

## Anti-Bribery and Corruption (ABC) Policy

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## 1. Purpose

CareFlight is committed to a high level of integrity and ethical standards in all of its business and charitable purposes. As part of this commitment, CareFlight has zero tolerance for Bribery and Corruption.

The purpose of this Anti-Bribery and Corruption Policy (ABC Policy) is to set clear standards for how all Employees should behave, to prevent Bribery and Corruption in CareFlight practices. The conduct required under this ABC Policy aligns with the CareFlight Code of Conduct and Ethics (ref: [HR-009](#)) which explains CareFlights' values and the expectations it has of its Employees, particularly the core values of Integrity and Respect.

The ABC Policy is a key element of CareFlights' Corporate Governance program. A copy of this ABC Policy will be available on the CareFlight website and its intranet (Wiki).

## 2. Scope

This policy applies to all CareFlight directors, employees (past and present), volunteers, agents and contractors (including temporary contractors) of CareFlight wherever located, collectively referred to in this policy as 'Employees'. In certain circumstances the obligations set out in this ABC Policy may extend to an Employee's Connected Persons.

Employees must exercise personal judgement to determine whether the acceptance or offering of a Gift to, or by a Connected Persons, could constitute a Bribe. This policy is not limited to the workplace or work hours. This policy extends to all functions and work-related activities, which include work lunches, community engagements, fundraising events, conferences and other function or dealings that may be associated with CareFlight's business, charity or reputation.

## 3. Definitions and Acronyms

Term	Acronym	Definition
Bribe	-	an inducement or reward offered, promised or provided with the intention of influencing a person to do or omit to do anything in the performance of their role or function, in order to obtain business or an advantage that is not legitimately due Bribes may be durable or consumable, and may include one or more of the following, but not limited to examples: <ul style="list-style-type: none"> <li>• Gifts;</li> <li>• Discounts;</li> <li>• Benefits and 'perks' to relatives including employment, education and training;</li> <li>• Unwarranted allowances or expenses;</li> <li>• Kickbacks or Secret Commissions;</li> <li>• Facilitation payments;</li> <li>• Donation to a CareFlight Fundraiser, Political or charitable donations;</li> <li>• Community outreach and stakeholder engagement expenses;</li> </ul>
Bribery	-	is the act of offering, promising, giving, accepting or of a Bribe.
Chairperson	Chair	means the chairperson of the Careflight Board of Directors

Term	Acronym	Definition
Chief Executive Officer	CEO	means the Chief Executive Officer of CareFlight Ltd. In the event that a disclosure is in relation to the actions of the CEO, this policy should be read as if references to the CEO are to the Chairperson of the CareFlight Ltd Board of directors.
Connected person	-	means a spouse, partner, child, step-child, parent, grandparent, grandchild, sibling or step-sibling of the Employee or of the Employee's spouse or partner.
Corrupt business	-	means dishonest activity in which an Employee acts contrary to the interests of CareFlight and abuses his/her position of trust in order to achieve some personal gain or advantage for their-self or for another person or entity or CareFlight.
Employee	-	means any current or former employee of CareFlight and includes directors, employees, volunteers, agents and contractors (including temporary contractors) of CareFlight wherever located.
Facilitation payment	-	means a minor payment or other inducement provided to a Public Official in order to secure or expedite a routine government action which the Public Official is already ordinarily obliged to perform.
Gift	-	means the free provision of a good or service in association with CareFlights' business, or charitable purpose, that holds objective material value or confers some benefit either to the recipient or their Connected Persons, of CareFlight. Gifts may be durable or consumable and may include things such as a meal, discounts, tickets or invitations to a sporting, entertainment or cultural event, a gift voucher, a donation to a CareFlight fundraiser, political or charitable donation, or other tokens of appreciation.
Kick-Back / Secret Commission	-	means an undisclosed payment (or something of value) that is offered or provided to an agent or representative of a person or company in order to influence the conduct of the business of the principal.

## 4. Legal and other requirements

Australia has its own anti-bribery and corruption requirements. Specific requirements include:

- State and Territory legislation applying to bribery of public officials and private individuals;
- Criminal Code (Commonwealth) offences for bribery of Commonwealth officials;
- Criminal Code offences for bribery of foreign officials (with some application to overseas conduct); and
- false accounting offences where a business falsely records bribes as legitimate expenses.

