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Gifts, Benefits & Hospitality Policy

Approved by the Board on 23 October 2025 (Resolution 787)

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Purpose

When we perform our public duties, it's vital that our decision-making is impartial. This policy is intended to support workplace participants and ACMI to avoid conflicts of interest and maintain high levels of integrity and public trust.

Sometimes, when offering or receiving gifts, benefits and hospitality, employees encounter difficult situations where they're not sure if they're doing the right thing.

This policy states ACMI's position on:

- responding to offers of gifts, benefits and hospitality; and
- providing gifts, benefits and hospitality.

Context

This policy is intended to support workplace participants and ACMI to avoid conflicts of interest and maintain high levels of integrity and public trust.

ACMI has issued this policy to support behaviour consistent with the Code of Conduct for Victorian Public Sector Employees (the "Code"), the Code of Conduct for Directors of Victorian Public Entities and the Victorian Public Sector Commission's Minimum Accountabilities (see Appendix A). Workplace participants are required to adhere to [Victorian public sector values](#) of impartiality, integrity and accountability.

Minimum accountabilities

The Victorian Public Sector Commission (VPSC) issues Minimum Accountabilities for the management of gifts, benefits and hospitality. These are binding on our organisation. This policy is based on the Minimum Accountabilities.

Application

This policy applies to all workplace participants. This includes:

- ACMI employees and executive officers;
- Board and Board committee members;
- volunteers, work experience students and interns; and
- individuals, contractors¹, consultants and any volunteers, interns, cadets and work experience students or other individuals or groups undertaking activity for or on behalf of ACMI.

¹ Note the application of clause 1.4 of the Code to the engagement of contractors and consultants. Contractors and consultants are only bound by the code if explicitly required by their contract for services.

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If you are a:	
Employee, you must:	Employee with direct reports, you must:
<ul style="list-style-type: none"> comply with this policy when receiving or providing Gifts, Benefits or Hospitality not solicit Gifts, Benefits or Hospitality for yourself or others obtain your manager's approval before accepting any non-token offer record all non-token offers on the internal register, even if you decline them. 	<ul style="list-style-type: none"> identify and understand the risks inherent to your direct reports' roles oversee your direct reports' compliance with this policy assess and approve offers (both received and made) in line with this policy model good practice, promote awareness of this policy and give sound advice.

Head of organisation

As a public body head, the Director & CEO must fulfill their obligations under the minimum accountabilities.

'Thanks is enough'

Workplace participants should strive to create a culture of 'thanks is enough' by refusing offers even if they are permitted under this policy, and helping external stakeholders to understand this policy and the 'thanks is enough' policy principle – for example, by discouraging gift offers, especially repeat offers.

Key Definitions

Benefits	<p>Include preferential treatment, favours or other advantage.</p> <p>For example: invitations to sporting, cultural or social events, access to discounts and loyalty programs, and promises of a new job.</p>
Business associate	<p>An external individual or entity which the organisation has, or plans to establish, some form of business relationship, or who may seek commercial or other advantage by offering gifts, benefits or hospitality.</p>
Conflicts of interest	
<i>Actual conflict of interest:</i>	There is a <u>real conflict</u> between an employee's public duties and private interests.
<i>Potential conflict of interest:</i>	An employee has private interests that <u>could conflict</u> with their public duties. This refers to circumstances where it is foreseeable that a conflict may arise in future and steps should be taken now to mitigate that future risk.
<i>Perceived conflict of interest:</i>	The public or a third party could <u>form the view</u> that an employee's private interests could improperly influence their decisions or actions, now or in the future.
Gifts	<p>Free or discounted items or services that would generally be seen by the public as a gift.</p> <p>For example: jewellery, flowers, chocolates, or money (other than money fundraised consistent with relevant legislation and government policy).</p>
Hospitality	<p>The friendly reception and entertainment of guests.</p> <p>For example: refreshments at a business meeting, expensive restaurant meals, sponsored travel, and accommodation.</p>

