

# Gifts and Invitations Policy

## Scope

For the purposes of this Gifts and Invitations Policy, “**Transdev**”, “**us**”, “**our**”, “**we**” means Transdev Australasia Pty Ltd of Level 6, 550 Bourke Street, Melbourne Victoria 3000, and our related entities (including but not limited to the Transdev Australasian Group Entities).

This policy applies to all employees of Transdev Australasia Pty Ltd and its related parties within Australia and New Zealand. Related parties include all entities in which Transdev Australasia has, directly or indirectly, more than a 50% ownership, which includes:

- Transdev Australasia Pty Ltd
- Transdev Sydney Pty Ltd
- Transdev Queensland Pty Ltd
- Transdev WA Pty Ltd
- Transdev Sydney Ferries Pty Ltd
- Great River City Light Rail Pty Ltd
- Transdev Wellington Limited
- Howick & Eastern Buses Limited
- Mana Coach Services Limited
- Transdev John Holland Buses (NSW) Pty Ltd

This policy is supplementary to, and must be read together with, the Transdev Group Anti-Corruption, Money Laundering and Financial Terrorism Code of Conduct.

In the course of our dealings, there may arise situations where offers of gifts, invitations or other benefits are made to Transdev Personnel. This policy describes our standards and practices in connection with managing such situations. For the purposes of this policy:

- “**Gifts**” any payment, gratuity, gratification, present or advantage (pecuniary or not), offered or received, such as presents, goods, personal discounts, cash, gift vouchers, stocks, shares, and free services. They include (but are not limited to) gifts offered in the course of employment:
  - as a **greeting** at the start of a commercial relationship;
  - in **celebration** such as after a successful project;
  - **ceremonially** such as commonly done as part of the culture and practices of communities and governments, both within Australia and internationally; or
  - in **appreciation** for contribution;
- “**Invitations**” may include:
  - **hospitality** such as accommodation, meals and transportation; and
  - **entertainment** such as events including cultural or sports activities, to which you, a client or a partner is invited.

This policy applies to all “**Transdev Personnel**”, a term used in this policy to identify those people covered by the policy, including (but not limited to):

- all employees, including executive officers;

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- workplace participants, including apprentices, trainees, university and work experience students; and
- contracted third parties.

An immediate family member residing with Transdev Personnel may be treated as Transdev Personnel for the purposes of this policy on a case-by-case basis. Accordingly, Gifts or Invitations offered to an immediate family member of Transdev Personnel should be considered as though it were offered directly to Transdev Personnel, as such offerings may be judged to create a perception of conflict of interest on the part of the Transdev Personnel.

This policy does not apply where an offer is made to Transdev Personnel in their personal and private capacity which is unrelated to business relations.

This policy also does not apply to **symbolic** offers of Gifts or Invitations, including a gift, benefit or hospitality that is of inconsequential or trivial value (such as the purchase of tea/coffee or simple stationary item) to both the person making the offer and the recipient (such as basic courtesy). To be considered symbolic, offerings cannot be worth more than \$30 (or \$80 in the case of a meal).

## Purpose

The purpose of this policy is to outline Transdev's position for managing situations where offers of Gifts or Invitations are made to Transdev Personnel and is designed to support Transdev Personnel:

- in their responsibility to only accept an offer of Gifts or Invitations where it is permitted and does not create the perception of a conflict of interest or could raise a perception of, or actual, bias or preferential treatment; and
- to develop and maintain processes and appropriate documentation to ensure that full and proper consideration is given to the management and reporting of all offers of Gifts and Invitations.

## Compliance

This policy does not contain all associated documentation necessary for procedural compliance, and it is mandatory for all staff to familiarise themselves with relevant information provided in Promapp.

## Policy

### Principles

Transdev's default position in relation to offers or acceptance of Gifts or Invitations is to refrain from offering or otherwise keep them at a minimum and politely decline offers, unless:

- the offer is restricted to business relations;
- there is a strong public interest business reason to accept;
- the business reason can be clearly demonstrated and articulated; and
- the acceptance otherwise fully complies with this policy and law.

Transdev strictly prohibits acceptance of any Gift or Invitation which could give rise to a conflict of interest or be perceived as such. This includes Gifts or Invitations offered or given in the context of a tender or other procurement process which is strictly prohibited.

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Gifts or Invitations valued over the **threshold amount** (\$30 or \$80 in the case of a meal) must be registered (see 'Register of Gifts and Invitations' below). Any repeated Gifts or Invitations (regardless of symbolic and/or modest nature) from the same person or organisation must be rejected, as these may generate perceptions of conflicts of interests.

