

## Gifts, benefits and hospitality policy

Authorised by: Board

Status: Final Approved

Classification: Official

<b>Responsible executive:</b>	Chief Financial Officer and Head of Corporate Services
<b>Approval date:</b>	30 April 2025
<b>Review period:</b>	Every 3 years

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# 1. Introduction

The offer and exchange of gifts, benefits, and hospitality are common in business. However, when performing public duties, employees must maintain impartiality in their decisions to uphold trust and prevent corruption.

The Ports Victoria Gifts, benefits and hospitality policy provides guidance on how Ports Victoria and its employees, including directors, should manage the acceptance and provision of gifts, benefits, and hospitality. It defines boundaries, outlines the decision-making process, and highlights potential risks - helping to safeguard the reputation of both individuals and the organisation.

As part of this policy, Ports Victoria encourages a culture where 'thanks is enough'. This reflects a move towards a standard where offers are politely declined, even when permitted under the policy, to reinforce integrity and maintain public confidence in the organisation.

This policy has been informed by the Victorian Government's Gifts, benefits and hospitality model policy issued by the Victorian Public Sector Commission.

## 2. Scope

This policy applies to all Ports Victoria employees, including directors and contractors. It does not cover sponsorships or donations made by Ports Victoria.

## 3. Policy principles

### 3.1. Background

As a Victorian Government organisation, Ports Victoria must comply with:

- The Public Administration Act 2004 (Vic) (the Act) which specifies that public officials should demonstrate:
  - integrity by avoiding real or apparent Conflicts of Interest
  - impartiality by making decisions and providing advice on merit without bias, caprice, favouritism or self-interest
  - accountability by seeking to achieve best use of resources and submitting themselves to appropriate scrutiny
- The Code of Conduct for Victorian public sector employees and the Code of Conduct for Directors of Victorian Public Entities 2024.

As public trust depends on honest dealings, directors and employees must not accept gifts, benefits or hospitality from people who may seek to or inadvertently influence their decisions unfairly. Directors and employees must be mindful of this overlay and are expected to:

- Earn and sustain public trust
- Be honest, open and transparent in their dealings
- Make decisions without bias
- Avoid any real or apparent Conflicts of Interest
- Use their powers responsibly
- Report improper conduct
- Seek to achieve best use of resources
- Submit themselves to appropriate scrutiny.

## 3.2. Receiving offers of gifts, benefits and hospitality

### 3.2.1. Minimum accountabilities

Directors and employees of Ports Victoria must adhere to the following minimum accountabilities when responding to all offers of gifts, benefits, or hospitality including those received from other public sector organisations whether Token or Non-token (refer attachment 1 for definitions).

When offered gifts, benefits, or hospitality, directors and employees of Ports Victoria must:

- Must not seek or solicit gifts, benefits or hospitality for themselves or others
- Must refuse any offer that:
  - involves money, items used like money, or items easily converted to money
  - creates or may be perceived to create a conflict of interest that could influence, or be seen to influence, the performance of their public duties
  - could undermine public confidence in their impartiality or in the impartiality of Ports Victoria or the broader public sector
  - is inconsistent with community expectations
  - is a non-token offer without a legitimate business benefit
  - could reasonably be viewed as a bribe or other form of inducement
- Declare all offers and outcomes for non-token gifts, benefits and hospitality (whether accepted or declined) in the Gifts, benefits and hospitality register and seek written approval from their manager when any non-token offer (valued at \$50 or more) is accepted. Non-token offers can only be accepted if they have a legitimate business benefit
- Seek advice from the Chairman, in the case of directors, or for employees, their manager and Division Head if they are unsure about how to respond to an offer of a gift, benefit or hospitality.

The Gifts, benefits and hospitality policy and register are published annually on Ports Victoria's website for the current and the previous financial year.

Any offer that could be reasonably viewed as a bribe or other form of inducement must be reported to the Chief Executive Officer (CEO) or Chief Financial Officer (CFO) and Head of Corporate Services.

Suspected criminal and/or corrupt conduct will be managed by Ports Victoria in accordance with the Fraud, Corruption and Losses Prevention and Management Policy.

The CEO or CFO and Head of Corporate Services must report any suspected criminal or corrupt conduct to Victoria Police or the Independent Broad-based Anti-corruption Commission (IBAC).

