

# Brambles

## Gifts and Hospitality Policy

**Brambles Limited**

Revised: 1 July 2023

## GIFTS AND HOSPITALITY POLICY

Brambles' actions and relationship must reflect our ongoing commitment to maintaining the highest standards of business and ethics and compliance as set out in our Code of Conduct.

We know that hospitality can play an important part in building and maintaining relationships with our customers and other third parties. Similarly, there are times when it may be appropriate to offer or accept a modest gift. However, it is always important to remember that accepting or receiving gifts and hospitality can be abused, resulting in unnecessary risk to our business. This Gifts and Hospitality Policy is intended to help us avoid these risks, which include bribery, corruption, influence peddling and kickbacks and reinforces our commitment to doing the right thing each and every day.

### 1. Scope

This Gifts and Hospitality Policy applies to Brambles and its Group Companies (collectively, **Brambles**) and all officers, directors and employees (Collectively, **employees**). Employees should not only familiarise and observe this Policy but any local law or local policy established by their local business unit. To the extent that there is any inconsistency or conflict between this Gifts and Hospitality Policy and any local law or policy, the more stringent obligations shall apply.

**2. Definitions.** The terms below shall have the following meaning for purposes of this Policy:

- a. **Gifts** are items of value accepted from or offered to a Third Party by Brambles or one of its employees. Gifts can include but are not limited to merchandise, such as gift baskets, wine, clothing, mugs, pens, collectibles and hospitality bags, and tickets to in person or virtual sporting, musical or cultural events where you and the entity (whether Brambles or a Third Party) providing the tickets does not attend the event together.
- b. **Government Official** has the meaning set out in Brambles' Anti-bribery Policy and includes, but is by no means limited to, any state-owned entity.
- c. **Hospitality** generally refers to meals and entertainment and includes:
  - Appetisers, entrees, drinks, desserts, other food and beverages or meals; and
  - Tickets to in person or virtual sporting, musical or cultural events where you and the entity (whether Brambles or a Third Party) providing the tickets attend together.
- d. **Third Party** means any non-Brambles employee, including customers, prospective customers, suppliers, prospective suppliers, service providers, prospective service providers and any person with whom Brambles does or may do business.

### 3. Reference Guide

As long as all other requirements set out in this Gifts and Hospitality are met, the following reference guide sets out the approvals required:

Type of Third Party Offering or Receiving Gift or Hospitality	Gift or Hospitality or Both	Retail Value (US\$) of the Gift or Hospitality	Frequency	Approvals Required
Government Official or Family Member of Government Official	Both	Any amount	Anytime, regardless of frequency	Only with the prior approval of the Brambles Ethics Group
Non-governmental third party	Hospitality	Reasonable, in light of the circumstances	One-off or infrequent	No approval required
Non-governmental third party	Gifts	Up to US\$75.00	One-off or infrequent (if multiple gifts in one year, the value of the gifts must be added together to determine reasonableness)	No approval required
Non-governmental third party	Gifts	Between US\$75.00 and US\$250.00	One-off or infrequent (if multiple gifts in one year, the value of the gifts must be added together to determine reasonableness)	Only with prior line manager approval
Non-governmental third party	Gifts	More than US\$250.00	One-off or infrequent (if multiple gifts in one year, the value of the gifts must be added together to determine reasonableness)	Only with prior line manager approval + Prior approval of the Brambles Ethics Group

### 4. Handling Hospitality and Gifts

#### a) Gifts

Subject to any local law or other restrictions set out in this Gifts and Hospitality Policy, gifts may be given to or received from a Third Party if they are infrequent, for the sole purpose of cultivating or enhancing a business relationship and do not exceed more than a combined value of US\$75.00 in any fiscal year. Before offering or accepting gifts, Brambles' employees must ensure that:

- There is a legitimate business interest in offering or accepting gift;
- The value of the gift is modest and does not exceed US\$75.00;
- It is not solicited or requested or offered as a bribe, payoff, kickback or improper gratuity;
- It is and remains infrequent in nature;
- We are not in the period immediately leading up to or during a tender process or contract negotiation;
- It does not create the appearance (or implied obligation) of preferential treatment; and
- It is permitted by the Third Party's policies.

In the event you wish to offer or accept any individual gift greater than US\$75.00, or multiple gifts in one year from the same Third Party totalling more than US\$75.00, you must obtain the written pre-approval of your line manager. In the event you wish to offer or accept any individual gift greater than US\$250.00, or multiple gifts in one year from the same Third Party totalling more than US\$250.00, you must obtain the written pre-approval of your line manager and the Brambles Ethics Group. In certain circumstances, the Brambles Ethics Group may require that you return one or more gifts if it determines that the gifts (in number or value) from the Third Party are excessive or create an actual, potential or perceived conflict of interest.

#### b) Calculating the Value of Gifts

To determine the value of a gift or hospitality, use the approximate retail value. For instance, the value of a concert or sporting event ticket would be the stated price on the ticket.

