

GIFTS, BENEFITS AND HOSPITALITY POLICY

1. Purpose

When South East Water employees perform public duties, it is vital that decision-making is impartial, transparent and accountable. This helps maintain public trust, prevents corruption and supports the effective management of integrity, financial and reputational risks.

Employees may be required to provide, or may be offered, gifts, benefits or hospitality in the course of their work. This Policy sets out how South East Water and its employees must respond to the provision and receipt of gifts, benefits and hospitality in a manner that complies with the Financial Management Act 1994, the Standing Directions 2018 and the Victorian Public Sector Commission's Minimum Accountabilities.

For the purposes of this Policy:

- *Gifts* are free or discounted items, services or opportunities received or provided as part of an employee's role at South East Water
- *Benefits* include preferential treatment, access or advantages not generally available
- *Hospitality* includes meals, events, accommodation or travel

2. Scope of Policy

This Policy applies to all South East Water and Iota workplace participants (directors, employees, fixed term workers, students, contractors, consultants and labour hire employees required as part of their contract or through agreement, notification or instruction to comply with this policy), who provide or are offered gifts, benefits or hospitality as a result of their role with South East Water.

For ease of reading, the term 'employee' is used to cover anyone the policy applies to, as set out above, regardless of their employment or engagement status.

3. Policy Statement

In applying the policy, South East Water is committed to and will uphold the principles outlined in the Minimum Accountabilities for the management of gifts, benefits and hospitality issued by the Victorian Public Sector Commission. The Minimum Accountabilities are binding on South East Water under the Instructions supporting the Standing Directions 2018¹. This policy is based on the Victorian Public Service Commission's (VPSC) [Minimum Accountabilities](#).

This Policy must be read in conjunction with the Gift, Benefit and Hospitality Procedure (the Procedure), which sets out mandatory processes and controls to support the implementation of the Policy. Compliance with the Procedure is mandatory for all employees; refer to the Procedure for guidance on complying with the Minimum Accountabilities.

4. Responsibilities

When doing work for South East Water, no matter what that work is, employees must act with integrity and impartiality consistent with the South East Water [Code of Conduct](#) and the [Code of Conduct for Victorian Public Sector Employees](#). We encourage all employees to assist South East Water in developing a culture of 'Thanks is enough' with the aim of moving to a workplace in which offers are not accepted even if they are permitted under this policy.

In addition, individuals and groups across the organisation have specific responsibilities they are expected to undertake:

Responsible Officer/s	Responsibilities
Managing Director	The Managing Director is required to fulfil their obligations under the Minimum Accountabilities and the Financial Management Act 1994 as the <i>Accountable Officer</i>. The Managing Director Should: • Ensure South East Water develops policies and procedures that apply the Minimum Accountabilities • Model good practice and foster a culture of integrity • Establish, implement and review organisational policies and processes for the effective management of gifts, benefits and hospitality • Ensure the Policy adequately addresses the minimum accountabilities • Ensure appropriate reporting to the South East Water Board of Directors on gifts, benefits and hospitality risks and trends
Directors/ Board	Directors are required to: • Provide oversight of the effectiveness of this Policy and associated processes by regularly reviewing annual and quarterly reporting • Comply with the Policy and declare offers in accordance with the Gifts, Benefits and Hospitality Procedure.
General Managers & Group Managers	Managers with direct reports must also: • Be aware of the gifts, benefits and hospitality risks inherent in direct reports roles • Oversee direct reports compliance with the Policy • Promote awareness and give advice; and • Model good practice
Risk, Assurance and Compliance	The Risk, Assurance and Compliance team will ensure: • That a register of responses to offers is maintained and regularly reviewed for risks of non-compliance to this Policy • That the Finance, Assurance and Risk Management Committee and Board of South East Water are provided with an annual review of the operation of the Policy and registrations
Employees	Employees are required to: • Declare all non-token offers (offers valued at \$50 or more) in writing to their manager, even if it is refused and complete an Offer Declaration Form

	• Refuse an offer unless it complies with the 'Offers you must Refuse – Integrity Test'. Refer to BS2570 Gifts Benefits and Hospitality Procedure for more information • Ensure they do not solicit gifts, benefits or hospitality under any circumstances
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5. Receiving and Declining Offers

Employees are required to comply with the Minimum Accountabilities when responding to all offers of gifts, benefits or hospitality, including offers from other public sector organisations. Approval requirements, including monetary thresholds and escalation arrangements, apply to the acceptance or provision of gifts, benefits or hospitality and are set out in the Gifts, Benefits and Hospitality Procedure.