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Legitimate business benefit	Gifts, benefits and hospitality accepted or provided for a business purpose, in that it furthers the conduct of official business or other legitimate goals of the organisation, public sector or State.
Token Offer	Refers to anything with an actual or estimated value less than \$50.
Non-Token Offer	Refers to anything with an actual or estimated value more than \$50.
Official gifts and items	<p>Official gifts and items include:</p> <ul style="list-style-type: none"> • official gifts • official items (items with cultural, ceremonial, religious, historic, or other significance) <p>Sometimes accepted or given on behalf of our organisation as part of business with official delegates or representatives of a community group, organisation, or government.</p> <p>Example</p> <p>Our organisation has been working with a local community group representing people of a specific cultural background. In gratitude for our work, the group presents the staff member leading the group with a gift that is culturally significant to them. This is an official item.</p> <p>The community group, in addition to this official item, provides the staff member with a bottle of wine for the team to celebrate the successful work. This is an official gift – it is not culturally significant, but it was provided by an organisation in recognition of our relationship with them.</p> <p>The staff member accepts both gifts on behalf of our organisation, declares both, and our organisation determines what to do with the gift as soon as reasonably possible.</p> <p>Official gifts and items are declared and recorded regardless of their value and regardless of whether they were accepted or refused.</p>
Internal Register	The official record of all declarable offers of gifts, benefits and hospitality made to our employees or organisation, whether accepted or declined. Available on Confluence here: < http://spforms/sites/intranet/Lists/Gifts%20Register/AllItems.aspx >
Public register	The official record of information made public from our organisation's internal register. It is published online.

Offers not considered gifts, benefits or hospitality under this policy

Offers made to you in a personal capacity

You may receive offers that are unconnected to your work. If you wish to accept such an offer, you must:

- ensure it was made to you as a private citizen
- consider whether it gives rise to a conflict of interest
- ensure it could not be seen to influence your official actions or decisions.

If you need advice about accepting such offers, talk to your manager.

Certain fundraising activities

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Fundraising as a private citizen does not breach the minimum accountabilities. This includes:

- raising awareness of, or contributing to, an online fundraiser
- selling chocolates for your child's school
- participating in third-party fundraisers e.g. a sausage sizzle for your local football club.

You cannot use ACMI resources to carry out or contribute to any private fundraising activity.

Invitations to Official Business Events

Official Business Events (OBEs) are core activities of ACMI. Attending an OBE is permitted when it is directly related to the core functions of your employment and attendance is consistent with ACMI's organisational goals and supports our strategic directions. OBEs do not constitute Gifts, Benefits or Hospitality as attending them is part of doing your job.

Attendance may be required for any of the below listed reasons:

- Relationship management: business leveraging, including pursuing grant, fundraising and sponsorship activities
- Sector knowledge
- State functions and events
- Professional Development

Excluded from OBE are activities for which ACMI has paid attendance fees, including through membership fees, and those which appear to be limited to Hospitality or personal Benefit such as: private breakfasts, dinners, lunches, Christmas functions, golf days etc. Workers should decline Benefits or Hospitality where there is no public Benefit in attending private functions in an official capacity.

You must seek approval to attend OBE from your manager and register attendance in ACMI's Events Attendance Register. There is no requirement to register events where people receive an invitation but elect not to attend.

Management of offers of gifts, benefits and hospitality**Responding to offers of gifts, benefits and hospitality: Process overview**

Your default response to offers should be to politely decline.

The following table summarises how we manage and report offers. This process is also demonstrated in the flowchart in **Appendix B**.

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Step	Token offer	Non-token offer
1. Estimate the offer's value.	Yes.	Yes.
2. Politely decline the offer, unless an exception exists.	Yes.	Yes.
3. In an instance where you wish to consider acceptance, apply the Integrity Test to determine if you can accept the offer.	Yes – you must conduct Part A of the Integrity Test. If the offer relates to an event, you must also conduct Part C.	Yes – you must conduct Part A and Part B of the Integrity Test. If the offer relates to an event, you must also conduct Part C.
4. If Step 3 applies and the offer passes the Integrity Test, obtain your manager's approval before accepting it.	No.	Yes – you must obtain approval from your manager before accepting it (or, in the case of certain gifts or on-the-spot hospitality, within 5 business days).
5. Record the offer on the internal register.	No.	Yes – you must declare the offer as soon as practicable.
6. If you accepted a gift, manage its ownership.	You may retain the gift, provided it is modest.	No – you cannot retain the gift. You always accept non-token gifts on behalf of ACMI.

