



Policy Name:	Gift & Invitation Registry
Attention:	LSH Group Australia Employees
Version:	2.6
Last Reviewed:	1 st April 2026
Effective From:	1 st April 2026
Approved By:	GCEO / Corp Review / MD

LSH Auto Australia Gift & Invitation Registry Policy

1. Purpose

This policy establishes clear standards for the giving and receiving of gifts, benefits, and invitations to:

- Maintain integrity, transparency, and ethical business practices.
- Prevent conflicts of interest, bribery, or undue influence.
- Ensure compliance with applicable laws, including the *Fair Work Act 2009*, *Corporations Act 2001*, and *Criminal Code Act 1995* (bribery and corruption provisions).
- Meet taxation obligations under Australian Taxation Office (including Fringe Benefits Tax (FBT)).

2. Scope

This policy applies to all employees (full-time, part-time, casual), contractors, and representatives of LSH Auto Australia across all business units.

3. Policy Principles

Employees must:

- Act with honesty, integrity, and impartiality.
- Avoid actual, potential, or perceived conflicts of interest.
- Not accept or offer gifts or benefits that could improperly influence business decisions.
- Ensure all gifts and benefits are lawful, reasonable, and proportionate.

Zero tolerance applies to bribery, corruption, or secret commissions.

4. Gifts & Benefits Provided by the Company

4.1 General Requirements

- Must be reasonable, infrequent, and for a legitimate business purpose.
- Must comply with FBT requirements as defined by the Australian Taxation Office.
- Must be approved in accordance with delegated authority limits.

4.2 Employee Recognition & Occasions

Permitted examples (within approved limits):

- Personal milestones (e.g. birth, bereavement, serious illness).
- Service recognition and milestone anniversaries.
- Retirement or long service acknowledgements.
- Completion of probation.

All gifts must remain modest in value and consistent with internal thresholds.



5. Gifts & Benefits from External Parties

5.1 Acceptable Gifts

Employees may accept gifts or hospitality only where:

- It is of token or nominal value.
- It is infrequent and not conditional.
- It does not influence, or appear to influence, decision-making.
- It complies with this policy and is properly declared.

5.2 Prohibited

Employees must not:

- Accept cash or cash-equivalent gifts (e.g. vouchers, gift cards of significant value).
- Accept gifts during procurement, tender, or negotiation processes.
- Accept repeated or excessive hospitality from the same party.
- Accept gifts delivered to personal addresses.
- Accept benefits for family members or associates.

Any inappropriate gift must be declined, returned, or donated.

6. Conflicts of Interest

All employees must comply with company conflict of interest requirements.
Where a gift or invitation may create a real or perceived conflict, it must be:

- Declared immediately
- Reviewed and approved (or declined)

7. Competitions & Prizes

- Participation in external competitions linked to business partners requires prior written approval.
- Any prize obtained in connection with employment is considered company property unless otherwise approved.
- Failure to obtain approval may result in disciplinary action.

8. Register & Disclosure Requirements

All gifts, benefits, invitations, and prizes (regardless of value) must be:

- Declared within 5 business days.
- Recorded in the Gift & Invitation Register.
- Approved by the relevant Manager and Dealer Principal.

Records must include:

- Nature and value of the benefit.
- Provider details.
- Business purpose.
- Frequency

Registers will be subject to periodic audit and review.

9. Compliance & Monitoring

The Company will:



- Conduct regular audits of registers and approvals.
- Ensure compliance with taxation (FBT) and financial reporting obligations.
- Investigate suspected breaches.

10. Breaches

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment.

Serious breaches may also expose individuals to:

- Civil or criminal liability under Australian law.
- Penalties under anti-bribery and corruption legislation.

11. Responsibilities

Employees

- Comply with this policy.
- Declare all gifts and benefits.
- Seek approval where required.

Managers

- Review and approve disclosures.
- Ensure consistent application of this policy.

Finance / HR / Compliance

- Maintain registers.
- Monitor compliance and FBT obligations.
- Provide guidance and training.

12. Record Keeping & Privacy

All records will be handled in accordance with the Privacy Act 1988.

