

Policy

(Board Approved)



Corporate Entertainment and Hospitality

Document Number – GOV-POL-08

1.0 Policy Statement

There is a high standard of accountability applied to expenditure incurred by Stanwell Corporation Limited (Stanwell) when providing corporate entertainment and hospitality.

Our people must ensure that:

- there are clearly identifiable commercial and organisational benefits for Stanwell from any corporate hospitality and entertainment expenditure; and
- all corporate entertainment and hospitality expenditure is appropriate, reasonable and in line with Stanwell's Values and reasonable community standards and able to withstand public scrutiny.

It is acknowledged that as part of doing business, Stanwell may determine that it is appropriate to offer hospitality from time to time to corporate customers, key stakeholders and interest groups.

2.0 Scope

This policy applies to Stanwell's directors and employees, and to all contractors working for or at Stanwell (our people).

3.0 Purpose

The purpose of this policy is to establish a common understanding of Stanwell's expectations regarding the provision of corporate entertainment and hospitality.

4.0 Content

Definition of corporate entertainment and hospitality

Corporate entertainment and hospitality is to be for official purposes only and must have a beneficial connection with Stanwell's business goals as outlined within Stanwell's annual Statement of Corporate Intent.

Benefits include strengthening business relationships and links and supporting or enhancing Stanwell's corporate image and business reputation with key stakeholders, such as the communities in which our assets are located.

It is expected that corporate hospitality would **not** be a substitute for business meetings.

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ENDORSED/CHECKED BY: ELT

APPROVED BY: Board

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Corporate entertainment and hospitality **can** include meal and non-meal related events which may occur on Stanwell's premises or at other venues. Such events would typically include but are not necessarily limited to:

External events

- entertainment and hospitality expenditure where the sole purpose is to host external stakeholders or business visitors (local, interstate or overseas); and
- community stakeholder events.

Internal events

- entertainment and hospitality expenditure for our people, provided that the purpose of the expenditure is to contribute to Stanwell's overall business goals.

The above items are included as a guide only and are **not** intended to be a comprehensive list.

Exclusions

For the purposes of this policy, corporate entertainment and hospitality does **not** include:

- expenditure on meals which are incidental to business meetings, workshops / conferences / seminars, regardless of whether they are attended by employees or external stakeholders;
- team building exercises;
- specific reward and recognition events; and
- expenditure on meals incurred as part of travelling on Stanwell business (please refer to Stanwell's Travel Policy for further details).

Participants

For external events, the mix of Stanwell representatives to official guests should be guided by the need to optimise the business goals of Stanwell. The list of Stanwell representatives should be limited to those with a direct involvement in the business interest being advanced by the event. It is anticipated that invited guests would comprise a majority of the total attendees.

For internal events, Stanwell expects that all attendees would be comprised of our people.

External and Internal events would **not** normally include family members. Prior written approval must be obtained from the relevant Executive General Manager, if family members are being invited to an event at Stanwell's cost.

Acceptable costs

The nature and cost of any event is to be reasonable by community standards and able to withstand public scrutiny.

A limit of \$125 per person (excluding GST) inclusive of meals, drinks and other entertainment applies to external events and functions, with the expectation that the \$125 limit would be the exception rather than the rule. On occasions where the limit is insufficient, an explanation of the need for the higher cost must be included with the request for approval of the event.

A limit of \$75 per person (excluding GST) applies to internal events. Internally focused events will be of a simple standard and it is expected that the \$75 limit will be the exception rather than the rule.

For staff related expenditure, guidelines for the level of expenditure to be incurred will largely depend on the duration, complexity and extent of staff involvement across the corporation as well as the frequency of similar types of events.

In circumstances where the cost of an event or function will exceed the limits set out above, our people can contribute personal funds so that that the total cost per person remains within the prescribed limits. Aggregate event expenditure should not exceed the per person threshold multiplied by the number of attendees.

Receiving hospitality

When receiving hospitality, care should be taken to avoid any possible conflict of interest. Transparency, accountability and integrity are to be maintained and it is particularly important that the situation should not be perceived or construed as providing any incentive for any commercial transactions.

Please refer to Stanwell's Gifts and Benefits Policy for further details.