The divide between a director's and employee's professional and personal life may not always be clear. Directors and employees must remain mindful at all times of external perceptions of their actions when receiving gifts, benefits and hospitality from any third party associated with Ports Victoria.

### 3.2.2. Official gifts

Official gifts and items include:

- Gifts given for official purposes
- Items with cultural, ceremonial, religious, historical, or other special meaning.

Official gifts are sometimes accepted or given by a public sector organisation when doing business with official delegates or representatives from a community group, organisation, or government.

Official gifts are gifted to and are the property of the Ports Victoria, irrespective of value, and should be accepted on behalf of Ports Victoria. The receipt of official gifts should be recorded on the Gifts, benefits and hospitality register but this information does not need to be published online.

### 3.2.3. Hospitality provided by Victorian public sector organisations

Victorian public sector organisations may provide hospitality to stakeholders while performing their official functions.

Directors and employees offered hospitality by a Victorian public sector organisation must consider the requirements outlined in the minimum accountabilities.

Hospitality accepted as part of official business does not need to be declared or reported, provided the attendance is consistent with Ports Victoria's functions and objectives and aligns with the attendee's official role or responsibilities.

### 3.2.4. Repeat offers

Receiving multiple offers, whether token or non-token, from the same person or organisation can increase the perception of potential influence.

Repeat offers from the same source should be declined if they create a Conflict of Interest or risk reputational harm to the employee or the public sector organisation.

### 3.2.5. Bulk/generic email offers

Offers that form part of a generic or bulk event invitation, such as those received via unsolicited or 'spam' email, do not need to be recorded if they are declined or ignored.

## 3.3. Acceptance guidelines

Ports Victoria recognises that accepting gifts, benefits or hospitality may be warranted in some circumstances. Directors and employees:

- May accept gifts, benefits, or hospitality in limited circumstances, where assessed as appropriate
- Are encouraged to build professional and effective relationships with suppliers, contractors, consultants, and key stakeholders to enhance Port Victoria's reputation and support its success
- May attend networking events that are typical and standard practice within the industry, where relevant to their roles
- Must record attendance at networking events on the Gifts, benefits and hospitality register if the event has a nominal value of \$50 or more
- Should recognise the value of networking events for professional development, staying informed on industry trends, and strengthening engagement with key stakeholders
- Are expected to maintain appropriate interactions with external parties as part of Port Victoria's business, while avoiding any situation that could compromise or appear to compromise their integrity or impartiality
- Must avoid real or perceived Conflicts of Interest, particularly when involved in purchasing, managing tenders and evaluations, negotiating leases, or dealing with licence applications with Ports Victoria
- Before accepting any gifts, benefits or hospitality, consider the following questions in the GIFT test. The GIFT test provides a broad framework in determining the appropriateness of gifts, benefits and hospitality that may be offered to directors or employees. Refer to Attachment 2 for examples of application of the GIFT test.

G	Giver	Who is providing the gift, benefit or hospitality and what is their relationship to me? Is this gift, benefit or hospitality being offered to me in my role which requires me to select contractors, award grants, regulate industries or determine government policies? Could the person or organisation benefit from a decision I make?
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I	Influence	Are they seeking to influence my decisions or actions? Has the gift, benefit or hospitality been offered to me publicly or privately? Is it a courtesy, token of appreciation or highly valuable? Does its timing coincide with a decision I am about to make?
F	Favour	Are they seeking a favour in return for the gift, benefit or hospitality? Has the gift, benefit or hospitality been offered honestly? Has the person or organisation made several offers over 12 months? Would accepting it create an obligation to return a favour?
T	Trust	Would accepting the gift, benefit or hospitality diminish public trust? How would I feel if the gift, benefit or hospitality becomes public knowledge? What would my colleagues, family, friends or associates think?

- A YES answer to any of the above may indicate that the gift, benefit or hospitality should be declined
- A NO answer to all the above may allow the employee to consider accepting the gift, benefit or hospitality
- Token offers are deemed to be inconsequential or of trivial value to both the receiver and the giver. They may generally be accepted, if they do not create a Conflict of Interest or lead to reputational damage. They cannot be worth more than \$50
- Non token offers (valued above \$50) can only be accepted if they have a legitimate business benefit. That is, when the offer furthers the conduct of official business or other legitimate goals of Ports Victoria, the public sector or the State. If it does not, the offer must always be declined.

