



Gifts and Entertainment Policy

GIFTS AND ENTERTAINMENT POLICY

1. Scope

- 1.1. This Policy applies to:
- (a) the TA Group which includes Tennis Australia Limited, Padel Australia Limited, the Australian Tennis Foundation, any other subsidiary entity of TA, and any Member Association that opts-into this policy; and
 - (b) TA Group Representatives, which includes:
 - (i) all Board Members of the TA Group entities;
 - (ii) all employees (whether they are full-time, part-time, casual, temporary or permanent) employed by the TA Group; and
 - (iii) all persons who work at the direction of, or on behalf of, the TA Group (for example, third party agents, independent contractors and MA roles that include reporting lines to TA, including MA CEO roles).
- 1.2. This Policy applies to all TA Group Representatives when carrying out their duties in their capacity as employees, contractors, management or agents of the TA Group, whether in Australia or overseas.

2. Background

- 2.1. It is against the law in Australia to bribe (including offering or attempting to bribe):
- (a) an Australian Commonwealth official in order to influence the carrying out of their Commonwealth duties; and
 - (b) a foreign public official in order to influence that official to gain a personal or business advantage.
- 2.2. It is important to note that some countries also prohibit the bribery or attempted bribery of private sector individuals.
- 2.3. Under the Anti-Bribery and Corruption Laws, the TA Group can be held criminally liable for failing to prevent TA Group Representatives from bribing foreign public officials.
- 2.4. TA has adopted this Policy as a way of safeguarding that:
- (a) TA Group and TA Group Representatives do not improperly influence decision-making of government officials by offering gifts and entertainment which expose the TA Group or TA Group Representatives under anti-bribery regulations;
 - (b) TA Group and TA Group Representatives do not improperly influence decision-making of Australian government officials or other third parties by offering excessive or improper gifts or entertainment;
 - (c) TA Group resources are used appropriately;
 - (d) TA Group's business decision-making is sound and not swayed by offers of substantial personal gifts or entertainment to TA Group Representatives;
 - (e) Gift and Entertainment blackout periods apply to high value contracts (i.e. Board Contracts) to guard against decisions making being inappropriately swayed.

- 2.5. As the TA Group's focus is on sports and entertainment, the TA Group runs a variety of events. Many of these events, such as the Australian Open, are high profile, and receive considerable attention across Australia and around the world. Accordingly, it is appropriate at times to invite guests including Government Representatives to these events to showcase our work and capability in running events. Nonetheless, TA Tickets and Invitations must not be used to improperly influence decision-making of a government official or other third party. TA maintains records of TA Group Tickets and Invitations in its ticketing and VIP invite systems, so TA Group Tickets and Invitations do not need to be recorded separately in the Gifts and Entertainment Register maintained under this Policy.
- 2.6. In summary, the Anti-Corruption Framework (defined below) fosters cultural integrity and creates a control environment within which TA Group Representatives can undertake their duties, especially liaising with Government Officials, without breaching the Anti-Bribery and Corruption Laws.

3. TA Group's Anti-Bribery Stance

- 3.1. The TA Group has zero tolerance of any form of or attempt to commit bribery.
- 3.2. The TA Group anti-bribery and corruption framework covers multiple facets of our operations and includes:
 - (a) this Policy;
 - (b) the Due Diligence Guidelines;
 - (c) the TA Whistleblower Policy;
 - (d) the TA Third Party Code of Conduct;
 - (e) Procurement Policy;
 - (f) Modern Slavery reporting;
 - (g) contractual provisions preventing bribery and corruption; and
 - (h) education and training.(together, the **Anti-Corruption Framework**).
- 3.3. Our values of Excellence, Humility, Imagination and Collaboration require the highest professional conduct standards on the part of TA Group Representatives.
- 3.4. TA Group Representatives are prohibited from offering Gifts and Entertainment and any other benefits to Government Officials to improperly influence their decision-making (whether for personal gain or TA Group gain). To ensure you do not contravene the Anti-Bribery and Corruption Laws, you must follow the procedures outlined in this Policy. Any TA Group Representative that fails to do so or attempts to contravene this Policy can face disciplinary action or dismissal.
- 3.5. Facilitation payments may be a form of bribe made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. If you are requested to make a facilitation payment, you must immediately notify the TA Company Secretary. The TA Company Secretary will then seek advice from external counsel prior to approving or denying such a payment. This excludes scenarios where the

routine governmental action offers an existing legitimate pathway to expedite processing times (for example, paying additional amounts to expedite visa processing or other government applications). These payments are not considered facilitation payments for the purpose of this Policy.