The following sections discuss each of the above steps in further detail.

Step 1: Estimating an offer's value

You must accurately estimate an offer's value. If you cannot easily establish an offer's actual value, you should err on the side of overestimation.

In addition, please note that the following minimum values apply:

- all official gifts and items (i.e. items with cultural, ceremonial, religious, historical, social or other significance that honour an important business relationship or milestone) – \$50 or higher
- all meal offers – \$50 or higher
- all meal or event offers where guests could drink alcohol (even if you will not consume any) – \$100 or higher.

Step 2: Politely declining an offer

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Our default position is to politely decline offers.

However, there are instances where immediate declination is not possible, such as:

- wrapped gifts, which are difficult for us to value and politely decline in the moment
- mailed gifts, which are impossible for us to politely decline in the moment.

In these instances, you should withdraw your acceptance after the fact.

If it is ...	you should ...
possible to withdraw acceptance	politely return the gift or reject the invitation as soon as possible.
impossible to withdraw acceptance	seek advice on available options e.g. donate the gift to ACMI's social club or a local charity; report the offer to your manager to ensure its effective management.

As an organisation, we will work with external stakeholders to understand this policy and its intent by discouraging offers, especially repeat offers.

When declining an offer, you should, wherever possible, look to politely remind the offeror of ACMI's default position.

Please contact your manager if you need help:

- declining an offer (either before or after the fact)
- communicating with external stakeholders about this policy.

Step 3: Applying the Integrity Test to an offer

If you wish to consider accepting an offer, you must apply the Integrity Test.

Offers you may consider for acceptance include:

- official gifts or items provided as part of cultural or community practices (e.g. a commemorative plaque)
- [sponsored travel or accommodation](#), if you are presenting at a conference on AMCI's behalf.

Integrity Test: Part A

Mandatory questions for all token and non-token offers

If you answer YES to any of these questions, you must decline the offer

- 1 Have you been offered money (e.g. stipends), something that functions like money (e.g. gift cards), or something that is easily exchanged into money?

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2	Could accepting the offer give rise to an actual, potential or perceived conflict of interest?
3	Is there a risk that accepting the offer could undermine the public's trust in ACMI, the Victorian Government, or your ability to do your job impartially? <i>Note: Generally, the higher the offer's value, the greater the risk of reputational damage.</i>
4	Would accepting the offer be at odds with the community's expectations?
5	Is there a risk that the public could perceive the offer as a bribe or inducement? <i>Note: You must report such offers to your manager or the Independent Broad-based Anti-corruption Commission (IBAC).</i>
6	Are you likely to make or influence a decision (e.g. relating to procurement, grants, sponsorships, other funding agreements or recruitment) about the offeror in the foreseeable future? Have you made or influenced such decisions in the recent past? <i>Note: You must always decline offers from anyone involved in an active procurement process, as well as current suppliers.</i>
7	Is it likely that the offeror is trying to negotiate or advance their position with ACMI?
8	Could the public perceive your acceptance as a form of endorsement?
9	Is it likely that someone made the offer on behalf of a third party in an attempt to influence you?
10	Would accepting the offer make you feel uncomfortable? Would you feel awkward having to justify your acceptance to the Secretary, an auditor, or the public?

If the offer passes **Part A**, proceed to:

- **Part B** for all non-token offers; then
- **Part C** for all offers to events.

Integrity Test: Part B

Mandatory assessment for all non-token offers

If you do not have a legitimate business reason, you must decline the offer (even if it passes Part A)

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To be considered for acceptance, a non-token offer **must**:

- further the objectives of ACMI, the public sector or the Victorian Government
- further the conduct of official business or goals of our organisation, consistent with community expectations
- directly relate to your role and responsibilities.

