GIFTS, BENEFITS AND HOSPITALITY (GBH) PROCEDURE

1. Purpose

The Nature Parks acknowledges that gifts, benefits and hospitality will be directly or indirectly offered to, or provided by, employees and Board Members from time to time. Offers of gifts, benefits and hospitality must never be solicited, and Nature Parks encourages a culture of “thanks is enough”, where offers are discouraged and not accepted, even if they are permitted.

When offers are received the Nature Parks is committed to ensuring that conflicts of interest are avoided, high levels of integrity and public trust are maintained, and that behaviours are consistent with Nature Parks Code of Conduct, and the *Code of Conduct for Victorian Public Sector Employees*. Minimum standards have been established, which the Nature Parks employees and Board Members must adhere to when undertaking activities for, or on behalf of, the Nature Parks.

GBH offers must never be accepted unless there is clear justification, consistent with the prohibitions in this procedure, to do so.

2. Scope

Applies to:	Board Members Chief Executive Officer	Employees	Students Interns Volunteers	Contractors	Visitors
	✓	✓	✓*	✓*	

* Nature Parks employees responsible for coordinating and supervising volunteers or contractors, or engaging with suppliers, are expected to ensure the application of the *Code of Conduct for Victorian public sector employees* as part of this engagement. Contractors and consultants are only bound by the code if explicitly required by their contract for services. Suppliers are made aware of these requirements during the application and approval process.

3. Definitions

Term	Definition
Gifts, reportable, non-token	Free or discounted items or services, gifts of cultural or historic significance, gifts offered by a visiting delegation, hospitality, or any item that would generally be seen by the public as a gift, valued at more than $50.00. These include items of high value (e.g. artwork, jewellery, or expensive pens), and may be perceived by the recipient, the person making the offer, or the wider community, to be of more than inconsequential value. All offers worth more than $50.00 must be recorded on the gift register, regardless of whether or not the offer is accepted or refused.

Term	Definition
Gifts of appreciation, or token gifts	Gifts valued at less than $50.00 inc. GST RRP that are generally given to express thanks or as a courtesy or is of inconsequential or trivial value to both the person making the offer and the individual. This includes small bunch of flowers, consumables (e.g. fruit, chocolates), wines, pens, ties, scarfs and mementos and the like, each of which has a value of less than $50.00 inc. GST RRP. Where one source offers multiple token gifts to the Board or employees and the cumulative total exceeds $50.00 inc GST RRP in a 12-month period, the gift must be treated as a reportable gift and recorded in the gifts register.
Benefit	Anything of value offered directly or indirectly to a Board Member or employee. The value of benefits may be difficult to define in dollars, but as they are valued by the individual, they may be used to influence the individual's behaviour. A benefit could include preferential treatment, hospitality or privileged access to events (e.g. tennis or football matches, dinners, memberships or discounts) or other advantage offered to an individual.
Hospitality	A benefit such as dining, drinks or entertainment including social, tourism and industry events, over $50.00 inc GST RRP in value, hosted by someone who is either likely to, or has potential to, be a business associate. Hospitality is the friendly reception and entertainment of guests; it may range from light refreshments at a business meeting to expensive restaurant meals and sponsored travel and accommodation.
Business associate	An external individual or entity which the Nature Parks has, or plans to establish, some form of business relationship, or who may seek commercial or other advantage by offering gifts, benefits or hospitality.
Conflict of interest	***Actual*** - there is a real conflict between an employee's public duties and private interests. ***Potential*** - an employee has private interests that could conflict with their public duties; this refers to circumstances where it is foreseeable that a conflict may arise in future and steps should be taken now to mitigate that future risk. ***Perceived -*** the public or a third party could form the view that an employee's private interests could improperly influence their decisions or actions, now or in the future. (refer *Conflict of Interest Procedure* for further detail)
Direct or indirect	A gift or benefit may be made directly to a Board member or employee or made indirectly via an offer to a relative or close associate. This includes: • immediate family (e.g. spouse, partner, parent, sibling, child); • a regular member of their household, whether they are related or not; or • another close associate (e.g. friend, business associate, or other relative).
Gift register (internal and public register)	The list of gifts, hospitality and benefits received over $50.00 inc GST RRP in value, unless relating to a tourism or conservation industry networking event or related presentation. It records the date an offer was made and by whom, the nature of the offer, its estimated value, the raising of any actual, potential or perceived conflicts of interest or reputational risks and how the offer was managed. For accepted offers, it details the business reason for acceptance and the officer approving the acceptance. Access to the register is restricted, with a de-identified copy of the register is published on the Nature Park internet twice a year.
Legitimate business benefit	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.
Fundraising	Fundraising by public sector organisations that is consistent with relevant legislation and any government policy is not prohibited under the minimum accountabilities, provided it is undertaken in accordance with Nature Parks procedures. Nature Parks funding is not to be used to carry out or contribute to fundraising activities undertaken by employees in a private capacity.
Public Interest	Directors and employees are to act in the public interest, in compliance with this policy
Official gift or official item	Something with cultural, ceremonial, religious, historic, or other significance, accepted or given on behalf of Nature Parks as part of business with an official delegation/delegate or representatives of a community group or organisation, or government.