4. Oversight by Management

- 4.1. In light of the TA Group's operational circumstances and nature of activities, oversight by and involvement of management is crucial. In particular, management of TA is responsible for cultivating a culture of high ethical standards and avoidance of corrupt and improper practices.
- 4.2. In administering the TA Group Anti-Corruption Framework:
 - (a) TA Legal and the TA Company Secretary will oversee the administration of the Anti-Corruption Framework including periodic reviews and amendments to update the framework; and
 - (b) TA management from all teams will:
 - (i) lead by example by championing a culture of high ethical standards and acting with integrity and emphasise the responsibilities of TA Group Representatives in achieving those standards;
 - (ii) ensure staff are aware of and comprehend the Anti-Corruption Framework; and
 - (iii) demonstrate a top-level dedication to preventing bribery, a culture of integrity and a zero-tolerance approach to corruption.
- 4.3. The overall administration of this Policy is the responsibility of the TA Company Secretary (the Responsible Officer). The duties of the Responsible Officer include:
 - (a) managing compliance with this Policy; and
 - (b) managing the Gifts and Entertainment Register.

5. Due Diligence

- 5.1. The TA Group has established Due Diligence Guidelines to govern when due diligence is required, including the due diligence around the appointment of Third Party agents.

6. Gifts and Entertainment Rules

- 6.1. The TA Group recognises that the exchange of modest Gifts and Entertainment is consistent with customary business practices. Accordingly, the TA Group has put the requirements in this section 6 in place with respect to Gifts and Entertainment. If you are in any doubt, please contact the TA Company Secretary and seek advice.
- 6.2. Given the nature of the business operations of TA Group, it is often appropriate for TA Group Tickets and Invitations to be gifted to Government Officials and other Third Parties. This is not prohibited by this Policy, as long as there is no intention to influence those Government Officials or Third Parties in breach of Anti-Corruption and Bribery Laws. TA Group keeps records of invitations and tickets issued through its ticketing and VIP invite system.

In connection with your role with Tennis:	What you must do
Before you accept a Gift or Entertainment valued at \$500 or less per person from a Third Party.	<ul style="list-style-type: none"> Consider if the Gift or Entertainment is prohibited due to a Blackout Period. If it is not, you should consider if accepting the Gift and Entertainment is consistent with TA Group's legitimate business interests. You will usually be able to keep the Gift or accept the Entertainment if it is. You are encouraged to discuss such situations with your Direct Manager. You are encouraged to notify the TA Company Secretary as soon as reasonably possible. The TA Company Secretary may record the Gift or Entertainment on the Gifts and Entertainment Register.
You are offered Entertainment valued at over \$500 per person from a Third Party.	<ul style="list-style-type: none"> Consider if the Entertainment is prohibited due to a Blackout Period. If no Blackout Period applies, you should consider if accepting the Entertainment is consistent with TA Group's legitimate business interests. You will usually be able to accept the Entertainment if it is. You are encouraged to discuss such situations with your Direct Manager. You must notify the TA Company Secretary who will record it on the Gifts and Entertainment Register.
You are offered a Gift valued at over \$500 per person from a Third Party.	<ul style="list-style-type: none"> Where possible, decline the Gift. If the circumstances require you to accept the Gift you must notify and provide the Gift to the TA Company Secretary. If you are a team member, the TA Executive team, in considering the Gift and circumstances, by a majority decision, will determine how the Gift is to be utilised. You may not get to keep the gift. If you are a Board member, the Board, in considering the Gift and circumstances, by a majority decision, will determine how the Gift is to be utilised. You may not get to keep the gift. The TA Company Secretary will record such arrangements on the Gifts and Entertainment Register.
You wish to offer Gifts or Entertainment valued at \$500 or less per person to a Third Party.	<ul style="list-style-type: none"> Consider if the Gift or Entertainment is prohibited due to a Blackout Period. If it is not, discuss it with your Direct Manager. You can offer the Gift or Entertainment if your Direct Manager agrees that it is consistent with TA Group's legitimate business interests and is not prohibited by this Policy.
You wish to offer Gifts or Entertainment valued at over \$500 per person to a Third Party	<ul style="list-style-type: none"> Consider if the Gift or Entertainment is prohibited due to a Blackout Period If it is not, discuss it with your Direct Manager. You can offer the Gift or Entertainment if your Direct Manager agrees that it is consistent with TA's legitimate business interests. Advise the TA Company Secretary as soon as reasonably possible. The TA Company Secretary will record it on the Gifts and Entertainment Register.
You wish to offer Gifts or Entertainment to a Government Official	<ul style="list-style-type: none"> You must not provide Gifts or Entertainment to a Government Official (or anyone associated with a Government Official) in an effort to influence governmental decision making. You are encouraged to co-ordinate any interactions with Government Officials with TA's Government Relations team.

