POLICY (Board Approved)

Sponsorships, Memberships, Advertising, Donations, Corporate Entertainment and Hospitality Policy

GOV-POL-08

WRITTEN BY: Manager Brand and Marketing	ENDORSED/CHECKED BY: Chief Executive Officer	APPROVED BY: Board

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1.0 Policy Statement

Stanwell Corporation Limited (Stanwell) recognises that, as part of doing business, it may be appropriate to undertake sponsorships, maintain memberships, conduct advertising activities, provide donations and offer corporate entertainment or hospitality.

A high standard of accountability applies to expenditure incurred by Stanwell. Our people must ensure that:

- expenditure is for official purposes only;
- there are clearly identifiable commercial, strategic or organisational benefits to Stanwell, the State and the communities in which Stanwell operates;
- expenditure is appropriate, reasonable, represents value for money and is able to withstand public scrutiny;
- expenditure is consistent with Stanwell's values and Government and community expectations; and
- actual, perceived and potential conflicts of interest are appropriately identified and managed.

2.0 Purpose/Scope

The purpose of this policy is to establish Stanwell's governance framework for expenditure on sponsorships, memberships, advertising, donations, corporate entertainment and hospitality, and to support appropriate decision-making and accountability.
Expenditure in these areas must be for official purposes, deliver value to Stanwell, and be appropriate, reasonable and able to withstand public scrutiny.
This policy applies to Stanwell's directors and employees, and to all contractors working for or at Stanwell (our people).

3.0 Content

3.1 General principles

Sponsorships, memberships, advertising, donations, corporate entertainment and hospitality must be for official purposes only and have a beneficial connection with Stanwell's business objectives.

Expenditure must be well justified and deliver genuine commercial, strategic or organisational benefits to Stanwell, the State and the communities in which Stanwell operates. It must be reasonable and proportionate, represent value for money and be appropriate for a publicly owned entity.

All expenditure must be appropriately authorised and may only be incurred and paid in accordance with the provisions and delegations outlined below.

3.2 Sponsorships

All sponsorships, grants and other direct funding must only be provided to groups, organisations and activities based in, or operating out of, the local and regional communities in which Stanwell operates. Sponsorships are key mechanisms through which Stanwell builds trust, strengthens relationships and supports its social licence.

Stanwell delivers discretionary financial sponsorships through two distinct funding streams:

- **Community Benefit**, which supports initiatives that deliver positive social outcomes and strengthen relationships with the communities in which Stanwell operates; and
- **Business Benefit**, which supports activities that help achieve Stanwell's corporate objectives.

Sponsorship activities support Stanwell's stakeholder engagement and community investment objectives and are undertaken in accordance with the Stakeholder Engagement Policy, Sponsorships and Donations Procedure (STM-PROC-21), and the provisions and delegations outlined in this Policy.

3.3 Memberships

Memberships support Stanwell's participation in industry, professional and business organisations. It can provide access to industry information, professional development opportunities, research, networking opportunities and representation within key industry forums.

Memberships should be aligned with Stanwell's business objectives and operational requirements and periodically reviewed to ensure they remain relevant and cost effective.

Where multiple membership options are available, Stanwell will select the lowest level membership appropriate to Stanwell's business needs.

3.4 Advertising

Advertising supports Stanwell's strategic objectives, operational activities, projects, stakeholder engagement objectives and regulatory obligations. Advertising can include promotional campaigns, stakeholder communication, project-related communication, employment campaigns and other activities intended to support Stanwell's business objectives.

Advertising expenditure must represent value for money and be appropriate to the audience and purpose of the activity.

3.5 Donations

Stanwell may make in-kind donations where there is a demonstrated community benefit, alignment with community expectations, and a clear rationale supporting the benefit to the communities in which Stanwell operates. In-kind donations associated with asset disposals must be managed in accordance with Stanwell's Sponsorships and Donations Procedure.

3.6 Employee Events

Employee activities must be arranged in accordance with the requirements and delegations outlined in Stanwell's Internal Employee Events Procedure (PEO-PROC-78). For Queensland Treasury reporting purposes, expenditure associated with employee events, including end-of-year functions, conferences and award ceremonies, will be captured under corporate entertainment and hospitality.

3.7 Corporate entertainment and hospitality

Corporate entertainment and hospitality must 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.

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:

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

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

3.7.1. 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;
- expenditure on meals incurred as part of travelling on Stanwell business (please refer to Stanwell's Business-required Travel Policy for further details).

3.7.2. Participants

The mix of Stanwell representatives to official guests should be guided by the need to optimise the business objectives 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. An appropriate balance must be

maintained between Stanwell representatives and invited guests, having regard to the purpose and intended outcomes of the event. It is expected that invited guests would comprise a majority of the total attendees.

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.

3.7.3. 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 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.

In circumstances where the cost of an event or function exceeds the prescribed limits, our people can contribute personal funds so 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.

3.8 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.

Stanwell's Board approved Gifts and Benefits Policy outlines the required procedures and controls.

3.9 Conflicts of interest

Persons involved in approving or participating in expenditure governed by this Policy must identify, declare and appropriately manage any actual, perceived or potential conflict of interest in line with Stanwell's Board approved Conflict of Interest Policy GOV-POL-26.

3.10 Other related activities

This includes expenditure not otherwise categorised in the above sections of this policy that relates to sponsorships, memberships, advertising, donations or corporate entertainment and hospitality.is includes expenditure not categorised in the above section of the policy as it relates to sponsorships, memberships, advertising, donations and corporate hospitality.