Term	Definition
Ceremonial gifts	Ceremonial gifts are official gifts provided as part of the culture and practices of communities and government, within Australia or internationally. Ceremonial gifts are usually provided when conducting business with official delegates or representatives from another organisation, community or foreign government. Ceremonial gifts are the property of the Nature Parks, irrespective of value, and should be accepted by individuals on behalf of the Nature Parks. The receipt of ceremonial gifts should be recorded on the register but does not need to be published online.

4. Minimum Accountabilities

4.1 Under the Instruction 3.4.11 Managing gifts, benefits and hospitality, Instructions supporting the Standing Directions of the Minister for Finance 2016, the Victorian Public Sector Commission has set binding minimum accountabilities for the appropriate management of gifts, benefits and hospitality. These minimum accountabilities apply to all Nature Parks employees and Directors and are applied within this Procedure.

5. Procedure

Accepting or refusing offers of gifts, benefits and hospitality

5.1 To determine whether to accept or refuse any offer of gifts, benefits or hospitality, Nature Parks employees and the Board Members are to consider the *GIFT* test (refer Appendix 1: Accepting or refusing offers of Gifts, Benefits or Hospitality).

Reporting offers of gifts, benefits and hospitality

5.2 Nature Parks employees and Board Members must report all offers of non-token gifts, benefits or hospitality regardless of the offer being accepted or declined (refer Appendix 2: Reporting Gifts, Benefits or Hospitality offered, declined or accepted).

Providing gifts, benefits and hospitality

5.3 To determine whether to provide gifts, benefits or hospitality to people external to Nature Parks such as business partners, Nature Parks employees and the Board Members are to consider the *HOST* test (refer Appendix 3 : Providing Gifts, Benefits or Hospitality)

5.4 Where Nature Parks plans to provide gifts, benefits or hospitality to employees, students, interns or volunteers as recognition, reward, award or benefits, this is to be undertaken in accordance with the Rewards and Recognition Procedure.

Gifts, benefits and hospitality program structure and management

5.5 Nature Parks must establish, implement and regularly review processes around responding to offers of gifts, benefits and hospitality, including multiple offers from the same source.

5.6 A register for gifts, benefits and hospitality valued at more than $50.00 offered to employees and Board Members of the Nature Parks must be maintained that, at a minimum, records sufficient information to effectively monitor, assess and report on these minimum accountabilities.

5.7 Records relating to gifts, benefits or hospitality are subject to regular scrutiny, including, at a minimum, annual review by the Nature Parks Audit, Risk and Finance Subcommittee; reporting must include analysis of the Nature Parks gifts, benefits and hospitality risks (including repeat offers from the same source and offers from business associates), risk mitigation measures and any proposed improvements.

5.8 The Nature Parks gifts, benefits and hospitality expectations must be regularly communicated to ensure high levels of awareness, throughout all members of the organisation - from front line employees to Managers to Board Members and the Chief Executive Officer. Communications must make it clear that:

- they must not accept gifts, benefits or hospitality that could raise a reasonable perception of, or any actual, bias, or preferential treatment;
- they are accountable for:
  - declaring all non-token offers, or disclosing all token offers, of gifts, benefits and hospitality;
  - seeking approval before accepting non-token offers of gifts, benefits and hospitality;
  - the responsible provision of gifts, benefits and hospitality;
- those with direct reports are accountable for demonstrating good practice and promoting awareness of gifts, benefits, and hospitality expectations; they must ensure they are aware of, and monitor, the risks inherent in their teams work and functions relating to gifts, benefits and hospitality; and
- a breach of the gifts, benefits and hospitality procedure or processes may constitute a breach of the Code of Conduct and may constitute criminal or corrupt conduct that could result in disciplinary action or referral of the matter to police.