Notes:

- TA Tickets and Invitations are not required to be recorded in the Gifts and Entertainment Register. Tickets and Invitations are recorded in TA's ticketing and VIP invite systems.

2. Where the value of the Gift and Entertainment is not known, a reasonable estimate should be made. If in doubt, you should disclose.

7. The Gifts and Entertainment Register

- 7.1. TA Group Representatives are encouraged to disclose all Gifts and Entertainment to the TA Company Secretary.
- 7.2. As indicated above:
 - (a) all Gifts or Entertainment given by TA Group Representatives valued over \$500; and
 - (b) all Gifts or Entertainment received by TA Group Representatives valued over \$500,must be notified to the TA Company Secretary so they may be listed on the Gifts and Entertainment Register.
- 7.3. Where the value is under \$500 or unknown, a determination as whether a disclosure is to be listed on the Gifts and Entertainment Register will be made by the TA Company Secretary in consideration of the circumstances regarding the Gift or Entertainment and the value of the Gift or Entertainment.
- 7.4. The Gifts and Entertainment Register will be provided by the TA Company Secretary to the TA Audit and Risk Committee for review on a regular basis.

8. Breaches and Reporting

- 8.1. Failure to comply with this Policy will be viewed seriously and may result in disciplinary action, including dismissal.
- 8.2. Suspected breaches (including attempted contraventions) of this policy by employees should be reported to the TA Company Secretary. Suspected breaches (including attempted contraventions) of this policy by TA Group Board members should be reported to the Chair of the TA Audit & Risk Committee and/or Chair of the Board. Genuine reports are encouraged and the reporting person will not be subject to adverse outcomes as a result of reporting suspected breaches where the person reasonably believes they have occurred.

9. Monitoring and Review

- 9.1. The TA Company Secretary will monitor compliance with this Policy and the Anti-Corruption Framework. This Policy will be periodically reviewed to ensure it continues to operate effectively for the TA Group 's business operations and will be amended as required.
- 9.2. Examples of events that may prompt a review and evaluation outside of the periodic review include:
 - (a) changes to TA Group's activities;
 - (b) entering new markets;
 - (c) a bribery incident;
 - (d) a corruption incident;

(e) changes in the governance or regulatory environment for TA Group; and

(f) employee or associate feedback from surveys or training.

9.3. The scope and frequency of the review process will depend on the assessment of risks and effectiveness of monitoring procedures.

9.4. All TA Group Representatives are responsible for the success of this Policy and should ensure they use it to disclose any suspected danger or wrongdoing. You are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the TA Company Secretary.

9.5. This Policy may be amended at any time.

10. Definitions

10.1. In this policy:

Anti-Bribery and Corruption Laws means any applicable laws enacted in force from time to time regarding bribery, corruption fraudulent acts or any other corrupt practices and includes (a) the Criminal Code Act 1995 (Cth); the Crimes Act 1914 (Cth); the Bribery Act 2010 (UK); the Foreign Corrupt Practices Act of 1977 (USA); and any other applicable and equivalent laws in any jurisdiction in which the Third Party and TA have operations.

Blackout Periods means a period of time where no Gifts or Entertainment with a specified party is permitted because TA Group is in a tender period or commercial negotiations with that party. If you are a TA Group board member for details of Blackout Periods please refer to the Board Reports. If you a TA Group employee, please refer to the internal website (ACE). By way of explanation, in order to avoid any perception of any inappropriate conduct you must not accept Gifts or Entertainment from the other party to a Board Contract around the re-negotiation or tender period. As a general rule, the blackout period will be six months around key contractual dates. If you have a role in the negotiations or an operational role in the delivery of the existing contract, you can have business meetings and other business communications with the other party during the Blackout Period. You may also organise or accept invitations to a celebratory dinner or event once the associated contract is signed.