Reporting

The annual budgeted expenditure for corporate entertainment and hospitality is documented within Stanwell's annual Statement of Corporate Intent. Details include total expenditure and individual commitments of more than \$5,000 (excluding GST). This budget is overseen by the General Manager – Strategy and Engagement, endorsed annually by the Board and approved by shareholding Ministers as part of the Statement of Corporate Intent process.

The Corporate Entertainment and Hospitality Guidelines for Government Owned Corporations directs Stanwell to provide details of any significant changes to its corporate entertainment and hospitality commitments, as specified in the Statement of Corporate Intent, and details of actual expenditure incurred within quarterly reports to shareholding Ministers. Furthermore, each quarterly report shall include reporting on individual events which cost more than \$5,000 (excluding GST) and the business purpose of those events.

Approvals and payment process

Delegation approval limits for corporate entertainment and hospitality are shown below:

Function type	Expenditure ^{1,2}	Delegation
External events	Equal to or less than \$5,000 (inclusive) and equal to or less than \$125 per person	Relevant Executive General Manager
External events	Over \$5,000 (inclusive) or over \$125 per person	Chief Executive Officer
Internal events	Equal to or less than \$500 (inclusive) and equal to or less than \$75 per person	Relevant General Manager (or relevant financial delegate)
Internal events	Over \$500 (inclusive) and equal to or less than \$75 per person	Relevant Executive General Manager
Internal events	Over \$75 per person	Chief Executive Officer

¹ Expenditure includes all functions costs, including venue hire, catering and entertainment.

² All values quoted are excluding GST.

The delegated approving officer must be able to identify the benefit of the expenditure for Stanwell.

All approvals must be obtained before an event or function is booked.

The most senior person at an event is required to pay for the event and is responsible for ensuring the cost is kept within appropriate limits.

Supporting documentation

The minimum documentation required in support of the provision of corporate entertainment and hospitality expenditure is:

- a description of the event including the clearly identifiable commercial and organisational benefits for Stanwell and its correlation with the goals of Stanwell's Statement of Corporate Intent;
- the names, organisation and relationship status of attendees. In the case of 'open invitation' events, a profile of the expected attendees is acceptable; and
- a tax invoice for expenditure within the per person limits.

5.0 Responsibilities and Authorities

The Board is responsible for approving this policy.

The Chief Financial Officer is responsible for administering and updating the policy.

Our people are responsible for ensuring that the policy requirements are complied with.

6.0 Review and Consultation

This document shall be reviewed every two years as a minimum.

7.0 Communication Plan

Stanwell will provide guidance to senior managers and decision makers to assist them in making the necessary judgements to ensure all discretionary expenditure is in accordance with this policy.

At a minimum, this policy and any subsequent updates are communicated via GenNet. Additional communication may be coordinated by the policy owner.

8.0 Definitions

GST	Goods and Services Tax
Stanwell	Stanwell Corporation Limited

9.0 References

Corporate Entertainment and Hospitality Guidelines for Government Owned Corporations (version 1.0) released September 2008

Business Required Travel Policy (GOV-POL-31)

Code of Conduct – they way we work at Stanwell (GOV-POL-30)

Conflict of Interest Policy (GOV-POL-26)

Gifts and Benefits Policy (GOV-POL-13)

10.0 Revision History

Rev. No.	Rev. Date	Revision Description	Author	Endorse/Check	Approved By
THIS DOCUMENT REPLACES ALL PREVIOUS SITE SPECIFIC POLICIES WITH THE SAME TITLE					
0	28.03.2014	Policy now incorporates all sites	Karen Buckley	ELT	Board - BD-14-03b-9.1
1	27.08.2015	- Section 4.0 (Content) - under "Internal Events" - removal of reference to Christmas parties. - Section 9.0 (References) - addition of "Event Function or Away Day Form T-2800".	Karen Buckley	Michael O'Rourke	Board - BD-15-08-9.1
2	20.07.2016	- Section 9.0 (References) – deletion of "Event Function or Away Day Form T-2800". (administrative change only)	Karen Buckley	Michael O'Rourke	Michael O'Rourke
3	29.08.2017	- Biennial review including administrative wording changes only	Darren Wiltshire	Michael O'Rourke	Board – BD-17-08-9.1
4	29.08.2019	Biennial review undertaken. Administrative changes made to position title only.	Karen Buckley / Darren Wilshire	Michael O'Rourke	Board BD-19-08-9.1