The below may, in some circumstances, constitute legitimate business reasons for the purposes of this policy.

Reason	Description
Leveraging business connections	<p>You accept an offer to:</p> <ul style="list-style-type: none"> • create or explore opportunities for ACMI with respect to trade, investment and collaboration; and/or • further existing relationships with important stakeholders that play a pivotal role in achieving ACMI's strategic objectives. <p>You must be able to explicitly link the offer to your team's workplan and priorities.</p>
Acquiring essential knowledge	<p>You accept an offer to learn more about a key sector, event or technical field that is directly relevant to your role. You must be able to explicitly link the offer to your workplan and priorities.</p>

'Networking' and 'maintaining stakeholder relationships' are not legitimate business reasons to accept an offer.

If the offer passes **Part A** and **Part B**, proceed to **Part C** for all offers to events (if applicable).

Integrity Test: Part C

Additional mandatory questions for all offers to events

*In performing our public duties, our decision-making must be impartial. To maintain the public's trust in our organisation and prevent corruption, if you answer YES to any of these questions, you **must** decline the offer (even it passes Parts A and B).*

- | | |
|---|---|
| 1 | <p>If you decline the offer, will ACMI be sufficiently represented at the event?</p> <p><i>Note: Representation is directly linked to Executive Officers' role and responsibilities</i></p> |
| 2 | <p>Is the event an end-of-year celebration or party, or a comparable / similar event?</p> |

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3	Can this engagement with the offeror (or other attendees) occur in a standard business setting? <i>Note: Location and nature of the engagement must be consistent with community expectations.</i>
4	Can ACMI purchase its own tickets instead?

Further information to consider before accepting an offer

Even if an offer passes the Integrity Test, you should think twice before accepting it. Remember – ‘thanks, but no thanks’ is appropriate in most circumstances.

Guests

If your invitation allows you to bring a guest (and it is appropriate to do so, which it rarely is), they must be a fellow employee. This employee must:

- perform work directly relevant to the event
- comply with this policy (including applying the Integrity Test, obtaining approval and recording the offer).

We strongly suggest that the Integrity Director is consulted if you are considering taking a guest to an event that constitutes Gifts, Benefits or Hospitality.

There are exceptions to this rule for senior executives, i.e. the Secretary or a Deputy Secretary, attending official functions. The Integrity Director should be consulted where senior executives would like to discuss a guest accompanying them to a particular event.

Conferences

ACMI can accept free or discounted travel or accommodation to a conference or similar event if you are giving an official presentation (or similar) on ACMI’s behalf. Such offers must:

- come directly from the conference’s organiser or sponsor; and
- align with the community’s expectations for public sector employees.

Step 4: Obtaining approval to accept a non-token offer

You can consider accepting a non-token offer if it passes the Integrity Test and your manager gives their approval.

You should obtain ...	by ...
prior approval from your manager as the standard practice	<p>emailing your manager the details of the offer, including:</p> <ul style="list-style-type: none"> • how it passes the Integrity Test • why it benefits ACMI
retrospective approval from your manager <u>if prior approval is not possible</u> (e.g. in the case of certain gifts or on-the-spot hospitality)	<p>recording the offer and your reason for acceptance on the internal register, then submitting it to your manager for review via the system’s automatic workflow.</p>

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Step 5: Recording a non-token offer on the internal register

You must formally record all non-token offers – both accepted and declined – on the internal register. When recording a non-token offer, you must:

- provide an accurate description of the Gifts, Benefits or Hospitality
- enter a reasonable estimate of its value.

For accepted offers, you must also:

- attest to having conducted the Integrity Test
- explain the business reason for acceptance (see **Part B** of the Integrity Test) and how it links to your work plan and priorities
- upload evidence (e.g. a copy of the ticket) to support your entry.

If you record an accepted offer on the internal register ...	your manager will receive ...
after obtaining approval from your manager (as is the standard)	a notification and link to the entry.
before obtaining approval from your manager	a notification and link to review the entry.

