



Australian Government

**NAIF**

Northern Australia Infrastructure Facility

# Gifts and Benefits Policy

MARCH 2026

# Contents

<b>1. Scope of this Policy</b> .....	<b>3</b>
<b>2. Policy Statement</b> .....	<b>3</b>
<b>3. Threshold Value, Principles and Reporting</b> .....	<b>3</b>
<b>3.1. Threshold Value</b> .....	<b>3</b>
<b>3.2. Principles</b> .....	<b>3</b>
<b>3.3. Declaring</b> .....	<b>4</b>
<b>4. Reporting</b> .....	<b>4</b>
<b>5. Consequences of non-compliance</b> .....	<b>4</b>
<b>6. Responsibilities</b> .....	<b>5</b>
<b>7. Policy Review and Approval</b> .....	<b>5</b>

## Document Purpose

The Gifts and Benefits Policy provides a framework to outline the Northern Australia Infrastructure Facility’s (NAIF) requirements in relation to receiving and giving of gifts or benefits.

## 1. Scope of this Policy

This Policy applies to NAIF Board Members, employees, and contractors (for the purpose of this policy 'employees' includes each of these categories).

## 2. Policy Statement

NAIF does not encourage the giving or accepting of any gifts or benefits.

Employees, in the course of their work, may be offered gifts or benefits. NAIF as an organisation may accept gifts where refusal could cause cultural offence or where an item is ceremonial in nature or offered by way of public thanks.

Employees should carefully consider the appropriateness of a gift or benefit before giving or accepting.

## 3. Threshold Value, Principles and Reporting

### 3.1. Threshold Value

The Threshold Value for gifts and benefits is \$1 AUD (ex. GST).

### 3.2. Principles

NAIF understands and values the hard work and dedication of employees, and that from time to time they will be offered gifts or benefits from third parties (this could be in the form of, but not limited to, a bottle of wine, an invitation to a corporate dinner or an invitation to a sporting event).

The decision to accept a gift or benefit must be defensible and able to withstand public scrutiny:

- Employees should decline any gift or benefit of greater value than \$100 from a third party unless specifically approved by the Board Chair, Chief Executive Officer, or Chief Risk Officer (as per the procedure).
- Employees attending a conference or event as a delegate where NAIF has paid for a ticket which includes hospitality and entertainment, do not need to declare and record the event on the register.
- Employees invited to speak at a conference and where a complementary ticket is given, which includes hospitality and entertainment as part of the conference, do not need to declare and record the event on the register.
- Employees may accept complementary invitations to attend industry events or events that are directly relevant to NAIF's scope of work or projects. Any hospitality or entertainment provided as part of the event must be declared and recorded on the register.
- Gifts and benefits related to an event or invitation funded by a current or potential NAIF proponent must be declared.
- Employees are encouraged to discuss whether or not to accept a gift (under \$100) with their line manager or EMG member
- Family or friends of employees are not to accept any gifts or benefits arising from your role at NAIF. If you do become aware that this has occurred, you are required to report it to the Company Secretary immediately.

The following gifts/benefits that are prohibited unless pre-approval is sought:

- Asking for, or encouraging, the giving of gifts or benefits to yourself or others;
- Accepting a gift of money;
- Accepting a gift of alcohol;

- Accepting a gift or benefit from a proponent, potential proponent (or related party of a proponent), or any prospective supplier during a tender/procurement process; or
- Accepting a gift or benefit that influences or could be perceived to influence your decision or action on a particular matter.

In the limited circumstances where a gift/benefit may be accepted in good faith (for example, being provided with a gift of alcohol or other goods for being a guest speaker at a conference), employees are required to follow the Gifts and Benefits Procedure.

The purchasing of gifts or benefits on behalf of NAIF for an external third party is prohibited unless pre-approval is sought; this includes covering the meal of a non-NAIF employee.

