GIFTS AND BENEFITS POLICY

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A	Risk Management (Governance and Compliance)	15/2/2023	Anton Pickett, (Operations Manager, Civil & Construction)	Justin Kickett (Executive Director)	Angela Kickett (Executive Director)
1	Review	4/7/2024	Anton Pickett, (Operations Manager, Civil & Construction)	Justin Kickett (Executive Director)	Angela Kickett (Executive Director)

1 PURPOSE

i24s Group Pty Ltd ("i24s") ("the Group") (ABN 74 650 861 402), is a 100 per cent owned and operated Aboriginal business. The Group is a leading provider of talent pipeline/workforce solutions, industrial equipment hire and goods, and outreach and advocacy services, for the Mining, Resources, Energy, Infrastructure and Property sectors.

At i24s, 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, our employees may not solicit, give or receive, either directly or indirectly, gifts and benefits in relation to an individual or Group 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.

The Group's 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 i24's favour is a bribe.

The governance of this **Gifts and Benefits Policy** ("Policy") is overseen by the Group's Officer, Angela Kickett.

2 GIFTS AND BENEFITS DEFINITION

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

<u>Gifts</u> – Any type of gift, whether pecuniary or not and including personal gifts.

<u>Benefits</u> – 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 I24S.

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

3 SCOPE

This Policy applies to employees, sub-contractors and other parties undertaking work for the Group.

When the following terms are referenced herein, "we", "our" or "us", we are referring to everyone at i24s. The scope of this Policy applies to all workplaces which are under the Group's control.

4 ASSESSING ACCEPTABILITY

When assessing what is and is not acceptable, i24S employees should consider the guidelines below.

Unacceptable

- Anything that is illegal or breaks the law.
- Any cash or cash equivalents, such as gift vouchers, shares, or other items redeemable for cash, regardless of the amount involved.
- Anything that is extravagant or does not correspond in size or extent to the occasion.
- Anything that could affect or appear to affect the recipient's business judgment.
- Anything that is not aligned to the Group's ethical business practices (e.g. sexual favours, and events at sexually oriented clubs).
- Anything offered to someone who is about to make a business decision for the Group, for example the award of a contract.
- Anything that would damage our reputation if publicly reported, either locally or internationally.
- Anything that contravenes the recipient's internal rules and standards, including government officials who are subject to stringent regulation.
- Any gift or benefit that has to be kept secret from other colleagues, an employee's Manager or any other relevant stakeholders.

Needs Consideration and Approval

- Travel expenses of third parties involving flights and overnight stays.
- The inclusion of partners at entertainment or hospitality events.
- Invitations to particularly expensive cultural or sporting events, such as World Cups, Olympics, etc.
- Gifts on special occasions, such as births and weddings, etc.

Acceptable

- Modest, occasional gifts and/or meals with a business associate/partner that fall within the Group's financial limits
- Small corporate, promotional gifts – for example, branded merchandise such as pens, umbrellas, etc. Occasional attendance to ordinary sporting or cultural events, such as theatre performances or concerts.

5 OTHER CONSIDERATIONS

Apart from monetary value, those included in scope 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.

6 REGISTRATION AND APPROVAL PROCESS

All gifts and benefits exceeding $100 (standard business practice in Australia) must be approved by the employee's supervisor. Please note:

- Supervisors 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 i24s offers a gift or benefit, such as lunch, the most senior i24S 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 Group's Gifts and Benefits Register is available for all employees to contribute via i24s's intranet.

7 REPORTING CONCERNS AND VIOLATIONS

The Group'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 supervisor; and/or
- contacting or speaking to any of the Co-Founders/Officers and Executive Directors.

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

8 GOVERNANCE

The governance of this Policy is overseen by the Group's Officer, Angela Kickett. For further information about this Policy, please contact i24s on +61 8 9209 2090 or admin@i24s.com.au

Angela Kickett

Angela Kickett

Co-Founder/Executive Director