. Purpose and Scope

In keeping with our purpose, vision and values, it is important that team members act with professionalism and integrity in all of our business dealings and commercial relationships. Accepting or being influenced by gifts or benefits from a current or prospective retailer, supplier or someone seeking to do business with the group, is a conflict, compromises Fagg's Group reputation and depending on the context, could also be unlawful.

This policy outlines the guidelines and expectations for giving and receiving gifts and entertainment within Fagg's Group Pty Ltd. It applies to all employees, contractors, clients, vendors, and business partners. The underlying principle is **TRANSPARENCY** and keeping the business informed.

2. Definitions

- ❖ Gifts: Items of value given or received without an explicit business purpose.
- ❖ Entertainment: Social activities or events that are directly and/or not directly related to business discussions.
- ❖ Stakeholders: Employees, individuals or entities with whom Fagg's Group has business relationships.

3. Permissible and Prohibited Activities

- ❖ Permissible: Small tokens of appreciation, such as branded merchandise, of a value less than \$50.
- ❖ Prohibited: Cash, cash equivalents, extravagant gifts, and any gifts that could be perceived as influencing business decisions.

4. Thresholds and Limits

- ❖ Gifts below \$50: No pre-approval required.
- ❖ Gifts above \$50: Require approval from either the Fagg's Group General Manager /Executive Team or P&C Dept.

5. Reporting Requirements

ALL supplier provided gifts, samples, free products, giveaways, entertainment offers (tickets to events), must be declared to the Group General Manager /Executive Team or P&C Dept. Employees must report any gifts or entertainment received or given above \$50 within 1 business day.

6. Approval Process

Gifts or Entertainment received as an employee of Fagg's Group must be reported to the Fagg's Group Executive team within 24hrs of being received.

A webform is available on the Fagg's Group Intranet (link is listed on the Menu Bar at the top of the home page) to enable review by the General Manager/Executive Team or P&C Dept. Information including, value of gift/entertainment and gifting party should be disclosed via this form.

Approvals will be evaluated based on ethical considerations and potential conflicts of interest.

7. Conflicts of Interest

Employees must assess whether the acceptance of gifts or entertainment could create a conflict of interest or compromise their judgment. If a conflict of interest is identified, it must be reported to our P&C Grp for resolution. A conflict of interest may also exist where a team member has an interest or activity that creates an actual or potential conflict with the interests of Fagg's Group.

Examples of situations where a conflict may arise include, but are not limited to, where:

- ❖ A team member, or a friend, relative, partner or associate has an undisclosed commercial or financial interest in, or relationship with a wholesaler, retailer, supplier, someone Fagg's Group may do business with, or someone who competes with Fagg's Group
- ❖ A team member uses their position or engagement with Fagg's Group to obtain an undisclosed benefit for them self or someone else
- ❖ A team member engages in activities, whether during or outside business hours, that places the interests or reputation of Fagg's Group at risk
- ❖ During their ordinary working hours (or the time a team member is engaged to perform work for Fagg's Group, as relevant), a team member does not devote their full time and attention to their tasks or duties but rather undertakes activities that result in personal gain or a benefit

8. Entertainment Expenses

Reasonable entertainment expenses directly related to business and business discussions are permissible. Entertainment expenses must be documented, including the purpose and attendees, for reimbursement. Employees **MUST** seek pre-approval from their immediate supervisor before engaging in client entertainment.

9. Entertainment Conduct & Behaviour

It is acceptable for team members to participate in appropriate business-related functions, such as a networking lunch with a supplier or entertaining a customer, with their line manager's prior consent. Such activities should have an underlying business purpose and not be frequent. During any activity of this nature (that is, where the team member attends in their capacity as a team member, whether during or outside business hours), team members are expected to act consistently with Fagg's Group Appropriate Workplace Behaviours policy (including the consumption of alcohol) and not engage in any behaviour that may reflect negatively, or damage the reputation or standing of Fagg's Group.

When a Fagg's Group team member hosts a breakfast, lunch, dinner or event (e.g., football), the provision of meals and drinks (alcoholic etc.) to a customer should be limited to \$50 per person. The team member is required to secure endorsement from his/her line manager in advance. The serving of alcohol needs to be appropriate and in accordance with our Company policies and in moderation. Alcoholic drinks should not extend to the provision of cocktails or mixed drinks.

10. Enforcement and Consequences

Violations of this policy may result in disciplinary actions, ranging from counselling and retraining to more severe consequences. Repeated violations or severe breaches is a serious matter that may result in disciplinary action, up to and including the termination of employment or engagement.

11. Training and Communication

All employees will receive training on this policy during their onboarding process. Periodic refresher training will be provided to ensure understanding and compliance.

12. Review

This policy will be reviewed annually to ensure its relevance and effectiveness.

By signing this document, I acknowledge that I understand the Policy and Procedures as stated above:

NAME: SIGNATURE.....

DATE.....