Australian laws also catch facilitation payments, also known as "grease" payments. These are payments to public officials to speed up or smooth out an approval which would have happened anyway and are distinguished from payments to change an outcome. Facilitation payments are only permitted if they meet certain criteria, including prompt, accurate records.

Some laws, such as the Australian *Criminal Code Act 1995* (Cth), the United States' *Foreign Corrupt Practices Act* and the United Kingdom's *Bribery Act 2010*, have extra-territorial reach. This means that, for example, a citizen of Australia or another country may be prosecuted in Australia, the United States or the United Kingdom, even where the relevant activity occurred entirely overseas

## 5. Responsibilities

<b>CEO</b>	has responsibility for determining corrective action in relation to breaches of the policy and for conducting investigations into reports that the policy has been or may have been breached by an Employee. The CEO may delegate the conduct of the investigation to another Employee but will remain responsible for the proper conduct of the investigation.
<b>Executive Members</b>	have responsibility for ensuring: <ul style="list-style-type: none"><li>a) this policy is communicated to all Employees within their area;</li><li>b) this policy is complied with by all Employees within their area; and</li><li>c) the protection and welfare of any Employee who notifies a breach or suspected breach under this policy.</li></ul>
<b>All Employees</b>	have responsibility for: <ul style="list-style-type: none"><li>a) adhering to this policy; and</li><li>b) notifying Executive Members of any breaches or suspected breaches of the policy.</li></ul>

## 6. Prohibition of bribery and corruption

### 6.1 Prohibition of bribery

Employees must not give, offer, promise, accept or request a bribe and must not cause a bribe to be given, offered, promised or accepted by another person.

Under no circumstances will CareFlight approve of any offers, or make, request or receive an irregular payment or other thing of value, to win business or influence a business decision in the CareFlight's favour.

Such actions are in breach of this ABC Policy and illegal in the jurisdictions in which CareFlight operates.

As bribery can take many forms, it is important that Employees understand where risks may arise and what is expected of them.

### 6.2 Prohibition of corrupt conduct

CareFlight prohibits all its Employees from engaging in corrupt conduct.

Corrupt conduct is the dishonest or fraudulent misuse of a position of power, influence or the terms of a person's employment, in order to gain, directly or indirectly, a benefit by:

- acting or not acting in a certain manner; or
- the misuse of information or knowledge held by the person for a reward,

including creating or using falsified documentation or concealing or destroying documentation. Bribery and the other forms of misconduct described in this section 6 can be examples of corrupt conduct.

## 6.3 Prohibition of facilitations payments

CareFlight prohibits all CareFlight Employees from making facilitation payments.

Facilitation payments are unofficial payments made either directly or indirectly to Public Officials to speed up or secure the performance of a government decision or action that is routine or would have been made or occurred in the ordinary course.

Public Officials are persons (typically individuals) who perform functions for a government, government body or state-owned or state-controlled enterprise, such as politicians and other legislative officers, judges, magistrates and other judicial officers and any person acting as an officer of a department, agency or enterprise who acts in accordance with the directions of a government.

An example of a facilitation payment is paying an officer of a government agency to speed up the processing of an application for a licence application, work permit, inspection, connection of utility services or the release of bonded goods.

Facilitation payments are prohibited under this ABC Policy, regardless of whether they are legal or customary in any country.

## 6.4 Prohibition of secret commissions or kickbacks

CareFlight prohibits all CareFlight Employees from paying or receiving secret commissions or kickbacks.

A secret commission or kickback is payment or other benefit given to an employee or agent acting on behalf of a principal which the Employee or agent does not disclose to the principal

An example is a CareFlight Employee making a payment to an employee or agent of a supplier or customer, where that employee or agent does not disclose the payment to the supplier or customer, in return for obtaining a commercial advantage for CareFlight.

## 6.5 Exception: payments to protect the safety of Employees and/or Patients

If CareFlight Employees, and/or Patients face a demand that involves imminent explicit or implicit threats to personal safety, they may make a payment which would otherwise be prohibited under this policy.

CareFlight Employees must notify CareFlight in accordance with [Section 11 - Notifications](#) as soon as reasonably practicable after the event and provide documents and information related to the payment.