### 3.3.1. Acceptance procedures for non token offers

After applying the GIFT test and confirming that accepting the gift, benefit, or hospitality will not compromise impartiality, integrity, or reputations, the following steps should be followed:

- The value of \$50 is considered the nominal threshold for determining whether a gift, benefit, or hospitality is reportable. Judgement should be used to assess if a lesser value may be more appropriate in specific circumstances
- In cases of cumulative offers from a single source, judgement should be applied to evaluate how these offers may be perceived
- Gifts, benefits, or hospitality with a value of \$50 or more: may be accepted, but only with approval:
  - for directors, approval must come from the Chairman
  - for employees, approval must come from their manager and Division Head
- Acceptance is only permitted when a legitimate business benefit exists
- Approval is sought through the submission and consideration of the Gifts, benefits and hospitality notification form
- The Gifts, benefits and hospitality notification form must:
  - be completed and approved within five business days of receiving the item, offer or invitation
  - note the actual value of the item if known, or an estimated value if the actual value is unknown
  - specify all relevant dates, including the date received, the date it was offered, and the date(s) of the associated event (e.g. meals, flights, accommodation)
  - be submitted to the Governance and Information Manager

- Any accepted gift with an estimated value of \$50 or more, should be handed to the Governance and Information Manager. Such gifts are retained by Ports Victoria and will be disposed of in accordance with this policy.

### 3.4. Declining offers

Directors and employees are required to decline gifts, benefits, or hospitality that do not meet the requirements of this policy or do not pass the GIFT test. They must:

- Decline offers politely and reference this policy when doing so
- Complete a Gifts, benefits and hospitality notification form if the declined offer has an actual or estimated value of \$50 or more
- Take appropriate action for any gift, benefit, or hospitality deemed inappropriate by:
  - returning the item to the giver with a written explanation, and
  - reporting the matter to their manager.

### 3.5. Procedure for the disposal of gifts

The Procedure for the disposal of gifts (the Procedure) applies to gifts handed to the Governance and Information Manager in accordance with this policy. The following guidelines apply to the use or disposal of such gifts:

- If Ports Victoria decides to retain a gift, it must be used for the benefit of the organisation or the public and in a manner that is appropriate
- If there is no appropriate use for the gift, it may be disposed of in line with the following guidelines:
  - disposal must be in the public interest and, where known, should consider the wishes and expectations of the donor
  - gifts may be donated to a charity, hospital, school, community group, non-profit organisation, or similar
  - gifts with historical or cultural significance may be offered to a public institution such as the Melbourne Museum, National Gallery of Victoria, or a similar body
  - at the discretion of the CEO, and excluding official gifts, items may be used to raise funds for charity or be awarded to employees in recognition of good performance
- All decisions made under this procedure must be endorsed by the CEO
- Details of any disposal must be recorded in the register.

### 3.6. Providing gifts, benefits and hospitality

#### 3.6.1. Provision considerations

Hospitality or the giving of gifts is often provided to welcome guests, facilitate the development of business relationships, further business outcomes and celebrate achievements. When planning to provide gifts, benefits or hospitality (Token or Non-token) Ports Victoria will:

- Apply the HOST Test

H	Hospitality	To whom is the gift or hospitality being provided? Will recipients be external business partners, or employees of the host organisation?
O	Objectives	For what purpose will the hospitality be provided? Is the hospitality being provided to further the conduct of official business? Will it promote and support government policy objectives and priorities? Will it contribute to employee wellbeing and workplace satisfaction?

S	Spend	Will public funds be spent? What type of hospitality will be provided? Will it be modest or expensive, and will alcohol be provided? Will the costs incurred be proportionate to and less than the benefits obtained?
T	Trust	Will public trust be enhanced or diminished? Could you publicly explain the rationale for providing the gift or hospitality? Will the event be conducted in a manner which upholds the reputation of the public sector? Have records in relation to the gift or hospitality been kept in accordance with reporting and recording procedures?

- Consider the nature of the gift, benefit or hospitality
- Seek to contain costs
- Ensure that the offer is less than the expected benefits
- Ensure consistency and transparency of treatment internally and externally.