### 3.3. Declaring

The Company Secretary is responsible for managing and maintaining the Gift and Benefit Register.

Employees are required to complete a monthly attestation confirming they have or have not received or declined to accept a gift during the month or within 31 days of giving or receiving a gift or benefit. If a gift or benefit has been received, it must be reported in the Risk and Compliance system at the time of the attestation.

The Gifts and Benefits Register of items valued at \$100 or more is published on the NAIF website on a quarterly basis.

## 4. Reporting

The Risk and Compliance system is the mandatory reporting tool for employees to report any incidents or near misses. This includes but is not limited to situations where gifts have been provided by NAIF without approval, undisclosed benefits, or instances of non-compliance with the policy. Employees are encouraged to refer to the incident guideline on NAIF Connect or contact the Risk and Compliance team for any queries or concerns related to reporting procedures.

Any deliberate non-compliance with the policy by an employee must be reported in the Risk and Compliance system. Additional methods of reporting suspicions of fraud and corruption by an employee or public official are available in the Fraud and Corruption Control Plan.

Consequences may include a breach of the Code of Conduct for deliberate non-compliance by employees.

## 5. Consequences of non-compliance

Deliberate breaches of this Policy may have serious consequences in accordance with the Code of Conduct, which could result in termination of employment or other engagement with NAIF.

## 6. Responsibilities

Roles	Responsibilities
<b>NAIF Board</b>	<ul style="list-style-type: none"> <li>Approving material policy and any proposed changes after a review and recommendation by the Policy Sponsor.</li> <li>Tasking management with policy implementation, exception reporting and for developing procedures to support the policy.</li> <li>Complying with the requirements of this policy.</li> </ul>
<b>Board Chair</b>	<ul style="list-style-type: none"> <li>Complying with the requirements of this policy.</li> <li>Approval of gifts over \$100 excl. GST</li> </ul>
<b>Chief Executive Officer</b>	<ul style="list-style-type: none"> <li>Approving immaterial policy and any proposed changes after a review and recommendation by the Policy Sponsor with materiality determined at the discretion of the CEO.</li> <li>Complying with the requirements of this policy</li> <li>Approval of gifts over \$100 excl. GST</li> </ul>
<b>Chief Risk Officer</b>	<ul style="list-style-type: none"> <li>Implementing this policy at NAIF.</li> <li>Reviewing the Policy each calendar year.</li> <li>Approval of gifts over \$100 excl. GST</li> <li>Complying with the requirements of this policy.</li> </ul>
<b>Company Secretary</b>	<ul style="list-style-type: none"> <li>Maintaining Gift and Benefit Register.</li> <li>Providing training to NAIF Board Members on this policy.</li> <li>Complying with the requirements of this policy.</li> </ul>
<b>Director, Risk and Compliance</b>	<ul style="list-style-type: none"> <li>Providing training to NAIF employees, and contractors on this policy.</li> <li>Complying with the requirements of this policy.</li> </ul>
<b>NAIF Employees</b>	<ul style="list-style-type: none"> <li>Complying with the requirements of this policy.</li> </ul>

## 7. Policy Review and Approval

The Chief Executive Officer reviews and approves the Policy every two years.

The Policy is reviewed annually (or more frequently if required) by the Policy Sponsor to ensure it remains aligned with legislation and good practice. If any material amendments occur to the Policy arising from the review cycle, it is provided to the NAIF Board for review and approval.

### Document Review and Approval

Policy Sponsor	Policy Approver	Approval Date	Next Board Review
<b>Chief Risk Officer</b>	Chief Executive Officer	March 2026	March 2028

## Related Documentation

**Gifts and Benefits Procedure**  
**Gifts and Benefits FAQ**  
**Conflicts of Interest Policy**  
**Conflicts of Interest Procedure**  
**Conflicts of Interest FAQ**  
**Code of Conduct**  
**Public Interest Disclosure Policy**  
**Fraud and Corruption Control Plan**



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