## 7. Gifts, entertainments and hospitality

### 7.1 Prohibition of improper gifts, entertainment or hospitality

CareFlight prohibits all CareFlight Employees, in connection with a CareFlight business, operation or charitable matter, from giving or receiving a gift, entertainment or hospitality (including sponsored travel or similar benefits) where doing so might amount, or create the impression of a benefit amounting, to bribery or corruption.

The practice of providing gifts and hospitality varies between countries, regions and industries. What may be acceptable and appropriate in one place or industry may not be in another. However, CareFlight Employees must comply with this ABC Policy wherever they are doing CareFlight business or charitable purposes.

Even where approved in accordance with this ABC Policy, CareFlight Representatives and CareFlight Contractors must exercise caution when offering or accepting a gift, entertainment or hospitality to ensure it does not, and is not perceived to, improperly influence a business outcome. If there is any risk, you should not do so and discuss the matter with your relevant Executive Member.

### 7.2 Acceptable gifts and entertainment

CareFlight acknowledges that receiving or giving a gift, entertainment and hospitality of relatively low value is unlikely to be perceived as bribery or corruption.

Acceptable gifts, entertainment, hospitality or other benefits should meet the following requirements:

- **Made for the right reason** – it should be clearly understood by both the giver and the recipient as a token of goodwill or common courtesy associated with standard business practice.
- **No obligation** – it does not place the recipient under any obligation.
- **No expectation** – expectations are not created by the giver or the recipient
- **Relatively low value** – in relation to:
  - gifts, its value is such that it would be understood as a token of goodwill or common courtesy; and
  - entertainment, hospitality or a service, it is not extravagant or very expensive, and in both cases would not be considered to give rise to any obligation or expectation.
- **Legal** – it complies with all relevant laws

### 7.3 Approval of gifts, entertainment and hospitality

In this Section, the word “benefit” includes any gift, entertainment, hospitality or **related** benefit.

CareFlight Employees must not offer or receive unacceptable benefits as described in Section 7.2 above.

*Offering benefits*

- *If valued above A\$500 – obtain approval*

CareFlight Employees must seek approval in writing if they intend to offer or provide a benefit if the benefit is valued above A\$250 or foreign currency equivalent (or such other thresholds as the Chief Financial Officer may specify for particular countries from time to time).

CareFlight Employees seeking approval must consult with their relevant Executive Member to determine from whom the approval must be sought, as approvals may only be given by named personnel, in accordance with their respective divisional limits, as set out in CareFlights Delegation of Authority Schedule (ref: [FN-004](#)).

## *Receiving benefits*

- CareFlight Employees must seek approval in writing from their manager if they intend to receive or accept:
  - a gift or other tangible item of value if the benefit is valued or estimated to be above A\$500 or foreign currency equivalent (or such other thresholds as the Chief Financial Officer may specify for particular countries from time to time).
  - entertainment, hospitality or related service:
    - where there may be a reasonably held perception the intended benefit may not meet the acceptability requirements set out in section 7.2; or
    - which in all cases is valued or estimated to be above A\$500 or foreign currency equivalent (or such other thresholds as the Chief Executive Officer may specify for particular countries from time to time).
- Circumstances tending to indicate acceptable entertainment, hospitality or related services would be:
  - attending an annual golf day, sporting or other event along with a range of people as part of an ongoing business or charitable purpose, relationship at a time where there is no particular transaction or determination to be made involving the provider of the benefit.
- Circumstances tending to indicate unacceptable entertainment, hospitality or services would be:
  - lavish, expensive entertainment or an unusual service, or which is offered frequently, provided solely to CareFlight Employees and exacerbated where CareFlight will make, or is in the process of making, a decision involving the provider of the benefit, such as their engagement as a contractor or service provider or entering into an acquisition, joint venture or similar transaction with the provider.
- *Approvals*

Requests for approval must be submitted promptly and written approval obtained prior to offering or receiving the benefit in the circumstances specified above.

If the offering, receipt or retention of the benefit is not approved (in whole or in part), CareFlight Employees must follow any directions from CareFlight in relation to the benefit. Where a benefit has already been received, these directions may include directions to return, account for or otherwise relinquish, the benefit to the extent practicable.

