

GIFTS AND HOSPITALITY PROCEDURE AND FAQS

Purpose

Tabcorp is committed to complying with the law and ensuring the highest standard of honesty and integrity in all its activities.

This Gifts and Hospitality Procedure and FAQs (**Procedure**) supports our [Anti-Bribery and Corruption Policy](#) and sets out the circumstances where gifts or hospitality can or can't be offered or accepted, and when and how an offer or receipt of a gift or hospitality must be entered into the [Gifts and Hospitality Register](#).

Who this procedure applies to

This procedure applies to anyone who works at or for Tabcorp, including all employees and contractors (**Team Members**).

What are gifts and hospitality?

These terms are to be interpreted broadly.

Gifts may include any tangible item of value, service of value, favour that enhances a person materially, benefit or thing of value, including cash, item, service, favour, benefit or thing given at less than market value.

Hospitality may include any meal, travel, entertainment, including attendance at sporting and other events, accommodation, vouchers or certificates which are capable of being exchanged or redeemed for corporate hospitality items.

When is it ok to give or receive a gift or hospitality?

Giving and accepting gifts or hospitality is a common and legitimate aspect of building and maintaining business relationships. However you must not give or accept gifts and hospitality in connection with your role at Tabcorp that may compromise or appear to compromise your integrity and objectivity in performing your duties, or cause or appear to cause a conflict of interest.

The principles in the following table can be used as a guide to help you determine if it is suitable to accept, or offer, a gift or hospitality.

Compliance with company policies is a condition of employment at Tabcorp. Tabcorp may vary its policies at its discretion from time to time, without prior notice or compensation to employees or contractors, and the content of this policy is not incorporated into any contract of employment or engagement. This policy is current at the date of printing.

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Is the aim of the offer general relationship-building only?

It's generally acceptable to give or accept a gift or hospitality where the aim of the offer is for general relationship-building purposes, including for marketing purposes, team building, general business or similar purposes (such as a working lunch).

Is there an expectation created by the giver?

If there's an expectation created by the giver and/or a conflict of interest, this may be an attempt to improperly influence the recipient in the performance of their role or duties. You must not accept or make such an offer.

Is the value of the offer proportional?

The value of an offer of a gift or hospitality must be proportional and appropriate to the nature of the relationship and the purpose of the offer. If the value of an offer is excessive relative to the nature of the relationship and purpose of the offer, you must not accept or make such an offer.

Is the offer given in an open and transparent manner?

All offers of gift and hospitality must be made in an open and transparent manner, and where required, must be recorded in the Gift and Hospitality Register.

Does the offer involve cash, loans, or an equivalent to cash?

If the offer includes cash, loans or an equivalent to cash (such as gift certificates), you must not accept or make an offer.

Note that with your General Manager's approval, it is acceptable to pay for bets in a horse race at a formal Tabcorp event (such as when hosting guests in the Tabcorp marquee during Spring Racing Carnival).

Does the offer involve a public official?

Additional caution must be exercised when there is any offer of gift or hospitality involving a public official. Your General Manager must give approval before you accept or make an offer involving a public official.

Is the offer in breach of any law, regulation or rule?

If an offer is in breach of any law, regulation or rule, you must not accept or make such an offer.

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Are we negotiating a commercial deal with the other party?

If the other party is in a current or anticipated tender or bid process with Tabcorp, or is in negotiations with Tabcorp relating to any active commercial opportunity, you must not accept or make an offer.

Is the other party a competitor of Tabcorp?

If the other party is a competitor of Tabcorp or employed by or otherwise directly connected to a competitor of Tabcorp, you must not accept or make an offer.

Is the other party involved in inappropriate conduct?

If the other party is involved in conduct of an illegal, sexual, offensive, derogatory, demeaning, discriminatory or otherwise inappropriate nature, and you have knowledge or reasonable suspicion of that conduct, you must not accept or make an offer.