### 3.6.2. Providing gifts, benefits or hospitality to external guests

As a government authority, Ports Victoria’s principal responsibility is to its shareholder, the Victorian Government, which represents the interests of all Victorians and the broader economy. In the normal course of business, Ports Victoria’s may provide gifts, benefits, or hospitality for the purpose of:

- Receiving or hosting guests
- Facilitating relationships
- Celebrating events or achievements
- Launching initiatives
- Raising awareness and generating interest
- Strengthening Ports Victoria’s reputation and brand.

### 3.6.3. Providing gifts, benefits or hospitality to employees

Employees are key to Ports Victoria’s business and contribute to its success. In some situations, giving gifts, benefits, or hospitality to employees can help by:

- Motivating employees
- Encouraging networking and collaboration
- Enhancing job satisfaction and strengthening corporate culture
- Supporting training and learning opportunities
- Rewarding and recognising performance.

### 3.6.4. Minimum accountabilities

When providing gifts, benefits, or hospitality Ports Victoria’s directors and employees must ensure:

- The gift, benefit, or hospitality is for a business purpose that supports official duties, legitimate organisational goals, or government policy objectives and priorities
- Any associated costs are proportionate to the benefit to the State and align with reasonable community expectations
- Their conduct remains professional and reflects a duty of care to all participants
- The provision does not create an actual, potential, or perceived conflict of interest.

### 3.6.5. Containing costs

Directors and employees should contain costs involved in the provision of gifts, benefits and hospitality wherever possible. Refer to the Attachment 3 for further guidance on the questions to ask and for examples of the HOST framework.

### 3.6.6. Providing alcohol

Ports Victoria hosted events will generally be alcohol free. Where the provision of alcohol is intended at a Ports Victoria hosted event the following parameters apply:

- The provision of alcohol must be approved by the CEO
- The event should be held at a time which minimises the risk of employees returning to work after consuming alcohol. For example, if normal office hours are worked, the event should be held in the late afternoon or early evening
- The event should not exceed two hours in duration
- No more than two standard drinks per person should be provided
- The provision of alcohol should be incidental to the overall level of hospitality provided.

## 4. Alleged breaches

Employees who consider that gifts, benefits and hospitality may not have been declared or is not being appropriately managed should speak up and notify their manager or the CEO. Management will take decisive action, including possible disciplinary action, against employees who discriminate against or victimise those who speak up in good faith.

Disciplinary action consistent with the relevant industrial instrument and legislation, including dismissal, may be taken where this policy has not been complied with. This includes where a director or employee fails to avoid wherever possible to identify, declare and manage a conflict of interest related to gifts, benefits and hospitality.

Actions inconsistent with this policy may constitute misconduct under the Public Administration Act 2004, which includes:

- Breaches of the binding Code of Conduct for Victorian Public Sector Employees, such as sections of the Code covering conflict of interest, public trust and gifts and benefits; and
- Directors and employees making improper use of their positions
- Actions inconsistent with this policy may also constitute improper conduct under the Public Interest Disclosures Act 2012 and employees should refer to Ports Victoria's Public Interest Disclosures Procedures.

Employees wanting to discuss this policy or managing breaches of this policy should contact their manager or the Governance and Information Manager.

## 5. Recording and reporting

Gifts, benefits and hospitality must be recorded in the Gifts, benefits and hospitality register where it is:

- Accepted and worth more than \$50
- Declined and worth more than \$50
- Provided and worth more than \$50
- An official gift.

Recording of accepted or declined items occurs in the register via the Gifts, benefits and hospitality notification form in accordance with acceptance procedures or requirements for declining offers.

Recording of provided hospitality greater than \$50 occurs in the register via the Gifts, benefits and hospitality notification form. In addition, hospitality expenditure is recorded and reported in accordance with whole of government financial management, accountability and reporting requirements.

The Governance and Information Manager administers the register and recording of gifts, benefits and hospitality.

Official gifts that are accepted may be recorded on the Assets Register, if relevant.

Declined offers of hospitality that are part of a generic, bulk event invitation (such as 'spam' email) or accepted hospitality provided by another Victorian public sector organisation are not required to be declared or recorded.