4.0 Reporting

Stanwell will report expenditure under this policy through the Statement of Corporate Intent, quarterly reporting to shareholding Ministers and the Annual Report, in accordance with the applicable templates and instructions set out in Queensland Treasury Sponsorships, Memberships, Advertising, Donations, Corporate Entertainment and Hospitality Guidelines – Government Owned Corporations, Queensland Rail and Seqwater (July 2026), as amended from time to time.

In general, Stanwell will provide details of expenditure on individual activities costing over $5,000 and aggregated expenditure by category for activities below $5,000, as well as total aggregated expenditure across all categories. Stanwell will keep shareholding Ministers informed of any significant proposed expenditure, including the anticipated benefit to Stanwell and the State, prior to entering into a binding contract. This will occur primarily through the Statement of Corporate Intent, quarterly reporting to shareholding Ministers or other appropriate reporting to shareholding Ministers.

5.0 Approvals and delegations

Approval of Stanwell expenditure under this Policy must only be exercised by officers who hold a delegation under the CEO Manual of Authorities. No expenditure may be committed unless the approving officer is authorised in accordance with Stanwell's Delegations of Authority.

5.1 Sponsorships, donations and grants

Below are the delegation approval limits for sponsorships, donations and grants. Stanwell's Sponsorships and Donations Procedure STM-PROC-21 outlines the relevant approvals and processes.

Financial Limit Ex GST	Financial Delegate
$10,000 or less	Approved Manager via CEO Delegation
$10,000 to $20,000	Approved General Manager via CEO Delegation
$20,000 to $50 000	Executive General Manager, Business Services
$50,000 to $100,000	Chief Executive Officer
$100,000 or above	Stanwell Board

5.2 Memberships and advertising

This Policy applies to corporate memberships held by Stanwell and does not extend to individual professional memberships or accreditations funded as part of an employee's professional development or employment arrangements.

Financial limit ex GST	Financial Delegate
Less than $5,000	In accordance with operational expenditure thresholds in the CEO Manual of Authorities
$5,000 or above	EGM or CEO (In accordance with operational expenditure thresholds in the CEO Manual of Authorities)

5.3 Corporate entertainment and hospitality

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

Expenditure[1,2]	Delegation
Equal to or less than $5,000 (inclusive) and equal to or less than $125 per person	Chief Executive Officer
Over $5,000 (inclusive) or over $125 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 Stanwell representative attending the event is responsible for payment and for ensuring expenditure complies with this Policy.

6.0 Supporting documentation

Appropriate documentation must be maintained to support expenditure incurred under this Policy and demonstrate compliance with its requirements. As a minimum, documentation must record:

- the purpose of the expenditure;
- the commercial, strategic or organisational benefit to Stanwell;
- the activity or event being supported;
- the basis for the expenditure, including any relevant agreement or invitation;
- approvals obtained in accordance with Stanwell's delegations;
- attendees or recipients, where applicable; and
- the expenditure incurred.

Supporting procedures may prescribe additional documentation requirements where necessary.

7.0 Responsibilities

The Board is responsible for approving this policy.
The Executive General Manager Business Services is responsible for administering and updating the policy.
Our people are responsible for ensuring that the policy requirements are complied with.

8.0 Review, Consultation and Communication

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

Consultation:
This Policy has been developed having regard to the Queensland Treasury Sponsorships, Memberships, Advertising, Donations, Corporate Entertainment and Hospitality Guidelines – Government Owned Corporations, Queensland Rail and Seqwater (July 2026).

Communication/Requirements after Update:
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.

9.0 Definitions

Word / Abbreviation	Definition
GST	Goods and Services Tax
Stanwell	Stanwell Corporation Limited

10.0 References

Queensland Treasury Sponsorships, Memberships, Advertising, Donations, Corporate Entertainment and Hospitality Guidelines – Government Owned Corporations, Queensland Rail and Seqwater (July 2026) as amended from time to time

Document No	Document Title
GOV-POL-31	Business Required Travel Policy
GOV-POL-30	Code of Conduct – The way we work at Stanwell
GOV-POL_21	Board Delegations of Authority
FIN-MAN-FIN_01	CEO Manual of Authorities
GOV-POL-26	Conflict of Interest Policy

GOV-POL-13	Gifts and Benefits Policy
STM-POL-02	Stakeholder Engagement Policy
STM-PRO-22	Stakeholder Engagement Procedure
STM-PROC-21	Sponsorships and Donations Procedure
PEO-PROC-78	Internal Employee Events

11.0 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
5	26.08.2021	Biennial review undertaken. No changes required at this review.	Karen Buckley	Michael O'Rourke	Board - BD-21-08-9.1
6	20.7.2023	Removal of references to internal events. These events do not constitute Corporate Entertainment & Hospitality and are governed by a separate procedure. Refer to 23/98201 for approval to publish	Aimee Munro	Glenn Smith	Board - BD-23-07-9.1.
7	29.05.2025	Biennial review undertaken. No changes required for this review.	Glenn Smith	Michael O'Rourke	Board - BD-25-07-9.1
8	28.08.2026	Updated to align with Queensland Treasury's July 2026 Sponsorships, Memberships, Advertising, Donations, Corporate Entertainment and Hospitality Guidelines.	Sophie Naughton	Michael O'Rourke	Board – BD-26-08-5.1