



Entertainment & Gifts Policy

| | |
|---------------------|----------------------------|
| Last Modified | 5 December 2008 |
| Next due for review | 31 December 2009 |
| To be reviewed by | Board Governance Committee |
| To be approved by | Trustee Board |
| Number of Pages | 5 |

Table of Contents

- 1. Purpose of Policy 3
- 2. Guidelines & Procedures..... 3
 - 2.1 Receiving Gifts..... 3
 - 2.2 Acceptance of Gifts..... 3
 - 2.3 Recording of Gifts..... 4
 - 2.4 Giving of Gifts 4
- Document History 5
- Relevant Documents 5

1. Purpose of Policy

This policy seeks to provide specific guidance for Responsible Officers and staff members of the Fund on the avoidance of conflicts of interests in relation to the acceptance of entertainment or gifts. It must be read in conjunction with the *Responsible Officer Probity Plan* and is subject to the provisions in section 7 of the Plan regarding conflicts of interest.

It is acknowledged that it is a commonly accepted business practice to be offered entertainment, including meals, or gifts as part of a business relationship. Such benefits can, on the other hand, lead to at least perceptions of bias or a conflict of interest and possibly detract from the openness and transparency desired by Christian Super. This policy aims to address those concerns by establishing a mechanism and guidelines to avoid perceptions of conflict and provide greater transparency.

2. Guidelines & Procedures

2.1 Receiving Gifts

A Responsible Officer or staff member shall not:

- solicit any gift or benefit from any external party in connection with their Christian Super functions or duties
- accept any gift or benefit, if the gift or benefit could be perceived to create or actually creates a conflict of interest in the Responsible Officer or staff member's performance of their functions or duties;
- accept any gift of money or benefit by way of loan, or similar funding, for any functions or duties performed or not performed;
- attend any conference, seminar, function or event as the guest of any external party unless there is a material benefit to the Fund. Such a benefit could include professional development or networking opportunities..

2.2 Acceptance of Gifts

Other than gifts specified in 2.1 above a Responsible Officer or staff member may accept a gift or benefit provided that:

- In the case of a gift or benefit with a value of more than \$300 this must be disclosed on a publicly available Benefits Register and may only be accepted following the prior approval of two Trustees;
- When a Responsible Officer or staff member receives a gift or benefit with a value of less than \$300 but more than \$100 this must be disclosed on a publicly available Benefits Register;
- In the case of a gift or benefit with a value of less than \$100 this may be accepted without the need for disclosure except where the cumulative value of gifts or benefits from a single source during a year exceeds \$300. In this situation the total cumulative value of the benefit must be disclosed on a publicly available Benefits Register.

Where the benefit received is in the nature of a business lunch or similar hospitality not associated with any other benefit or entertainment no disclosure shall be required.

Where a member of staff is uncertain whether a particular gift exceeds a valuation threshold the details should be forwarded to the CEO for review. In the case of Responsible Officers the Board Governance Committee shall make such a determination.

2.3 Recording of Gifts

Any Responsible officer or staff member receiving or giving a gift with a value in excess of \$100 shall advise the Compliance Officer of the nature and value of the gift within fourteen days of receipt or giving of the gift. The Compliance Officer will update the Benefits Register and ensure that this register is made publicly available on the Fund's website.

2.4 Giving of Gifts

Gifts other than those of nominal value (not more than \$100) shall not be given to any external party without prior approval of the CEO or Board Governance Committee and will also be recorded on the Gift Register.

Document History

1 November 2008 Drafted by Peter Murphy
5 December 2008 Approved by Trustee Board

Relevant Documents