Joint offers

If multiple employees receive the same offer, each employee must comply with this policy by individually:

- conducting the Integrity Test (if considering acceptance)
- obtaining managerial approval (if applicable)
- recording the offer on ACMI's internal register (if applicable).

Managing generic offers of gifts, benefits and hospitality

You may receive generic offers of non-token gifts and benefits, such as:

- emails giving you discounted access to a seminar or webinar
- targeted email blasts (e.g. 'personalised' emails about upcoming events sent to newsletter subscribers – note that some entities may use generative artificial intelligence to make their emails appear unique)
- spam emails.

If you answer 'no' to all the following questions, you have likely received a generic offer:

- Do I have a relationship with the person or organisation that sent the email?
- Does the offer relate to my work – or that of my area – within ACMI?

You do not need to register a generic, non-token offer if you decline it. Should you wish to accept such an offer, you must apply the Integrity Test and comply with this policy.

If you need help with a generic offer, talk to your manager.

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Ownership of gifts offered to workplace participants

Non-Token gifts accepted by a workplace participant for their work or contribution may be retained by the workplace participant where their manager or authorised delegate has provided written approval. Workplace participants must transfer to ACMI official gifts or any gift of cultural significance or significant value (over \$50).

Repeat Offers

Receiving multiple offers (Token or Non-Token) from the same person or organisation can generate a stronger perception that the person or organisation could influence you. Individuals should refuse repeat offers from the same source if they create a conflict of interest or may lead to reputational damage. If you receive a repeat offer you wish to accept, discuss it with the Director of Finance & Governance or Governance Advisor before accepting.

Ceremonial gifts

Ceremonial gifts are official gifts provided as part of the culture and practices of communities and government, within Australia or internationally. Ceremonial gifts are the property of the ACMI, irrespective of value, and should be accepted by individuals on behalf of ACMI. The receipt of ceremonial gifts should be recorded on ACMI register but this information does not need to be published online.

Obtaining approval to accept a non-token offer

You should obtain:	By:
prior approval from your manager as the standard practice	emailing your manager the details of the offer, including: how it passes the relevant Integrity Test/s why it benefits ACMI.
retrospective approval from your manager if prior approval is not possible (e.g. in the case of certain gifts or on-the-spot hospitality)	recording the offer and your reason for acceptance on the internal register, then emailing your manager the details of the offer for their review.

Recording non-token offers on the internal registers.

You must formally record all non-token offers – both accepted and declined – on the internal register:

- [For Gifts, Benefits & Hospitality](#)
- [For Official Business Events](#)

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Providing of gifts, benefits and hospitality

Requirements for token and non-token offers

We sometimes provide Gifts, Benefits or Hospitality to:

- welcome significant guests
- celebrate important milestones and work-related achievements
- further the development of important business relationships and public sector outcomes.

Any offer we make must ...	This means we must ...
have a legitimate business reason.	ensure the offer: <ul style="list-style-type: none"> • furthers ACMI's organisational goals • supports the Victorian Government's policy objectives.
not present an unmanageable conflict of interest.	identify, declare and effectively manage any actual, potential or perceived conflicts of interest relating to the offer.
<ul style="list-style-type: none"> • be proportionate to the benefits obtained for ACMI and the Victorian Government • align with community expectations for public sector employees. 	<ul style="list-style-type: none"> • ensure the offer's cost does not exceed the value or significance of its intended outcomes • maximise cost effectiveness and efficiency • prioritise public sector venues over private venues • be confident that we can adequately justify the offer and its cost to the Secretary, an auditor, or the public.

When providing hospitality, all employees must demonstrate professionalism in their conduct and uphold their obligation to extend a duty of care to other participants.

Providing offers to employees

When offering ...	you must ...
appreciation gifts	ensure they are appropriate, given the context (no alcohol).
hospitality, such as end-of-year events	contact your Director of People & Culture for advice.