- *Sponsored travel*

Approval may be given to CareFlight Employees accepting or offering sponsored travel, invitations to events involving activities over consecutive days, or overnight accommodation, but only if there are compelling business reasons.

- *Benefits to Public Officials – additional requirements*

Benefits intended to be offered or provided to Public Officials must be pre-approved by the Chief Operating Officer in consultation with CareFlight's legal team regardless of the value of the benefit, in addition to any Executive Member approval required under the CareFlights Delegation of Authority Schedule (ref: [FN-004](#)).

## 7.4 Records

The person seeking approval or making a notification, and the Executive Member, granting approval, must maintain written records and produce them upon request made by an Executive Member or a member of the CareFlight Board of Directors or Audit and Risk Committee. This must include a record of the parties involved, the nature and value of the benefit, the date of the offer (and if applicable, the giving of the benefit), the payment arrangements and the purpose of all transactions.

A record of **all gifts and hospitality offered** >\$(AUS) 500, whether accepted or not, will be added to the Gifts & Hospitality Register ([Annexure 2](#)) maintained by the Executive Assistant to the CEO.

## 8. Donations and sponsorships

Donations and sponsorships must not be given or received as a means of making improper payments.

CareFlight may support various causes and charities. Charitable support and donations are acceptable, whether of in-kind services or direct financial contributions, subject to notification and approval in accordance with CareFlights Delegation of Authority Schedule (ref: [FN-004](#)).

However, CareFlight Employees must be careful to ensure that charitable donations are not used as a scheme to conceal direct or indirect bribery or corruption.

**All political donations and sponsorships are prohibited** except where prior approval in writing has been given by the CEO. CareFlights Legal Team must be consulted and advised of all approvals of political donations and sponsorships.

## 9. Accounting and Record Keeping

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties (including due diligence reports), such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts may be kept "off-book" to facilitate or conceal improper payments.



All expenditure by Employees and Representatives, including on gifts, entertainment and hospitality, shall be included in expense reports and approved in accordance with CareFlights applicable policies and procedures.

A record of **all gifts and hospitality offered** >\$ (AUS) 500, whether accepted or not, will be added to the Gifts & Hospitality Register ([Annexure 2](#)) maintained by the Executive Assistant to the CEO.

## 10. CareFlight Contractors

### 10.1 Definition of CareFlight Contractor

In this ABC Policy the term CareFlight Contractors includes sub-contractors, agents, distributors, business representatives, consultants and advisers, while acting on behalf of, or providing services to, CareFlight or who are subject to the direction or control of CareFlight.

### 10.2 Potential exposure of CareFlight

In certain circumstances, CareFlight may be liable under laws prohibiting bribery and corruption for the conduct of CareFlight Contractors.

Accordingly, the Executive Member, responsible for the relationship with a CareFlight Contractor (referred to below as the **Responsible Manager**) must attend to the matters set out in this Section 10.

### 10.3 Communication of this ABC Policy to CareFlight Contractors

The Responsible Manager must:

- ensure that all CareFlight Contractors for whom they are responsible are provided with a copy of the policy; and
- make clear that CareFlight Contractors are required to comply with this policy, including the requirements for notification to the Responsible Manager, and approval in accordance with the CareFlights Delegation of Authority Schedule (ref: [FN-004](#)), of any gift, hospitality or entertainment intended to be given or received by the CareFlight Contractor, if such benefit could be perceived as potentially influencing or otherwise connected with a CareFlight business, or charitable, matter.

CareFlight's legal team can assist in providing appropriate wording for written communications by Responsible Managers with CareFlight Contractors.

### 10.4 Contracts with CareFlight Contractors.

Before entering into any new, renewed or varied contract with a CareFlight Contractor (ref: [EX-010](#)), CareFlight will consider the extent to which it is feasible to include a contractual provision to the effect that the Contractor will comply with this ABC Policy and otherwise comply with all applicable laws relating to bribery and corruption. CareFlight's legal team can assist in this assessment and provide appropriate wording.

## 10.5 Internal Controls and due diligence

If CareFlight proposes to engage a CareFlight Contractor (ref: [EX-010](#)), the Responsible Manager must take reasonable steps to assess any potential bribery and corruption risk and to minimise the risk that the actions of the CareFlight Contractor will adversely affect CareFlight.