5.9 The Nature Parks must regularly communicate to its business associates its position on the offering of gifts, benefits and hospitality to employees, including possible consequences for a business associate acting contrary to the Nature Parks position.

5.10 The Nature Parks must publish its gifts, benefits and hospitality procedure and gift register, on its public website; the published register must have identifying information deleted (to comply with privacy obligations), must be published at least annually, and must cover the current and previous financial year.

6. Related documents

Legislation/Regulations	• *Privacy and Data Protection Act* 2014 • Victorian Public Sector - Gifts, Benefits and Hospitality Policy framework (Jun 2019) • Code of Conduct for Victorian public sector employees • *Public Administration Act 2004* (Vic)
Policies	• Board Charter • Code of Conduct • Financial Management and Accounting Policy

Procedures	• Conflict of Interest • Delegation of Authority • Purchasing and Procurement Procedure • Reward and Recognition • Grants, Donations and Sponsorships Procedure
Forms	• Gifts, Benefits and Hospitality Disclosure Form • Gift Register

7. Review and Approval

Document reviewed by:

- Executive Team
- Management Team
- Audit Risk and Finance Subcommittee

Document Approved by:

- Board
  Meeting: 24 June 2025
  Resolution Number: 121-2025-B

Appendix 1

Accepting or refusing offers of Gifts, Benefits or Hospitality

When deciding whether to **accept** an offer, first consider if the offer could be perceived as influencing you in the performance of your duties or lead to reputational damage. The more valuable the offer, the more likely that a conflict of interest or reputational risk exists.

If you have been offered a gift, benefit or hospitality, the following test is useful when considering how to respond:

G iver	**Who is offering the gift, benefit or hospitality and what is their relationship to me?** Does my role require me to select contractors, award grants, regulate industries or determine government policies? Could the person or organisation benefit from a decision I make?
I nfluence	**Are they seeking to gain an advantage or influence my decisions or actions?** Has the gift, benefit or hospitality been offered to me publicly or privately? Is it a courtesy or a token of appreciation or valuable non-token offer? Does its timing coincide with a decision I am about to make or my endorsement of a product or service?
F avour	**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 the last 12 months? Would accepting it create an obligation to return a favour?
T rust	**Would accepting the gift, benefit or hospitality diminish public trust?** How would the public view acceptance of this gift, benefit or hospitality? What would my colleagues, family, friends or associates think?

- The **minimum accountabilities** for all Nature Parks employees and Board Members for accepting gifts, benefits and hospitality are as follows:
  a) Do not solicit gifts, benefits or hospitality for themselves or for others.
  b) Refuse all offers of gifts, benefits or hospitality that:
     - are money, items used in a similar way to money, or items easily converted to money;
     - give rise to an actual, potential or perceived conflict of interest, including from people or organisations with whom a Board Member or employee is likely to make or influence decisions involving tender processes, procurement or revenue contracts, enforcement or regulation, licensing, grants, sponsorship, or from current or prospective suppliers or contractors;
     - could compromise the public's trust that you will perform your job in an impartial manner, or the public's trust in the impartiality of Nature Parks;
     - are not consistent with community expectations;
     - are made in secret;
     - extend to their relatives or friends;
     - where, in relation to hospitality and events, Nature Parks will already be sufficiently represented to meet its business needs; or
     - are non-token offers without a legitimate business reason.
  c) Refuse bribes and report bribery attempts to the Chief Executive Officer or the Board Chair. The Chief Executive Officer or Board Chair must notify the Independent Broad-based Anti-corruption Commission (IBAC) of any matter which they believe on reasonable grounds may be corrupt conduct or, if appropriate, notify Victoria Police of a suspected offence.
  d) Return any non-token gift offered where it is likely to bring yourself or Nature Parks into disrepute or represents a conflict of interest.
  e) Refuse repeat or multiple token or non-token offers from the same person or organisation, as this can generate a stronger perception that you could be influenced and could reasonably be seen as adding up to a conflict of interest or may lead to reputational damage.

f) Refuse the offer if accepting could reasonably be seen as advantaging a supplier or sponsor in future procurement or could be seen as endorsing a product or service.
g) Be particularly cautious about accepting offers of hospitality (e.g. food, drink, travel, accommodation, events or activities), as these are often inconsistent with community expectations, and there is also a high risk of conflict of interest. Examples of prohibited hospitality offers that must be refused (subject to (h) below) include:
    - attend as a guest in a corporate box at the football or at a car or horse racing event;
    - attend a concert or theatre event;
    - attend an industry golf day or play golf at a reduced fee;
    - be 'shouted' a meal at a restaurant; or
    - accept complimentary or discounted tickets for a family member to attend the tennis.

