

Gifts, Entertainment & Hospitality Policy

1. Document Control

Document Title Gifts, Entertainment & Hospitality Policy

Version 3.0

Effective Date 01-12-2025

Owner HR & Compliance Department

Approved By Director & Chief Compliance Officer

Next Review Date 01-12-2026

2. Purpose

The purpose of this policy is to establish clear guidelines on the offering, acceptance, approval, and documentation of gifts, entertainment, and hospitality.

This ensures compliance with applicable anti-bribery and anti-corruption laws and Cisco's CPCA v3.0 requirements, maintaining transparency, integrity, and fairness in all business dealings.

3. Scope

This policy applies to:

- All employees, directors, and temporary staff of the Company.
- Third-party representatives, consultants, and agents acting on behalf of the Company.
- All business interactions with customers, suppliers, partners.

4. Policy Principles

- Gifts, entertainment, and hospitality must **never influence or appear to influence** any business decision.
- All exchanges must be **modest, transparent, and properly recorded**.
- **Cash or cash equivalents** are strictly prohibited.
- Any gift or hospitality that could create a **conflict of interest** must be declined or reported immediately.

5. Gift & Hospitality Limits

Category	Monetary Limit (INR)	Notes
Gift – Annual Meet	3, 000 per event/individual	Includes T-shirt/ bag distribution to all the employees during Annual Sales/ Employee Meet
Gift – Festivities	1,000 per event/individual	Sweet distribution during festivals
Gift – Customer	1,000- 5,000 per event/individual	Special gift for customers based on budgets.
Cash or gift cards	Prohibited	No exceptions permitted.

Cumulative limits: If multiple gifts or events occur within a short period from the same party, the combined value must be considered for approval and reporting.

6. Approval Matrix

All gifts, entertainment, or hospitality (given or received) must follow the below approval flow:

Value Range	Approval Required From
Up to INR 1,000	Employee may accept/give without prior approval, but must record.
INR 2,001 – 3,000	Reporting Manager approval required.
INR 3,001 – 5,000	HR & Compliance Department approval required.

Note:

- Approvals must be obtained **prior to offering or accepting** any gift or hospitality where possible.
- In unavoidable circumstances (e.g., cultural or diplomatic reasons), post-event declaration must be made within **3 business days**.

7. Recording Requirements

- All inbound and outbound gifts, entertainment, or hospitality must be recorded in the **Gifts & Hospitality Register** maintained by the HR/Compliance Department.
- The following details must be captured:
 - Date and description
 - Approximate value
 - Recipient/Provider name and organization
 - Purpose and context
- Records must be retained for a **minimum of five years** for audit and compliance purposes.

8. Prohibited Items

Employees and representatives must **not offer or accept**:

- Cash or cash equivalents (e.g., gift cards, vouchers)
- Personal favors or services
- Loans or discounts not available to the public
- Gifts or entertainment that create actual or perceived conflicts of interest
- Benefits offered during ongoing tenders, negotiations, or regulatory approvals

9. Declaration Form Template

A **Gifts, Entertainment & Hospitality Declaration Form** must be completed for:

- Any gift, entertainment, or hospitality **offered or received exceeding INR 2,000**, or
- Any instance requiring Compliance approval.

The form should include:

- Employee name and department
- Description and estimated value
- Source or recipient
- Purpose and occasion
- Manager's and Compliance's sign-off

10. Audit & Review

- The HR/Compliance Team shall review the **Gifts & Hospitality Register on a quarterly basis**.
- Internal audits may be conducted periodically to verify adherence to policy limits, documentation accuracy, and approval compliance.
- Any identified discrepancies or high-risk patterns will be reported to senior management and may trigger an investigation.

11. Non-Compliance & Consequences

Non-compliance with this policy may result in:

- Formal warnings or disciplinary action up to and including termination of employment.
- Reporting to relevant authorities if a violation constitutes bribery, corruption, or legal non-compliance.
- Termination of business relationships with third parties found to be in violation.

12. Training & Awareness


All employees must undergo **annual training** on this policy and related anti-bribery and anti-corruption standards.

Refresher communications will be issued when policy updates occur or as deemed necessary by the HR/Compliance Department.

13. Review & Amendment

This policy shall be reviewed annually or earlier if there are significant regulatory, business, or operational changes. Amendments must be approved by the Managing Director and recorded in the document control section.

14. Approval

Role	Name / Signature	Date
Director & Chief Compliance Officer	Moithili Raichoudhury  	13-11-2025
HRBP	Ankhi Chatterjee  	13-11-2025