This includes conducting sufficient due diligence which may involve, where appropriate, background checks, checking the reasonableness of proposed service fee amounts and terms and that payment requirements appear legitimate.

CareFlight Employees should also be alert to indications in the course of a CareFlight Contractor's engagement that might suggest the existence of, or potential for, bribery and corruption. [Section 17 - Annexure 1](#) sets out examples of potential "red flags" that might indicate such a risk.

Where any issues of concern are identified, the Responsible Manager or any other CareFlight Employees should report their concerns to the:

- applicable Executive Member linked to the area within CareFlight; and
- CEO - in respect of major Assets, Infrastructure & Property.

These Executive Members will then determine, in consultation with the CEO, other senior management and Legal if required, whether a more detailed investigation is required before engaging, or continuing with the engagement of, the CareFlight Contractor.

## 11. Third parties: customers, patients, suppliers, joint venture partners, acquisitions and others

### 11.1 Definition of Third Party

CareFlight engages with a broad range of Third Parties in a variety of circumstances in its activities and across its supply chain, including the supply and procurement of goods and services. CareFlight may also be involved in a number of joint ventures with Third Parties.

Third Party in this ABC Policy means any individual or entity with whom CareFlight Employees are dealing in the course of a CareFlight business, or charitable purpose, other than CareFlight Contractors (who as CareFlight Personnel are specifically required to comply with this policy). This includes actual and potential customers, patients, clients, suppliers, distributors and joint venture counterparties, and their respective advisers and representatives.

### 11.2 Contracts with third parties

Contracts with Third Parties should be in writing. A written contract can include an exchange of correspondence.

CareFlight Employees should, wherever possible, include in any written contract a statement that CareFlight:

- is committed to complying with all laws of each jurisdiction in which it conducts business, including all laws relating to bribery and corruption; and

- expects all parties with whom it conducts business to have the same commitment

## 11.3 Joint venture parties

Joint ventures that are effectively controlled by CareFlight through ownership, management or other involvement must comply with this policy as CareFlight Employees.

Where CareFlight does not exercise effective control of the joint venture, CareFlight Employees who manage the joint venture relationship on behalf of the relevant Executive Member counterparty must take reasonable steps as are open to them to ensure that both the joint venture, and the joint venture counterparty, comply with this policy or have in place equivalent policies and procedures.

The opportunity to take such steps will usually arise on the formation of the joint venture or on any renewal or amendment to the joint venture agreement.

CareFlight's legal team can assist in providing appropriate wording for the joint venture contract or any renewal or amendment of it.

## 11.4 Internal controls and due diligence

CareFlight Employees should be alert to indications of potential bribery and corruption risks during the engagement of and ongoing relationship with Third Parties. CareFlight Employees should take all reasonable steps to minimise the risk that the actions of a Third Party will adversely affect CareFlight.

In this regard, CareFlight Employees should be alert to the same potential "red flags" that might arise in dealings with a CareFlight Contractor (see the [Section 17 - Annexure 1](#)).

Where CareFlight Employees identify any issues of concern with a Third Party, they should report their concerns to the:

- applicable Executive member linked to the area within CareFlight; and
- CEO - in respect of major Assets, Infrastructure & Property.

These Executive members will then determine whether more detailed investigation or other action is required.

## 11.5 Acquisitions

The project team for any potential acquisitions of companies or businesses should consider potential bribery and corruption risk. Pre-acquisition due diligence should extend to querying anything that appears improper, as well as the quality of controls and procedures. The CareFlight Personnel carrying out due diligence must retain records of their due diligence and report any issues identified.

If issues are identified, the Executive must be informed, and they must consider the appropriate response. This may include not proceeding with the proposed transaction

## 12. Notifications, inquiries and reporting

### 12.1 Notifications and inquiries

CareFlight Employees must notify the relevant Executive Member of the first instance of, or circumstances giving rise to reasonable grounds to suspect, bribery and corruption. If a CareFlight Employees are unsure whether a particular matter constitutes bribery or corruption, or have any other queries or concerns, these should be raised with the relevant Executive member

If a CareFlight Employee has concerns in relation to the above reporting/notification process the notification can be made in accordance with CareFlights Whistleblower Policy (ref: [HR-057](#)) CareFlight Personnel who make a proper notification in accordance with CareFlights Whistleblower Policy (ref: [HR-057](#)) will receive the protections available to them under that policy, and their notification and related inquiries will be handled accordingly. A manager receiving a notification alleging bribery or corruption must ensure that it is forwarded in accordance with the above procedure to the relevant Executive Member.