#### c) Hospitality

Similarly, subject to any local law or other restriction set forth in this Gifts and Hospitality Policy, employees may generally offer or accept hospitality as long as it is reasonable, proportionate to the business relationship and justifiable in accordance with Brambles' policies, including Brambles' Anti-bribery and Avoiding Conflicts of Interest Policies.

When offering or accepting hospitality, Brambles' employees must ensure that:

- There is a legitimate business interest in offering or accepting hospitality;
- The value of the hospitality is modest and does not exceed any applicable local monetary limits, as determined by local law and local policy;
- It is not solicited or requested or offered as a bribe, payoff, kickback or improper gratuity;
- It is and remains infrequent in nature;
- We are not in the period immediately leading up to or during a tender process or contract negotiation;
- It does not create the appearance (or implied obligation) of preferential treatment;

**EMPLOYEES HAVE TO HANDLE GIFTS AND ENTERTAINMENT CAREFULLY, CONSIDERING BRIBERY AND CORRUPTION RISKS AS WELL AS POTENTIAL CONFLICTS OF INTEREST**

With this in mind, employees must not:

- Discuss, offer or receive any gifts or hospitality involving any Government Official or their family members without first obtaining written pre-approval from the Brambles Ethics Group;
- Offer or accept any gifts or hospitality, or any other local favours which are intended or might be seen to influence business decisions or create an obligation to do something in return;
- Offer or accept any gifts or hospitality in the period immediately leading up to or during a tender process or contract negotiations;
- Offer or accept any gifts that are in cash or a cash equivalent, such as lottery tickets, gift certificates, vouchers, loans, guarantees or any other granting of credit, shares or options; or
- Offer or accept any gift or hospitality which is inconsistent with Brambles' Global Dignity at Work Policy or which may bring Brambles' reputation into disrepute (e.g. any sexually illicit, indecent or "adult" entertainment) or cause offense under local norms or customs

- Is tasteful, consistent with our other policies and occurs at a business-appropriate venue;
- Is reasonable and appropriate in the context of the business occasion and the parties' respective positions; and
- It is permitted by the Third Party's policies.

If a Third Party representative does not attend the meal or entertainment with the Brambles employee, the meal or entertainment is considered a gift and is covered by the gifts guidelines.

### **5. Offering Gifts and Hospitality to Government Officials**

Before offering or accepting gifts or hospitality to or from any Third Party, it is important to know if they are a Government Official, as that term is defined in Brambles' Anti-bribery Policy, or a family member of a Government Official. Government Officials are generally subject to additional restrictions and prohibitions. Before offering or accepting any gifts or hospitality (regardless of value) to or from any Government Official or a member of their family, you must consult with and obtain approval from the Brambles Ethics Group.

### **6. Accurate Recording**

Employees must keep their own records of gifts and hospitality for inspection and ensure that any expenditure associated with any gifts and hospitality provided by, on behalf of, or for the benefit of Brambles is approved using Brambles' expense processing and clearance system.

### **7. Gifts to Other Brambles' Employees**

Employees may give personal gifts to their colleagues if the gifts are in good taste, reasonable, appropriate and do not appear to create the appearance of a conflict of interest. Personal gifts must be paid for by the employee and not expensed to Brambles.

Personal gifts (to include gift cards) to employees should not be offered as performance awards. Performance awards should be provided to employees under Brambles' approved programs using the local expense processing and clearance system.

### **8. Compliance with this Policy**

All employees must take the time to read and understand this Gifts and Hospitality Policy. Failure to comply with this Policy may result in disciplinary action, up to and including termination of employment.

### **9. Responsibility for the Success of This Policy**

The Brambles' Board of Directors has overall responsibility for this Gifts and Hospitality Policy. The Chief Compliance Officer has day-to-day operational responsibility for this Policy and should ensure that all employees receive regular and appropriate training.

The Chief Compliance Officer, in conjunction with the Brambles Board of Directors, will review this policy from a legal and operational perspective regularly. This Policy does not form a party of any employee's contract, or otherwise create one, and it may be amended from time to time. Employees are invited to comment on this Policy and suggest ways in which it might be improved. Comments or suggestions should be addressed to the Chief Compliance Officer.

### **10. Reporting Concerns or Wrongdoing under Brambles' Speak Up Policy**

Transparency is part of Brambles' culture; an open and honest workplace helps us to look out for one another and protect us from getting into difficult situations. If you have any questions about this Gifts and Hospitality Policy, or if you would like to report a potential violation of it, please speak to your line manager, your local Human Resources Representative, any member of the Legal, the Global Ethics and Compliance or Internal Audit Teams, or any other person authorised to receive complaints as set out in Brambles' Speak Up Policy. You also may report suspected violations of this Policy through the Brambles Speak Up Hotline by visiting the website at [www.brambles.ethicspoint.com](http://www.brambles.ethicspoint.com) or by calling the appropriate telephone number for your location, which can be found on the Speak Up posters located throughout your workplace.

Consistent with Brambles' Speak Up Policy, no reprisal or retribution will be taken against any employee for raising concerns under this Gifts and Hospitality Policy. Brambles is committed to investigating, addressing, and responding to the concerns of employees and to taking appropriate corrective action in response to any violation.