## 6. Accountabilities and responsibilities

### 6.1. Chief Executive Officer (CEO)

The CEO must:

- Establish, implement and review the Gifts, benefits and hospitality policy and processes for the effective management of gifts, benefits and hospitality that comprehensively address the minimum requirements of the Victorian Public Sector Commission (VPSC) policy framework
- Annually attest to having a Gifts, benefits and hospitality policy in place consistent with the VPSC policy framework
- Establish and maintain a register for gifts, benefits and hospitality offered to Ports Victoria directors and employees that, at a minimum, records sufficient information to effectively monitor, assess and report on the minimum requirements of the VPSC policy framework
- Communicate and make clear within Ports Victoria that a breach of the Gifts, benefits and hospitality policy or processes may constitute a breach of binding codes of conduct and may constitute criminal or corrupt conduct and may result in disciplinary action
- 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 acting contrary to Ports Victoria's policy position. This must take into consideration any whole of Victorian Government supplier codes of conduct
- Report at least annually to the Audit Committee on the administration and quality control of its Gifts, benefits and hospitality policy, processes and register. This report must include analysis of Ports Victoria'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 Ports Victoria's Gifts, benefits and hospitality policy and register on Ports Victoria's public website. The published register should cover the current and the previous financial year.

### 6.2. Board and Audit Committee

The Audit Committee shall review the Gifts, benefits and hospitality register quarterly for transparency purposes.

The Board shall approve the Gifts, benefits and hospitality policy.

Directors must ensure they are familiar with this policy and fulfil obligations to report offers of gifts, benefits and hospitality over the nominal value. It is important that directors consider the reporting of all offers even if they do not appear to relate directly to Ports Victoria.

Directors must understand that gifts, benefits and hospitality that are offered under an agreement between a third party and the organisation may attract fringe benefits tax. Guidance on the application of fringe benefits tax to the acceptance of gifts, benefits and hospitality should be sought from the CFO and Head of Corporate Services.

### 6.3. Executive leadership team (ELT) and Senior leadership team (SLT)

ELT and SLT members must:

- Verify that no recurring gifts or benefits from a single source are evident over time
- Promulgate and establish awareness and compliance with this policy to all employees, contractors, suppliers and consultants who enter contracts with Ports Victoria
- Where appropriate, approve the acceptance of gifts, benefits and hospitality and ensure that the notification forms are sent through to the Governance and Information Manager for inclusion on the register. Noting that any notification form must be co-signed by both the employee's manager and Division Head.

### 6.4. Employees

- Employees must be familiar with and comply with the policy and all associated procedures and the Code of Conduct.
- Employees must understand that gifts, benefits and hospitality that are offered under an agreement between a third party and the organisation may attract fringe benefits tax. Guidance on the application of fringe benefits tax to the acceptance of gifts, benefits and hospitality should be sought from the CFO and Head of Corporate Services.

### 6.5. Chief Financial Officer (CFO) and Head of Corporate Services

The CFO and Head of Corporate Services has overall responsibility for:

- Implementing the policy
- Recording and reporting expenditure in accordance with whole of government financial management, accountability and reporting requirements
- Monitoring the recording of any revenue from fees and grants on Ports Victoria's finance system
- Providing advice on potential fringe benefits tax on the acceptance of gifts, benefits and hospitality.

### 6.6. Governance and Information Manager

The Governance and Information Manager is responsible for the administration of the Gifts, benefits and hospitality register and for ensuring the forms are completed and authorised prior to information being entered.

## 7. Responsibility for policy

### 7.1. Approval level required

The Board is responsible for approving this policy.

### 7.2. Responsibility for implementation

The CFO and Head of Corporate Services has overall responsibility for implementation of the policy.

The Governance and Information Manager is responsible for the administration and maintenance of the process.

### 7.3. Review period

The policy will be reviewed every three years unless required sooner.

## 8. Related documents and legislation

No.	Title of supporting document
1.	Gifts, benefits and hospitality register
2.	Gifts, benefits and hospitality notification form
3.	Code of conduct for Victorian public sector employees
4.	Code of conduct for directors of Victorian public entities
5.	Fraud, corruption and other losses prevention and management policy
6.	Conflict of interest policy
7.	Public interest disclosures procedures
8.	Procurement policy and associated procedures and guidelines
9.	Delegations of authority policy
10.	Victorian Public Sector Commission's Gifts, benefits and hospitality policy guide
11.	Minimum accountabilities for the management of gifts, benefits and hospitality (see Instructions supporting the Standing Directions of the Minister for Finance)
12.	Public Administration Act 2004