    Accepting a prohibited gift offer may constitute misuse of a Board Member's or an employee's position, a breach of this procedure and/or a breach of the Code of Conduct and may result in disciplinary action. In addition, if the gift was offered with the expectation of something in return, such as preferential treatment, accepting it may constitute a bribe or other form of corruption and lead to criminal prosecution
h) Where there is a legitimate business reason to accept any of the types of offers highlighted in (g) above, written endorsement must be provided by the Chief Executive Officer (for staff) and by the Chair (for Chief Executive Officer and Board) prior to acceptance of this gift. This endorsement must be attached to the gift form.
i) Non-token offers of gifts, benefits or hospitality offered by Victorian public sector organisations as part of official business can be accepted, where it meets the minimum accountabilities, and where the reason for attendance is consistent with Nature Parks functions, objectives and the individual's role.
j) Refuse offers of gifts, benefits or hospitality from people or organisations you are likely to make or influence a decision about in the foreseeable future, as this could reasonable be seen as a conflict of interest.
k) Offers that can be considered for acceptance include:
    - token gift offers that do not raise a conflict of interest (anything valued at $50 or above is not a token offer)
    - token hospitality (a basic courtesy)
    - gifts offered as part of the culture and ceremonial practice of communities, such as from an overseas delegation
    - thank-you gifts such as a small gift to a speaker at a conference or seminar
    - offers made or sponsored by a state government department or Minister
    - tickets to conferences and seminars relevant to the business of the department or where the conference organiser offers to fund travel or accommodation costs for an employee to present a paper at the conference
    - when there are legitimate business reasons, or it will further the business of the Nature Parks, or there is a public benefit in accepting the offer. Examples of legitimate business activities at Nature Parks can include:
        - marketing activities, including the promotion of Nature Parks business at domestic or international trade shows, and familiarisation tours
        - reciprocal arrangements between the Nature Parks and its partners for entry to/ rights to use each other's attractions/ properties, provided there is no conflict of interest.
        - free entry to other tourism attractions and similar organisation as part of the reciprocal arrangement in the tourism industry
    - internal offers that promote approved programs related to the health and well-being or rewards and recognition of employees
    - invitations to official business events

- A Board Member or employee who is offered a gift of token value that is not a prohibited gift, and which meets the minimum accountabilities, may:
    - refuse the gift offer; or
    - accept the gift offer and retain the gift as their own; and
    - must disclose the offer as soon as possible (refer Appendix 2: Reporting Gifts, Benefits or Hospitality offered, declined or accepted).

- Non-token gifts given to you specifically in recognition of your work or contribution, may be retained provided ALL the following requirements are met:
    - it is not an official gift or official item
    - it would be consistent with community expectations
    - it is unlikely to bring you or our organisation into disrepute, and
    - your manager or, depending on the gift, an appropriately senior delegate gives written approval.
- If unsure about how to respond to an offer of a gift, benefit or hospitality of **more than $50.00**, seek advice from the Chief Financial Officer, Chief Executive Officer or the Business Support Manager.

- All employees and Board Members must ensure that all offers of gifts or hospitality **valued under $50.00** are only be accepted if they comply with the minimum accountabilities of the gifts, benefits and hospitality procedure. If there is uncertainty as to whether a gift or hospitality can be accepted, then the offer must be declined, or the Chief Financial Officer or the Chief Executive Officer must be consulted prior to accepting the offer.

- It is normal to receive offers of gifts, benefits and hospitality in your personal life that are unconnected to your work. You can accept these offers, provided you believe on reasonable grounds that the offers are made in a personal capacity. If you are unsure whether an offer is being made to you in a personal capacity or because of your role with our organisation, apply the integrity test, consider the GIFT questions and follow this procedure as you would in your professional capacity.

Official gifts and official items

Accepting an official gift or official item on behalf of Nature Parks is an exception to the ‘thanks is enough’ approach.

The official gift or official item must be declared regardless of monetary value (refer Appendix 2: Reporting Gifts, Benefits or Hospitality offered, declined or accepted) and remains the property of Nature Parks, who will determine what to do with each official gift or official item, or non-token gift, that comes into its possession according to the nature of the item.