Gifts or Invitations that are **expensive** in nature (valued over \$200 require pre-approval from Line Manager and Transdev's Ethics & Compliance Officer and must be registered (see 'Register of Gifts and Invitations' below)).

### Invitations

In the case of Invitations, whether Transdev Personnel is offering or receiving an Invitation, the following principles must be applied:

- ensure prior authorisation (and appropriate approval of expenses) by line management, providing clear elements for compliant accounting of expenses e.g. name of concerned people, clear objective, activity description;
- ensure the Invitation is necessary for a working meeting or a commercial event, noting that leisure/entertainment events may be included if marginal and ethically acceptable (determined on a case-by-case basis); and
- travel and other related costs must be reasonable and consistent with the Transdev travel policy,

and where Transdev Personnel offer an Invitation:

- Transdev must pay directly to the supplier (e.g. hotel, airline) and not provide the invitee with moneys directly; and
- all costs that are not strictly related to the Invitation (e.g. personal expenses, travel extension or extra services) will remain the invitee's expense,

and where Transdev Personnel receive the Invitation:

- travel and accommodation conditions must be consistent with Transdev policies;
- travel and accommodation expenses should be paid by Transdev directly to the suppliers (e.g. hotel, airline) or if not possible, by the inviter; and
- all costs that are not strictly related to the Invitation (e.g. personal expenses, travel extension or extra services) will remain the Transdev Personnel's expense.

### Register of Gifts and Invitations

All offers of Gifts or Invitations that are valued over the threshold amount are considered non-symbolic offers and must be registered immediately, irrespective of the offer being accepted or declined. The register is maintained by the TDA Ethics & Compliance department and relevant details of the offer should be emailed to [tda.ethics@transdev.com.au](mailto:tda.ethics@transdev.com.au) (see guidelines on page 4).

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## Guidelines

If you receive an offer (or wish to make an offer) of a Gift or Invitation, consider the following guidelines:

<i>Is the offer covered by this policy?</i>	Is the offer business related and is therefore within the scope of this policy?	e.g. A greeting gift at the start of a commercial relationship
	Is the offer symbolic and therefore outside of the scope of this policy?	e.g. A sandwich offered at a meeting
<i>Should the offer be accepted/made?</i>	Is there a strong public interest business reason to accept?	
	Is the offer made publicly or privately?	
	How would the public view acceptance of the Gift or Invitation?	
	Can the business reason be clearly demonstrated and articulated?	
	Is the offer being made to further the conduct of official business?	
	Will the offer promote and support Transdev policy objectives and priorities?	
	Will the offer contribute to staff wellbeing and workplace satisfaction?	
	Would acceptance otherwise comply with this policy and law?	e.g. Is it in compliance with local regulation such as anti-bribery laws
	Could acceptance create the perception of (or create actual) a conflict of interest, bias or preferential treatment?	
<i>Should the offer and/or acceptance be registered?</i>	Does the timing of the offer coincide with a business decision to be made, such as relating to the outcome of a tender process?	
	Is the offer over the threshold amount?	

Some examples of Gifts or Invitations and their acceptability include:

**ACCEPTABLE**

- Branded promotional gifts (e.g. pens, mugs, t-shirts)
- A Gift valued within the threshold amount which is offered outside of any commercial negotiations or procurement processes (e.g. local product of souvenir)
- Invitation to public event for the purposes of marketing and networking

**NOT ACCEPTABLE**

- Cash (loans, credits, transfers)
- Expensive jewellery
- Excessive, lavish or repeated gifts
- Any gift during a tender process or contract negotiation
- Personal discounts, commissions or other forms of remuneration
- Gambling activities

When in doubt, it is best to take Transdev’s default position and politely decline the offering. Transdev’s Ethics & Compliance department may be contacted for further guidance by emailing ethics

**Breach of this policy**

Transdev Personnel’s failure to identify, declare and manage offers of Gifts and/or Invitations in accordance with this policy may result in disciplinary action.

**Changes to this policy**

Please note that we may make changes to this policy from time to time in accordance with changing business practices and laws. Please refer to Promapp/ISPQ for the most recent version of this policy.



Nathan Lanthois  
Chief Legal & Commercial Officer – Transdev Australasia

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Category	Gift	Meal	Hotel	Other	Validation
Symbolic	Less than \$30	Less than \$80	-	Less than \$30	None
Reasonable	From \$30 to \$200	From \$80 to \$200	Less than \$200	From \$30 to \$80	<b>Declaration</b> to Line Manager and Country Ethics and Compliance Officer and to TDA Gifts and Invitations Register
Expensive	Above \$200	Above \$200	Above \$200	Above \$80	<b>Pre-approval</b> from Line Manager and Country Ethics and Compliance Officer and declaration in TDA Gifts and Invitations Register