## 9. Version history

Version	Date	Name	Reason
1.0	27 October 2021	Board	Approved by the Board
1.1	22 November 2023	Audit Committee	Reviewed/amended and submitted to 29 November 2023 Audit Committee
1.1	29 November 2023	Audit Committee	Approved by the Audit Committee for submission to the Board for approval
1.1	28 February 2024	Board	Approved by the Board
1.2	27 March 2025	Audit Committee	Approved by the Audit Committee for submission to the Board for approval
1.2	30 April 2025	Board	Approved by the Board

## Attachment 1 – Acronyms and definitions

Term	Definition
<b>Benefit</b>	Preferential treatment, favours or other advantage. For example, invitations to sporting, cultural or social events, access to discounts, or the promise of a new job.
<b>Business associate</b>	An individual, group or organisation that a public sector organisation has, or plans to have, a business relationship with or who may seek commercial or other advantage.
<b>Official gifts</b>	<p>Official gifts and items include:</p> <ul style="list-style-type: none"><li>• official gifts</li><li>• official items (items with cultural, ceremonial, religious, historic or other significance)</li></ul> <p>which are sometimes accepted or given on behalf of a public sector organisation as part of business with official delegates or representatives of a community group, organisation, or government.</p> <p>Official gifts were previously referred to as ‘Ceremonial Gifts’ in the earlier versions of the Gifts, benefits and hospitality policy.</p>
<b>Conflict of Interest</b>	<p>A Conflict of Interest exists when a private interest could influence, or reasonably be seen to influence, how public duties are performed.</p> <p>A Conflict can be:</p> <p><b>Actual</b> – There is a direct Conflict between their private interests and public duties.</p> <p><b>Potential</b> – They have a private interest that could foreseeably Conflict with their public duties in the future.</p> <p><b>Perceived</b> – It is reasonable for people to believe that their private interests could influence their public duties, either now or in the future.</p>
<b>Fundraising</b>	Raising money in a way that does not breach the minimum accountabilities because it is consistent with relevant law, government policy and codes of conduct issued by the VPSC.
<b>Gifts</b>	Items or services that are free, discounted, or would generally be seen by the public as a gift. For example: items such as vouchers, gift cards, artwork, chocolates or flowers; services such as car repair. The monetary value of a gift is the estimated monetary value of the item if it were not being provided either free or discounted. Remember that gift cards and vouchers must be treated the same as money under the minimum accountabilities.
<b>Gifts, benefits and hospitality register (the Register)</b>	The official record of all declarable offers of gifts, benefits and hospitality made to directors and employees, whether accepted or declined. It records the date, the gift, benefit or hospitality offered, information about the donor and recipient, the estimated value and how it was handled. For accepted offers, it details the business reason for acceptance and the officer approving the acceptance. The official record is published on the Ports Victoria website.
<b>Hospitality</b>	Ranges from light refreshment at a business meeting to expensive restaurant meals and sponsored travel and accommodation.

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**Legitimate business reason**

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.

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**Non token offer**

An offer of a gift, benefit or hospitality that is, or may be perceived to be (by the recipient, the person making the offer or by the wider community) of more than inconsequential value. All offers worth more than \$50 are non-token offers and must be recorded on the Gifts, benefits and hospitality register, whether accepted or declined.

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**Token offer**

An offer of a gift, benefit or hospitality that is offered as a courtesy or is of inconsequential or trivial value to both the person making the offer and the person receiving the offer. While the primary determinant of a token offer is that it would not be reasonably perceived as influencing an individual or raising an actual, potential or perceived conflict of interest, it cannot be worth more than \$50. If accepted, it does not require recording in the register.

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**Value**

The estimated or actual value of a gift in Australian dollars.

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## Attachment 2 – Examples of the GIFT test

The GIFT test provides a broad framework for determining the appropriateness of gifts, benefits and hospitality that may be offered to directors or employees. It is not feasible to produce a comprehensive list of all possible scenarios, nor is it desirable as the acceptance of gifts, benefits and hospitality requires the application of sound judgement.

The following examples are provided for further guidance and to assist directors and employees in their application of the policy.