6. Providing to Others - Integrity Test

When providing a gift, benefit or hospitality on behalf of South East Water, employees must ensure the following:

Requirement	Description
Business reason	There must be a legitimate business benefit that furthers the conduct of official business or other legitimate goals of South East Water, the public sector or the state
No Conflict of Interest	It does not raise a conflict of interest (actual, potential or perceived)
Proportionate costs	Any costs incurred are proportionate to the benefits obtained.
Consistent with community expectation	The provision of the gift, benefit or hospitality would be considered reasonable and consistent with community expectations.

Refer to BS2570 Gifts Benefits and Hospitality Procedure for guidance on applying the HOST test (Hospitality, Objectives, Spend and Trust).

7. Breaches

South East Water will respond to alleged breaches of this Policy consistent with relevant industrial instruments, legislation and any other obligations that apply. Our response will be fair, reasonable and proportionate. In some instances, no action will be taken. In others, we will deal with the matter on an informal basis, through a performance management process or similar, or if other methods are not appropriate, through a misconduct process.

A finding of misconduct may amount to a breach of the Code of Conduct. Serious misconduct can result in termination of employment. Contractors may be subject to contract renegotiation or termination. If a criminal offence may have occurred, the Victorian or Federal Police may investigate and prosecute.

If an employee believes they have breached this policy, they are required to notify their manager in writing immediately. This enables us to assess how best to mitigate the risk.

8. Speak up



We encourage all employees to speak up if a breach of this Policy has happened, is happening or could happen. Employees can notify their manager or the Compliance Manager in the Risk, Assurance and Compliance team.

If an employee believes corrupt or improper conduct is occurring, they can make a complaint directly to the Independent Broad-based Anti-corruption Commission (IBAC), the Victorian Ombudsman or [Stopline](#) who provide an independent and confidential helpline to raise concerns relating to allegations of fraud, corruption or other improper conduct within the workplace.

In alignment with the Fraud, Corrupt Conduct and Other Losses Policy and the Allegations Policy, South East Water will:

- actively support and protect employees who speak up in good faith
- take decisive action, including possible disciplinary action, against anyone who discriminates against or victimises an employee who speaks up in good faith
- respond in a constructive manner to the information provided.

9. Advice

If employees are unsure about accepting a gift, benefit or hospitality, or the application of the Policy or the Gifts, Benefits and Hospitality Procedure they can seek advice from their manager or the Compliance Manager in the Risk, Assurance and Compliance Team.

10. Related Policies

- BS 1005 Code of Conduct
- BS 2725 Gift Benefit and Hospitality Guidance
- BS 2570 Gift Benefit and Hospitality Procedure
- BS 2809 Allegations Policy
- BS 2173 Fraud, Corruption and Other Losses Policy

11. Legislation and Related Documents

- Financial Management Act 1994 (Vic)
- Freedom of Information Act 1982 (Vic)
- Privacy and Data Protection Act 2014 (Vic)
- Public Interest Disclosures Act 2012 (Vic)
- Public Administration Act 2004 (Vic)
- Water Act 1989 (Vic)
- Code of Conduct for Victorian Public Sector Employees
- Code of Conduct for Directors of Victorian Public Entities

12. Accountability

The Managing Director is accountable to the Board of Directors for ensuring this Policy is implemented. The Risk, Assurance and Compliance team will ensure this Policy is reviewed at least every two years, or earlier if required to reflect changes to legislation, the Standing Directions or VPSC guidance.

13. Approval

Approved by: South East Water Board of Directors
Approved on: 23 June 2026
Sponsor: Managing Director
Owner: Compliance Manager
Review date: 23 June 2028

ⁱ The Standing Directions 2018 are issued by the Minister for Finance under section 8 of the Financial Management Act 1994.