Has there been a regular giving or receiving of gifts or hospitality involving the other party?

When there has been a regular giving or receiving of gifts or hospitality (that is, more than twice in one year) with the same party, where the gifts or hospitality are valued over \$200, you must not accept or make additional offers involving that party.

Have you solicited gifts or hospitality?

You must not solicit (that is, ask for) gifts or hospitality.

Who do I contact if I'm unsure about giving or receiving a gift or hospitality?

If you are unsure about giving or receiving a gift or hospitality, you should email GiftsRegister@Tabcorp.com.au for guidance.

Any gift or hospitality offered or received that's in conflict with this procedure must be reported to GiftsRegister@Tabcorp.com.au. A member of the Group General Counsel team will determine whether the gift or hospitality may be accepted or must be returned to the offeror, or whether other action must be taken.

When do I need approval and when must I enter a gift or hospitality into the Register?

Tabcorp maintains a Gift and Hospitality Register to ensure transparency and integrity in our dealings.

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The flowchart set out in the Appendix outlines:

- when, and from whom, you must seek approval prior to accepting or making an offer of a gift or hospitality; and
- when you must enter an offer of gift or hospitality in the Gifts and Hospitality Register.

Note that relevant offers (as outlined in the flowchart) must be recorded in the Gift and Hospitality Register *even if* they aren't accepted. The Gift and Hospitality Register will be monitored and entries may be subject to internal and external review.

Exceptions to the Gifts and Hospitality Register

The Tabcorp Corporate Hospitality team may choose to maintain separate records of hospitality given and received in the proper course of their function, including the receipt or provision of entertainment at a corporate marquee during the spring or autumn racing carnivals or similar major event. Hospitality events that are recorded in separate records do not need to be recorded in the Gifts and Hospitality Register provided the separate records capture sufficient detail, including the date and purpose of an event and the attendees, and the attendees have been approved by the Managing Director & CEO or his/her delegate, or a member of the ELT.

What will happen if I breach this procedure?

Any breaches of this procedure or the [Anti-Bribery and Corruption Policy](#) by team members will be treated seriously and may result in disciplinary action in accordance with that policy.

Policies Control

Current from	19 December 2019
Replaces version dated	N/A
Approved By	Managing Director & Chief Executive Officer

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WHAT TO DO WITH OFFERS OF GIFTS OR HOSPITALITY



HAVE YOU RECEIVED, OR DO YOU INTEND TO MAKE, AN OFFER OF A GIFT OR HOSPITALITY?

YES

IS THIS AN ALLOWED GIFT?

CHECK

- To determine whether it is **ok** to **accept** or **make** an offer of a gift or hospitality, you can use the **guidance questions** the Gift and Hospitality Procedure & FAQs. Even if you decide not to accept an offer, you still need to follow the rest of this procedure to assess whether you're required to enter the offer into the Register.

ASK

DOES THE OFFER INVOLVE A PUBLIC OFFICIAL?

YES

- The offer must be recorded in the [register](#) **within 14 days**.
- You must obtain **approval** from your relevant **General Manager** before accepting, or making, an offer involving a public official.

NO

DOES THE OFFER INCLUDE FREE AIR TRAVEL?

YES

- The offer must be recorded in the [register](#) **within 14 days**.
- You must obtain **approval** from your relevant **General Manager** prior to accepting, or making, an offer involving free air travel.

NO

IS THE OFFER WORTH (OR ESTIMATED TO BE WORTH) \$200 OR MORE?

YES

- The offer must be recorded in the [register](#) **within 14 days**.
- You must obtain approval from your **line manager** before accepting, or making, an offer worth \$200 or more.

NO

- You do not need to enter the offer in the register.
- You must still check that the offer is acceptable under the [gift and hospitality procedure and FAQs](#) before making or accepting the offer.

Important note:

The relevant offers (as outlined above) must be recorded in the gift and hospitality register even if they aren't accepted. The gift and hospitality register may be subject to internal and external review.