A deliberately false or reckless notification could cause CareFlight and CareFlight Employees the subject of such a notification serious commercial and reputational loss and damage. Such notifications can also waste considerable time, effort and resources. CareFlight reserves the right to take appropriate action against any CareFlight Personnel found to have made such a notification including treating it as a serious disciplinary matter

### 12.2 Board Reporting

If inquiries in relation to a notification warrant an investigation, the investigation and its outcome will be reported to the Audit and Risk Committee (ARC). The ARC will in turn report the matter to the Board. In serious or urgent cases, the matter may be immediately notified to the Chair of the ARC and the Chair of the CareFlight Board who may determine that the rest of the Board should be advised.

## 13. Contraventions

Disciplinary action may be taken in respect of breach by CareFlight Employee of this ABC Policy up to and including dismissal.

CareFlight may terminate its business relationship with any CareFlight Contractor who does not follow this ABC Policy.

Contraventions of bribery and corruption laws may also have serious legal consequences and attract significant criminal or civil penalties for CareFlight, and CareFlight Employees, involved in the contravention and may expose CareFlight and CareFlight Employees to other financial or reputational damage.

## 14. Training

HR On-Boarding E-learning training on ABC Policy forms part of the induction process for all relevant CareFlight Employees, depending on the nature and risk profile of their associated business / charitable operation.

The Company's prohibition on bribery should be communicated to all suppliers, contractors and business partners at the outset of CareFlight business / community relationship with them, and as appropriate during the course of their work with CareFlight. Where the volume of suppliers, contractors and business partners for CareFlight makes communication to all of them prohibitive or onerous, CareFlight may communicate this ABC Policy to those operating in the most high-risk jurisdictions and otherwise in accordance with any guidelines issued by CareFlight's Legal Team from time to time.

## 15. Review of this ABC Policy

This policy should be reviewed biennially, or more frequently as required by changes in legislation and other developments, to ensure compliance with the laws, regulations and governance best practices or by an Executive Member if they consider it necessary to check if reports or breaches were appropriately recorded, investigated and responded to, so ensuring the ABC Policy and related procedures remain effective and relevant to the current needs of CareFlight.

The Board and/or Audit & Risk Committee may change this ABC Policy from time to time by resolution.















This Policy will be made available on the Company's website and Company intranet (Wiki).

## 16. Document Change History

Version	Date	Summary of Changes	Changes compiled by	Changes approved by
01	28/07/2022	Initial publication of document	Sarah Churchill GM People & Clinical	CareFlight Board Meeting: 28 July 2022

## 17. Annexure 1 – Potential Red Flags

The following is a list of bribery and corruption “red flags” that may arise during the course of working for or providing services to CareFlight. The list is for illustration only and is not intended to be exhaustive. If you encounter any of the following, you must report them promptly in accordance with [Section 12](#) of this ABC Policy.

-  • You learn that a third party engages in, or has been accused of engaging in, improper business practices
-  • You learn that a third party has a reputation for paying bribes
-  • A third party insists on receiving a commission or fee payment before committing to sign up to a contract with CareFlight, or carrying out a government function or process for CareFlight
-  • A third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made
-  • A third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business
-  • A third party requests an unexpected additional fee or commission to “facilitate” a service
-  • A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services
-  • You learn that a colleague has been taking out a particular supplier for very expensive and frequent meals
-  • A third party requests that a payment is made to “overlook” potential legal violations
-  • A third party requests that CareFlight provide employment or some other advantage to a friend or relative
-  • You receive an invoice from a third party that appears to be non-standard or customised
-  • A third party insists on the use of side letters or refuses to put terms agreed in writing
-  • You notice that the Company has been invoiced for a commission or fee payment that appears large given the service stated to have been provided
-  • You are offered an unusually generous gift or offered lavish hospitality by a third party

## 18. Annexure 2 – Gifts and Hospitality Register

Central register of all gifts and hospitality offered >\$500 maintained by the Executive Assistant to the CEO

[illegible]