If an official gift or official item was given to you specifically in recognition of your work or contribution, you may retain it provided that it meets ALL the following requirements:

- it is the express wish of the giver
- it benefits Nature Parks relationship with the giver
- it is appropriate given the significance and value of the item
- it would be consistent with community expectations
- it is unlikely to bring you or our organisation into disrepute, and
- your manager or, depending on the gift, an appropriately senior delegate gives written approval.

Offers to our organisation

- Where offers are made to our organisation itself, before deciding whether to accept such an offer, take into account whether the offer meets the minimum accountabilities, and carefully scrutinise:
    - the people or organisation making the offer;
    - the nature and circumstances of the offer;
    - the level of public benefit if the offer is accepted.

Reject any offer that is not consistent with the minimum accountabilities, and record all offers in the gifts, benefits and hospitality register (refer Appendix 2: Reporting Gifts, Benefits or Hospitality offered, declined or accepted).

- Where an offer is made to provide our organisation with a benefit like discounts, free tickets or equipment for employees, or non-token offer to attend a learning opportunity, Nature Parks may decide to accept the offer and provide it to employees for reward and recognition purposes after taking into account the above factors, and any other relevant requirements of this procedure.

  Reject any offer that is not consistent with the minimum accountabilities, and record all offers in the gifts, benefits and hospitality register (refer Appendix 2: Reporting Gifts, Benefits or Hospitality offered, declined or accepted).

- Sometimes an individual or business that has a relationship with our organisation may seek to donate or gift to a third party, like a charity, in our name or on our behalf (often without seeking prior approval from Nature Parks or giving us any opportunity to accept or refuse the gift or donation). There are reputational risks associated with any donation or gift made on our behalf, even where this is well meaning. Other risks associated with allowing a commercial partner to donate or gift in this manner including the impact that this may have on future procurement or work activities. While there may be no opportunity to refuse the donation or gift once made, the commercial partner should be informed that no gift or donation should be made on our organisation's behalf in future without a formal offer and approval.

  Where a gift or donation has been made it should be listed on the gifts, benefits and hospitality register (refer Appendix 2: Reporting Gifts, Benefits or Hospitality offered, declined or accepted).

Generic offers

Generic offers or SPAM emails may appear personalised by being addressed to you directly, or through the use of generative language tools that can quickly and believably personalise the body of emails whilst still sending them to a large number of people. If you receive an email and you are unsure if it is a generic offer, talk to your manager to determine if you need to declare it. Some useful questions to ask when unsure are:

- Do I have a relationship with the person who sent the email?
- Do I have a relationship with the organisation who sent the email?
- Is the offer related to my work or the work of my area of the organisation?

If the answer to all of the above is 'no' then it is likely a generic offer.

To determine if generic offers of non-token gifts or benefits can be accepted, consider the minimum accountabilities. Generic offers do not need to be declared unless the offer is accepted (refer Appendix 2: Reporting Gifts, Benefits or Hospitality offered, declined or accepted).

PLEASE ENSURE YOU UNDERTAKE THE REQUIRED REPORTING
IN RELATION TO ANY TOKEN OR NON TOKEN GIFT, BENEFIT OR HOSPITALITY OFFERED
REGARDLESS OF WHETHER IT WAS ACCEPTED OR REFUSED

Appendix 2

Declaring and reporting Gifts, Benefits or Hospitality offered, declined or accepted

All **offers you receive** for non-token gifts, benefits or hospitality valued at **over $50.00 must** be declared and registered and approved in accordance with the below process:

- Complete the Gifts, Benefits and Hospitality Disclosure Form and send to the Chief Executive Officer or the Business Support Manager:
  - prior to accepting the offer; or
  - within five working days of the offer being received and accepted, if it was reasonable to be unaware that the gift was non-token (ie: a wrapped gift) or it would have caused serious offence to refuse (unless it was an official gift).
- The Chief Executive Officer will determine the outcome of the offer, taking into consideration the minimum accountabilities, regarding whether it can be accepted or declined, or must be returned.
- The offer and outcome will be registered on the Gift Register:
  - the Gift Register is maintained by the Business Support Manager, updated based on the information provided in the Gift, Benefits and Hospitality Disclosure Form, and stored in a secure location to prevent unauthorised changes; and
  - the business reason for accepting non-token offers must be recorded in the register with sufficient detail to link the acceptance to the individuals' duties and work functions and benefit to the Nature Parks.