Providing offers to external stakeholders

When offering ...	you must ...
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official gifts or items	make reasonable enquiries to ensure it is appropriate to do so.
hospitality	<ul style="list-style-type: none"> • ensure that any event involving the service of alcohol: <ul style="list-style-type: none"> ○ provides drinks as a courtesy, not as an indulgence ○ does not exceed 2 hours in duration ○ does not cater for more than 2 standard drinks per person ○ is held at a time that limits the risk of employees returning to work.

Obtaining approval to provide gifts, benefits and hospitality

When providing Gifts, Benefits or Hospitality to employees or external stakeholders, we must comply with the [Procurement Policy & Procedures](#).

This includes obtaining written approval in advance from the appropriate financial delegate via:

- email for lower cost offers purchased using a corporate card or claimed as an expense
- a procurement brief or event brief for higher cost offers.

We must also exclude tips and gratuities from hospitality expenditure.

Related policy, legislation and other documents

- [Minimum Accountabilities for the Management of Gifts, Benefits and Hospitality](#)
- [ACMI's Conflict of Interest policy](#)
- [Public Administration Act 2004 \(Vic\)](#)
- [Code of Conduct for Victorian Public Sector Employees 2015](#)
- [Code of Conduct for Directors of Victorian Public Entities 2024](#)
- [Victorian Public Sector Commission's Gifts, Benefits and Hospitality Policy](#)
- [ACMI's Enterprise Agreement](#)
- [ACMI's Financial Code of Practice](#)
- [ACMI's Procurement Policy](#)
- [ACMI's Public Interest Disclosure Guidelines and Procedures](#)

Breaches

If you think you have breached this policy, you must notify your manager in writing immediately.

Speaking up

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Speaking up about any wrongdoing that we see – including matters relating to this policy – is key to building a robust integrity culture.

You can report actual or potential policy breaches (past or active), and any other related concerns to your manager or supervisor.

ACMI will:

- actively support and protect employees who speak up in good faith about potential policy breaches
- take decisive action, including possible disciplinary action, against anyone who discriminates against or victimises an employee who speaks up about potential policy breaches in good faith.

Making a report to an integrity body

If you believe corrupt or improper conduct has occurred, is occurring or may occur, you can make a complaint directly to [IBAC](#) or the [Victorian Ombudsman](#) under the [Public Interest Disclosures Act 2012 \(Vic\)](#). Such an allegation is known as a Public Interest Disclosure (PID).

For further information about what constitutes a PID, how to make a PID and what protections may apply, please refer to ACMI's [PID procedure](#).

How ACMI will respond

ACMI will respond to alleged breaches of this policy in a fair, reasonable, constructive and proportionate way that is consistent with the [Public Administration Act 2004 \(Vic\)](#), the VPSC's Code of Conduct, this policy and any other relevant obligations.

Depending on the circumstances, ACMI may:

- take no action; or
- deal with the matter by taking disciplinary action:
 - on an informal basis (e.g. through education or counselling)
 - through a formal performance management process
 - through a formal misconduct process (if other methods are not appropriate).

A finding of misconduct may amount to a breach of the VPSC's Code of Conduct and could result in termination per ACMI's [Workplace Behaviours Policy](#).

If ACMI identifies actual or potential criminal or corrupt conduct, it will take action in accordance with its reporting requirements under the [Fraud, Corruption & Other Losses Policy & Procedures](#). This may include referring the matter to Victoria Police and notifying oversight bodies, such as IBAC.

Relevant laws and obligations

ACMI will administer this policy in accordance with the relevant requirements, including the:

- [Public Administration Act 2004 \(Vic\)](#)
- [Privacy and Data Protection Act 2014 \(Vic\)](#)
- [Public Records Act 1973 \(Vic\)](#)
- [Charter of Human Rights and Responsibilities Act 2006 \(Vic\)](#).

