

ANTI-BRIBERY AND CORRUPTION

The South West Sydney Academy of Sport takes a zero-tolerance approach to bribery and corruption and is committed to conducting our business with integrity and high ethical standards. Bribery and corruption are a breach of our Code of Conduct and will not be tolerated.

Bribes

South West Sydney Academy of Sport team members are not permitted to give, offer, promise, accept, request, or authorise a bribe, to or from any person in order to influence them corruptly or improperly in the exercise of their duty.

Gifts and Hospitality

Giving and receiving gifts or hospitality is a normal and important part of developing and maintaining business relationships. However, all gifts and hospitality should be reasonable and given in the ordinary course of business.

Lavish or unreasonable gifts or hospitality, whether these are given or received, are unacceptable and can create the impression that the Academy is trying to obtain or receive favourable business treatment by providing individuals with personal benefits.

Team members must declare and report gifts and / or benefits, either offered or accepted and valued at \$50 or more, in the *Gift and Entertainment Register* held by the delegated finance officer.

Employees should notify the Academy CEO of the fact that they have received the gift or benefit and must make the entry within 5-working days of receiving / being offered the gift or benefit. If it is known in advance, the receipt of the gift or benefit should be discussed with the CEO prior to acceptance. Gifts should not be accepted on a re-occurring basis.

Gifts and genuine hospitality and entertainment expenditure that is reasonable and proportionate is allowable provided it complies with the following:

- *Made for the right reason* – it should be clearly given as an act of appreciation or common courtesy associated with the standard business practice.
- *No obligation* – it does not place the recipient under any obligation.
- *No expectation* – expectations are not created by the giver or an associate of the giver or have a higher importance attached to it by the giver than the recipient would place on such a transaction.
- *Made openly* – if made secretly and undocumented then the purpose will be open to question.
- *Reasonable value* – its size is small and in accordance with general business practice.

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- *Appropriate* – its nature is appropriate to the relationship and circumstances. For example, we may give and receive gifts at Christmas time.
- *Timely* – all gifts / hospitality should be given and received at an appropriate time.
- *At “arm’s length”* – all transactions / gifts should be at an “arm’s length” basis with no special favours and no special arrangements.
- *Legal* – it complies with relevant laws.
- *Documented* – the expense or gift, if valued at \$50 or more, is fully documented in the *Gift and Entertainment Register*.

These are never acceptable:

- Gifts in the form of cash and / or cash equivalent vouchers or gift certificates.
- “*Quid pro quo*” (a benefit or advantage offered for something in return).
- Gifts or hospitality offered or accepted from any Athletes/ customers/ stakeholders or suppliers if we engage in a tendering or contracting/negotiation process with them.
- Entertainment of a sexual or similarly inappropriate nature.
- Making incomplete, false, or inaccurate entries in the South West Sydney Academy of Sport’s books and records, e.g., *Gift and Entertainment Register*.

Acceptable Gifts and Hospitality

Team members may:

- Accept token gifts / benefits where the gifts / benefits are offered in business situations or to all participants and attendees (e.g., seminars, conferences, trade, and business events). These items are not given as a personal gift for use outside the business environment, and a reasonable person would not perceive token gifts as items designed to influence or win favours. Token gifts could include pen, cap, stationery, coffee mug, stress ball, mouse pad, corporate umbrellas, and memory sticks. You do not need to declare and report token gifts on the *Gifts and Entertainment Register*.
- Accept a gift / benefit for presenting at a conference, seminar, and / or business event. You must declare and report the gift / benefit on the *Gifts and Entertainment Register* if a reasonable person would value the gift over the amount of \$50
- Accept a ceremonial gift from another organisation on behalf of the South West Sydney Academy of Sport. Ceremonial gifts belong to the South West Sydney Academy of Sport. You must declare and report the item on the *Gifts and Entertainment Register* and arrange to display the item in the South West Sydney Academy of Sport office where appropriate.
- Accept a gift / benefit given in gratitude when hosting business events or overseas delegations only where refusal would be unreasonable and unnecessarily offensive. You must declare and report the gift / benefit on the *Gifts and Entertainment Register*.
- Accept light refreshments (e.g., tea, coffee, water, juice) or a modest meal during a meeting or as a participant of a working or networking group. This is considered a basic courtesy, and under similar circumstances the South West Sydney Academy of Sport would reciprocate by providing similar light refreshments/modest meals to attendees at meetings or working or

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networking groups hosted by the South West Sydney Academy of Sport. You do not need to declare and report basic courtesy on the *Gifts and Entertainment Register*.

Travel, accommodation and living expenses sponsored by private organisations or groups either while the team member is working or on leave, needs to be approved by the CEO before being accepted. In general, sponsored travel will only be rarely approved.

Facilitation Payments

Facilitation payments are payments, no matter how small, given to an official to increase the speed at which they do their job. All facilitation payments are prohibited.

Political Contributions

The South West Sydney Academy of Sport does not make political donations to any political party, politician, or candidate for public office unless the donation has been approved in advance by the Board.

Attendance at party-political functions is permitted where there is a legitimate business reason. Attendance at these functions must be approved by the CEO.

The South West Sydney Academy of Sport engages in debate on policy and shares its view on policy matters which relate to the South West Sydney Academy of Sport’s business and activities. This activity may only be done by the authorised CEO, or authorised Board Member.

Charitable Contributions

Charitable support and donations are acceptable whether of in-kind services, knowledge, time, or direct financial contributions. However, team members must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery.

The Academy only makes charitable donations that are legal and ethical under local laws and practices. In Australia, this means that an organisation must have deductible gift recipient status with the Australian Taxation Office. This status makes the organisation entitled to receive income tax deductible gifts and deductible contributions.

Insider Trading

In addition to the Academy’s general obligation to observe the law, one of the most important responsibilities of all South West Sydney Academy of Sport team members is to protect the Academy’s reputation for ethical and honest dealing. Its reputation could be irreparably damaged if inside information is inappropriately disclosed such that it affects the stock price of our Academy or that of a customer or any other Academy with whom we have a relationship.

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Bearing this in mind, you are forbidden from sharing or disclosing Academy information in any way that could be deemed insider trading or give the appearance of such conduct.

Consequences

Any breach of this policy is a serious matter which will be investigated and addressed by the South West Sydney Academy of Sport.

Disciplinary action will be taken against anyone who breaches this policy. Disciplinary action will depend on the severity of the breach but may include reprimands; formal warnings; demotions; dismissal.

Matters may also, depending on the circumstances, be referred to the police and result in jail, fines, and criminal convictions.

Reporting Concerns

The South West Sydney Academy of Sport is committed to ensuring that Academy team members can speak up with confidence if they have any concerns or need to ask for help.

If you suspect or observe anything you suspect may be bribery or corruption, raise your concerns with the CEO, or Academy Chairperson, or report your concerns under our Whistleblower policy.

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