- Tokens, mementos and small gifts of appreciation up to a nominal value of \$50 (E.g.: stationery, moderately priced bottles of wine or boxes of chocolates) as a token of appreciation for attendance at conferences, training, industry events, delivering presentations or speaking events on behalf of Ports Victoria may be accepted if the appreciation is being shown for a service provided, and declining the gift could offend or cause embarrassment
- Token gifts accepted by an employee for their work or contribution (such as door prizes at an event, speaker recognition gifts) may be accepted. Directors and employees must transfer all official gifts received on behalf of the organisation, any gift of cultural significance or gifts with a nominal value over \$50 to the Governance and Information Manager. Any fees for speaking must be declined
- Light refreshments and modest hospitality up to a nominal value of \$50 offered as a part of official business (such as business meetings, lunches or conferences) may be acceptable and are not reportable
- Hospitality with a value more than \$50, offered as a part of official business (such as business meetings, lunches or conferences) may be acceptable, however these hospitality events are reportable
- Offers of sponsored travel and accommodation and invitations to attend private functions should be declined due to the potential for perceived Conflicts of Interest. However, if the event or activity is considered to be in the public interest, then travel and accommodation costs may be paid by Ports Victoria. In all cases the appropriate Division Head must be advised and the offer recorded
- Invitations or requests involving suppliers, consultants, or contractors through personal or family relationships with Directors or employees are not allowed and would violate this policy. For example, if an employee is part of a tender process and a friend or family member invites them to an event hosted by one of the bidding companies, the director or employee must decline the invitation.
- When an offer of hospitality (or an event) is provided through a generic bulk invitation (ie: spam email offers, generic membership offers etc), no declaration is required if the offer is not accepted
- Accepted hospitality offered by a Victorian public sector organisation as part of official business does not need to be declared or reported.

## Attachment 3 – Examples of how to apply the HOST test

The following questions may be useful to assist with deciding on the type of gift, benefit or hospitality to provide:

- Will the cost of providing the gift, benefit or hospitality be proportionate to the potential benefits?
- Is an external venue necessary or does Ports Victoria have the facilities to host the event?
- Is the proposed catering or hospitality proportionate to the number of attendees?
- Does the size of the event and number of attendees align with intended outcomes?
- Will providing the gift, benefit or hospitality be viewed by the public as excessive?

The HOST test provides a broad framework in determining the appropriateness of gifts, benefits or hospitality that may be provided. It is not feasible to produce a comprehensive list of all possible scenarios, nor is it desirable as the provision of gifts, benefits and hospitality requires the application of sound judgement. The following examples are outlined for further guidance and to assist in the application of this policy.

The following examples are provided for further guidance and to assist directors and employees in their application of this policy.

- It is appropriate to host town hall style community events to raise awareness of critical port initiatives such as Keep Clear/Stay Clear or to consult on community projects
- It is appropriate to host industry events or forums that aid the delivery of Ports Victoria's business objectives and priority projects
- It may be appropriate to provide Ports Victoria branded materials and information packs to aid in the delivery of key messages
- Depending on the time, nature and duration of engagement activities, offering light refreshments could be deemed appropriate when engaging with external participants or attendees such as community representatives or other key stakeholders
- Recognising the contribution of employees when they exit the organisation via retirement and resignation is important. It is appropriate to host a morning or afternoon tea to recognise departing employees. It is appropriate to provide a farewell gift to those with five or more years of service. For further guidance please refer to People and culture
- It is appropriate to send flowers and a card to employees (or their families) who are grieving the loss of a close relative or who are absent from work recovering from serious injury or illness
- It is appropriate and a longstanding maritime and ports custom to exchange official gifts of appreciation with visiting dignitaries and to acknowledge the maiden voyage of significant vessels and ships
- It is appropriate to maintain a commitment to employee health and wellbeing through the modest provision of wellness programs arranged in accordance with this policy
- It is appropriate to recognise significant achievements and service milestones of employees for every five years of continuous service. For further guidance please refer to People and culture
- It may be appropriate to provide modest catering to celebrate the retirement of a long serving employee, a significant project completion, a training course, workshop, board meeting, planning day or conference
- A whole of business Christmas lunch is an appropriate way to celebrate the year's achievements and reward employees for their efforts. Where an appropriate Ports Victoria venue or public facility such as a town hall cannot be sourced for the event, a modestly priced reception centre or restaurant with accompanying services will be chosen. Ports Victoria will only fund one employee Christmas event each year