13. Policy Status

This Policy does not form part of any employee's contract of employment. It is a lawful and reasonable direction of the Company with which compliance is required. Any statement in this Policy about what the Company will or will not do does not create a legally binding obligation on the Company.

This Policy may be amended from time to time to reflect changes in legislation, regulatory requirements or organisational needs.



Appendix A: Gift & Invitation Allowance

Occasion	Maximum Amount Australia: AUD	Type (Including delivery cost if required)
Birth Of a Child	<ul style="list-style-type: none">• \$100 per person	Flowers, Fruit Basket or something similar
Long Term Illness/ Hospital Stay	<ul style="list-style-type: none">• \$100 per person	Flowers, Fruit Basket or something similar
Marriage/ Wedding	<ul style="list-style-type: none">• \$100 per person	Gift Only
Bereavement; Death of an employee or former employee	<ul style="list-style-type: none">• \$100 per person	Flowers, Charity donation or similar
Probation Acknowledgement	<ul style="list-style-type: none">• \$50 per person	Gift only (e.g. LSH Auto Pen)
Resignation / Retirement Of employee (>15 years) Value of gift should be dependent upon employee level and overall contribution to company)	<ul style="list-style-type: none">• 15 – 20 Years - \$150• 21 - 25 Years - \$200• 26 - 30 Years \$250• 31 – 35 Years \$300• 36 - 40 Years \$350• 40 Years + \$400	Gift Only
Recognition of Service	<ul style="list-style-type: none">• 10 Years - \$500• 15 Years - \$750• 20 Years - \$1,500• 25 Years - \$2,000• 30 Years - \$3,000• 35 Years - \$5,000• 40 Years - \$7,500• 45 Years - \$10,000• 50 Years - \$15,000	To be paid as a Bonus



Appendix B: Unable to Accept Gift

[EXAMPLE LETTER]

Date

<Name>,
<Company>,
<Address>,
<City,
State,Postcode>.

Dear <Name>,

Thank you for your very kind gift that I received on the xx/xx/xx. Unfortunately, I am unable to accept your gift. As a highly valued partner of our company I wish to set out the reasons below as to why we are unable to accept this gift.

Under our internal guidelines, benefits provided by (Business Partners) need to be deemed reasonable in nature and scope to avoid any potential situations in which private interests conflict with the interests of LSH Auto Australia and/or local subsidiaries.

All LSH Auto Australia employees are bound by our Integrity Code, which has been developed to ensure that we operate consistently no matter where in the world we are represented. It is seen as an important piece in ensuring that our reputation is protected throughout our business.

In this case I believe it is appropriate to return the gift trusting that you understand the decision. (OR, I have taken the liberty to donate your kind gift to the (xyz charity), who I am sure will greatly benefit from this donation.)

Once again, thank you for your kind thought and we look forward to continuing an ongoing successful relationship.

King regards,



Appendix C: Authorisation

Approvers	
Head of Business Unit (BU)	John Good
GCEO	KS Gan

If approver is unable to approve, please escalate the request to the next higher-level authority.

Entertainment / Per Person

Limits	Head of BU	GCEO
< AUD 95	A	
AUD 95-AUD190	A	A
> AUD190	A	A
Expenses incurred by Head of BU <i>below</i> AUD 190		A
Expenses incurred by Head of BU <i>above</i> AUD 190		A

All entertainment claims must have the following:

- person entertained identified by name and company and;
- supported by receipts.

Gifts / External Party - Per Person

Limits	Head of BU	GCEO
< AUD 190	A	A
AUD 190-AUD550	A	A
> AUD 550	A	A
Given by Head of BU <i>below</i> AUD 550		A
Given by Head of BU <i>above</i> AUD 550		A

Gifts to internal parties, Cash and Voucher are strictly not permitted. Exception is made if it is for special award/ recognition and such award/ recognition is already included in the HR policy before the 1st February 2025. The value of such gift must be in accordance with the policy.

All gifts expense claims must have the following:

- person receiving the gift identified by name and company and;
- supported by receipts.