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More information and advice

You can also refer to the following resources:

- [Litmos Learning Library modules](#)
- [Conflict of Interest Policy & Procedures](#)
- [Procurement Policy & Procedures](#)
- [Fringe Benefits Tax guidelines](#)
- [ACMI opening events stakeholder hosting notes](#)
- [Workplace Behaviours Policy](#)
- [Public Interest Disclosure Guidelines & Procedures](#)

Contacts for further information

A conflict of interest resulting from the acceptance of a gift, benefit or hospitality is not always clear to those who have them. Workplace participants who are unsure about the acceptance of a gift, benefit or hospitality, or the application of this policy, should ask their manager, the Director of People & Culture, the Director of Finance & Governance or ACMI's Governance Advisor for advice.

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Approval and review

This policy is subject to annual review. The Director of Finance & Governance and the Director of People & Culture are responsible for facilitating this review. All enquiries and proposed changes to this policy should be directed to either the Director of Finance & Governance or the Director of People & Culture.

The table below sets out the history of reviews and amendments to this policy:

Version	Board Mtg	Date	Resolution	Review/Amendments
1.0	149	13/05/2021	628	Compliance review conducted and consequential amendments made. Review/Amendment history added. New template.
2.0	156	23/06/2022	674	Compliance review conducted. Minor amendments made, including addition of “integrity” principle.
3.0	162	29/6/2023	705	No changes – reviewed against the Public Administration Act 2004 (Vic), the Code of Conduct for Victorian Public Sector Employees and the Code of Conduct for Directors of Victorian Public Sector Entities.
4.0	##	##	##	Amendments to align with new Department policy

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Appendix A – VPSC Minimum Accountabilities**Public officials offered gifts, benefits and hospitality**

1. Do not, for themselves or others, seek or solicit gifts, benefits and hospitality.
2. Refuse all offers of gifts, benefits and hospitality that:
 - are money, items used in a similar way to money, or items easily converted to money;
 - give rise to an actual, potential or perceived conflict of interest;
 - may adversely affect their standing as a public official or which may bring their public sector employer or the public sector into disrepute; or
 - are Non-Token Offers without a legitimate business benefit.
3. Declare all Non-Token Offers (valued at \$50 or more) of gifts, benefits and hospitality (whether accepted or declined) on their organisation's register, and seek written approval from their manager or organisational delegate to accept any Non-Token Offer.
4. Refuse bribes or inducements and report inducements and bribery attempts to the head of the public sector organisation or their delegate (who should report any criminal or corrupt conduct to Victoria Police or the Independent Broad-based Anti-corruption Commission).

Public officials providing gifts, benefits and hospitality

1. Ensure that any gift, benefit and hospitality is provided for a business purpose in that it furthers the conduct of official business or other legitimate organisational goals, or promotes and supports government policy objectives and priorities.
2. Ensure that any costs are proportionate to the benefits obtained for the State, and would be considered reasonable in terms of community expectations.
3. Ensure that when hospitality is provided, individuals demonstrate professionalism in their conduct, and uphold their obligation to extend a duty of care to other participants.

Heads of public sector organisations

1. Establish, implement and review organisational policies and processes for the effective management of gifts, benefits and hospitality that comprehensively address these minimum accountabilities.
2. Establish and maintain a register for gifts, benefits and hospitality offered to public officials that, at a minimum, records sufficient information to effectively monitor, assess and report on these minimum accountabilities.
3. Communicate and make clear within the organisation that a breach of the gifts, benefits and hospitality policies or processes may constitute a breach of binding codes of conduct and may constitute criminal or corrupt conduct, and may result in disciplinary action.
4. Establish and communicate a clear policy position to business associates on the offering of gifts, benefits and hospitality to employees, including possible consequences for a business associate

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acting contrary to the organisation's policy position. This must take into consideration any whole of Victorian Government supplier codes of conduct.

5. Report at least annually to the organisation's audit committee on the administration and quality control of its gifts, benefits and hospitality policy, processes and register. This report must include analysis of the organisation's gifts, benefits and hospitality risks (including repeat offers from the same source and offers from business associates), risk mitigation measures and any proposed improvements.

Publish the organisation's gifts, benefits and hospitality policy and register on the organisation's public website (applies only to organisations with an established website). The published register should cover the current and the previous financial year.

Appendix B – Flowchart

