

# Gifts and Benefits Policy

Approved by BG&E Resources' Audit & Risk Management Committee (ARC)

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# 1. Purpose

BG&E Resources Pty Ltd (“BGER”) (“the Company”), ABN 94 628 465 056, is an employee-owned, multidisciplinary engineering and ESG advisory consultancy, delivering technical solutions for clients in the Resources, Energy and Industrial sectors. We are united by our purpose – together, we embrace ambition and innovation to solve complex problems, engage communities and transition all to a nature-positive future – and committed to helping clients to decarbonise.

The Company is committed to upholding the highest business standards in all our business activities. This Gift and Benefits Policy (“Policy”) applies to all employees of BGER.

We recognise and accept that the occasional offer/acceptance of a modest gift or benefit such as entertainment or hospitality can make a valuable contribution to the development and maintenance of good business relationships. However, BGER employees may not solicit, give or receive, either directly or indirectly, gifts and benefits in relation to an individual or company with which we do business, if the benefit, could unduly influence the judgment of the recipient by creating a disproportionate obligation to return the favour or by creating an appearance of impropriety.

BGER employees need to be careful and assess what is expected in return when a gift or benefit is offered. If the gift or benefit places either party under an obligation, or appears to do so, then there is a problem. A gift or benefit that is designed to influence a business decision in the Company’s favour is a bribe.

The governance of our Gifts and Benefits Policy is overseen by the Company’s ARC.

## 2. Gifts and Benefits Definition

This Policy covers the following types of business courtesies exchanged with external parties:

- Gifts – any type of gift, whether pecuniary or not and including personal gifts.
- Benefits – any type of entertainment (attendance at social, cultural or sporting events) and/or hospitality (meals, drinks, as well as lodging and travel expenses).

The third party involved in an exchange, such as a client, may be subject to more restrictive gifts, entertainment and/or hospitality policies, than those of BGER.

For more information in relation to gifts of goods and services, as well as cash, please refer to the Company's Anti-Bribery and Corruption Policy.

### 3. Assessing Acceptability

When assessing what is and is not acceptable, BGER employees should consider the guidelines below.

Unacceptable	<ul style="list-style-type: none"> <li>• Anything that is illegal or breaks the law.</li> <li>• Any cash or cash equivalents, such as gift vouchers, shares, or other items redeemable for cash, regardless of the amount involved.</li> <li>• Anything that is extravagant or does not correspond in size or extent to the occasion.</li> <li>• Anything that could affect or appear to affect the recipient's business judgment.</li> <li>• Anything that is not aligned to the Company's ethical business practices (e.g. sexual favours, and events at sexually-oriented clubs).</li> <li>• Anything offered to someone who is about to make a business decision for the Company, for example the award of a contract.</li> <li>• Anything that would damage our reputation if publicly reported, either locally or internationally.</li> <li>• Anything that contravenes the recipient's internal rules and standards, including government officials who are subject to stringent regulation.</li> <li>• Any gift or benefit that has to be kept secret from other colleagues, an employee's Manager or any other relevant stakeholders.</li> </ul>
Needs Consideration and Approval	<ul style="list-style-type: none"> <li>• Travel expenses of third parties involving flights and overnight stays.</li> <li>• The inclusion of partners at entertainment or hospitality events.</li> <li>• Invitations to particularly expensive cultural or sporting events, such as World Cups, Olympics, etc.</li> <li>• Gifts on special occasions, such as births and weddings, etc.</li> </ul>
Acceptable	<ul style="list-style-type: none"> <li>• Modest, occasional gifts and/or meals with a business associate/partner that fall within the Company's financial limits</li> <li>• Small corporate, promotional gifts – for example, branded merchandise such as pens, umbrellas, etc.</li> <li>• Occasional attendance to ordinary sporting or cultural events, such as theatre performances or concerts.</li> </ul>

#### Other Considerations

Apart from monetary value, employees must also take into account the need to avoid anything that could be interpreted as an 'undue influence', even if the gift is of low monetary value. You also need to consider the frequency and cumulative value of exchanges with the same person or organisation. It is not acceptable to keep offering gifts and benefits to the same recipient or receive repeated business courtesies from the same person, even if each individual gift is of low value.

Employees should ensure that business associates/partners, including contractors bidding for business, understand and are aware of this Policy.

## 4. Registration and Approval Process

All gifts and benefits exceeding \$100 (standard business practice in Australia) must be approved by the employee's Manager.

Please note:

- Managers who approve business courtesy exchanges or sign-off on expense claims for similar, must have more seniority than the employee submitting the request or claim.
- When BGER offers a gift or benefit, such as lunch, the most senior BGER employee present is responsible for paying any onsite costs and for ensuring registration occurs.
- An employee who receives a gift or benefit, is responsible for seeking approval.

The Company's Gifts and Benefits Register is available for all employees to contribute via BGER's intranet.

## 5. Reporting Concerns and Violations

BGER's business operations are conducted using a fair, ethical and transparent approach. We encourage an open and honest workplace and promote a no-blame culture. We will not retaliate, persecute, or punish any person in any way who, in good faith, raises any concerns or makes a notification or report of real or perceived breaches/violations of this Policy.

Employees can report issues of bribery or corruption by:

- contacting or speaking to their Manager;
- contacting or speaking to any of the Directors or Members of the Executive Leadership Team;
- contacting or speaking to the Director, Environmental, Social & Governance and Development; and
- contacting or speaking to any of Members of the ARC.

We also encourage our clients and stakeholders to report and express their concerns relating to our employee' behaviours and suspected violations of this Policy.

For further details about the Company's Gifts and Benefits Policy, please contact:

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