Board Contracts means major contracts with partners or suppliers that are defined as “Board Contracts” in the Contracts Policy.

Direct Manager means:

- (a) in the case of the CEO, the Chair of the Board, or in his or her absence, the Chair of the Audit & Risk Committee;
- (b) in the case of a Board Member (other than the Chair of the Board), the Chair of the Board, or in his or her absence, the Chair of the Audit & Risk Committee;
- (c) in the case of the Chair of the Board, the Chair of in the case of an employee, their line manager, or in his or her absence, their more senior line manager.

Entertainment means activities that are not paid for, in full, by the recipient and not provided under the terms of an existing contract. Examples include:

- (a) activities, such as football tickets, concert tickets, 'behind the scenes' experiences, a weekend winery expedition, or a supplier's golf day;
- (b) travel and accommodation to events not organised by TA Group;
- (c) meals, such as an invitation to a bar or restaurant, which is not during a TA Group event; and
- (d) use of personal services, equipment or facilities, such as use of a supplier's gym, or company car. For clarity, ad hoc use of a partner or supplier's office facilities is acceptable and not captured by the scope of this policy.

For the avoidance of doubt, Entertainment does not include:

- (a) receiving ticketing and/or hospitality at tennis events not organised by TA Group, for example other Grand Slams when attending those events as part of your tennis role; or
- (b) travel and accommodation to speak at events, where the speaking engagement is approved by TA.

Gifts means anything of value that is not paid for, in full, by the recipient. Examples include:

- (a) free or discounted items and items that are generally perceived as gifts, such as artwork, jewellery, expensive pens, wine or suits;
- (b) merchandise or other gifts provided at events not organised by TA Group;
- (c) gift cards or promotional items, like gift hampers;
- (d) discounts, like offers of access to cost price goods, unless such discounts are widely available; and
- (e) contributions, like a donation to a charity or other organisation linked to the recipient.

For the avoidance of doubt, uniforms and clothing provided by TA Group or its partners or suppliers in connection with your role with tennis and gifts you receive from the TA Group are not considered to be a Gift under this policy.

Government Official means a public officer (including a candidate of a public officer position), employee or other person acting on behalf of any government (i.e. national, provincial, local). This includes persons acting on behalf of government departments and agencies, state-controlled companies, international quasi-governmental organisations and enterprises financed in large measure by public money (or widely perceived to be performing government functions) and any persons with potential to act in this capacity (i.e. candidates for office).

Policy means this Gifts and Entertainment Policy.

TA Group Tickets and Invitations means tickets/invitation and related benefits (which may include hospitality, travel, accommodation and merchandise) to events organised by the TA Group provided to others either:

- (a) free of charge for their personal use (i.e. not for resale); or
- (b) under a contract with the TA Group.

Third Party means a person who is not a TA Group Representative.

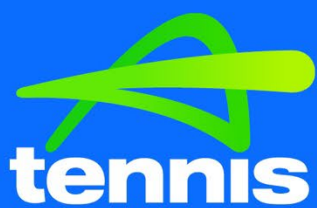
11. Application of this policy to Member Associations (MA)

If a Member Association opts in to this policy:

- (a) references to the **TA Company Secretary** and **Responsible Officer**, are to be read as references to the **MA Company Secretary**;
- (b) references to the **TA Group** or **TA**, are to be read as references to the **MA**;
- (c) references to **TA Group Representative** are to be read as references to a **MA Representative**;
- (d) references to **Audit & Risk Committee** are to be read as references to **MA Audit & Risk or similar committee**;
- (e) references to **TA Chair** are to be read as a reference to the **MA Chair or President (as the case may be)**;
- (f) references to **TA Audit & Risk Chair** are to be read as references to the **MA Audit & Risk Chair or Chair of a similar MA Committee**; and
- (g) this policy is to be read in such a way to make it relevant to the MA environment.

Version Control

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Tennis acknowledges the Traditional Custodians of the land on which we work, rest and play, and pay our respect to Elders past and present.