Regardless of whether a token gift (valued at less than $50.00) is accepted or refused, it must be disclosed as soon as practicable to the Chief Executive Officer, via email, setting out:

- The date of the offer;
- The source (organisation or individual) of the offer;
- What was offered and why;
- That acceptance of the offer does not create a conflict of interest, nor lead to reputational damage;
- That it was a token offer, including an estimate of the gift offered, and an indication of the combined value of gifts from the source in the past 12 months;
- Whether it was a prohibited gift; and
- Whether the offer was accepted or refused.

Non-token gifts, benefits or hospitality offered by Victorian public sector organisations as part of official business must be declared and reported, regardless of whether it was accepted or refused.

Official gifts or official items must be declared regardless of monetary value, and recorded in the register, including details of Nature Parks decision regarding how the official gift or item (or non-token gift) is to be handled. Official gifts or official items are not usually published as part of the online public register.

Offers made by organisations to provide Nature Parks with benefits must be recorded in the register, as a multi-employee declaration. In this instance, the individual employees do not need to make declaration if accepting the offer made via Nature Parks, but do need to declare any actual, potential or perceived conflicts of interests arising from the offer.

A gift or donation made by an individual or business that has a relationship with Nature Parks should be listed on the gifts, benefits and hospitality register; if the donation was not approved by Nature Parks, register should include there was no opportunity to accept or refuse.

Generic offers (for example, received via SPAM) do not need to be disclosed unless the offer is accepted.

Appendix 3

Providing Gifts, Benefits or Hospitality

If you are deciding whether to **provide** a gift, benefit or hospitality, the following test is useful when considering what type of gift, benefit or hospitality to offer:

H ospitality	**To whom is the gift, benefit or hospitality being provided?** Will recipients be external business partners, or employees of Nature Parks, or a mixture of both?
O bjective	**For what purpose will hospitality be provided?** Is the hospitality being provided to further the conduct of official business? Will it promote and support Nature Parks' policy objectives and priorities? Will it contribute to staff wellbeing and workplace satisfaction?
S pend	**Will public funds be spent?** What type of hospitality will be provided? Will it be modest or expensive, and will alcohol be provided as a courtesy or an indulgence? Will the costs incurred be proportionate to the benefits obtained?
T rust	**Will public trust be enhanced or diminished?** Could you publicly explain the rationale for providing the gift, benefit or hospitality? Is there a conflict of interest? Will the event be conducted in a manner which upholds the reputation of Nature Parks? Have records in relation to the gift or hospitality been kept?

The **minimum accountabilities** for all Nature Parks employees and Board Members **providing** gifts, benefits and hospitality to **people external to the Nature Parks**:

a) Ensure that any gift, benefit or hospitality is provided for a business purpose, in that it furthers the conduct of official business or other legitimate organisational goals, or promotes and supports Nature Parks' policy, objectives, and priorities. Examples of legitimate business activities at Nature Parks can include:
   - marketing activities, including the promotion of Nature Parks business at domestic or international trade shows, and familiarisation tours
   - reciprocal arrangements between the Nature Parks and its partners for entry to/ rights to use each other's attractions/ properties, provided there is no conflict of interest.
   - free entry to other tourism attractions and similar organisation as part of the reciprocal industry arrangement in the tourism industry

b) Ensure that any costs are proportionate to the benefits obtained for the Nature Parks and would be considered reasonable in terms of community expectations. Factors include:
   - will the cost of providing the gift, benefit or hospitality be proportionate to the potential benefit?
   - is an external venue necessary or does Nature Parks have 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?
   - is the gift symbolic, rather than financial, in value?
   - will providing the gift, benefit or hospitality be viewed by the public as excessive?

c) Ensure that it does not raise an actual, potential or perceived conflict of interest.

d) Ensure that when hospitality is provided, individuals demonstrate professionalism in their conduct and uphold their obligations to extend a duty of care to other participants.

e) Ensure that the reporting and record keeping requirements of gifts, benefits or hospitality **provided** are consistent with Appendix 2 : Reporting Gifts, Benefits or Hospitality offered, declined or accepted.

Criteria relating to the provision of gifts, benefits and hospitality to Nature Parks employees, students or volunteers can be found in the Rewards and Recognition Procedure.

In all instances, those providing gifts, benefits or hospitality on behalf of Nature Parks must ensure that all purchasing is done in accordance with the Purchasing and Procurement Procedure.

If providing donations of free of charge tickets for charitable purposes, this must be undertaken in accordance with the Grants, Sponsorships and Donations Procedure.

If providing a ceremonial gift to an official representative of an Aboriginal or Torres Strait Islander Group, make reasonable enquiries it will be appropriate to do so, and in accordance with the Reconciliation Action Plan.