

## GIFT & HOSPITALITY POLICY

5<sup>th</sup> March, 2024.

### SCOPE AND APPLICABILITY

As part of our ongoing commitment to maintaining a workplace environment that upholds the highest standards of professionalism, integrity, and accountability, we are hereby implementing a policy on accepting Hospitality and Gifting from our current and prospective vendors, customers and other external stakeholders (collectively termed as 'external stakeholders')

This Policy is applicable to all employees and individuals working at all levels and grades (whether permanent, fixed-term or temporary), consultants, contractors, trainees, interns, seconded staff, casual workers and agency staff, agents, or any other person associated with our Group and such other persons, including those acting on behalf of our Group from time to time.

As representatives of RP – Sanjiv Goenka Group, we are entrusted with upholding the highest ethical standards in all our professional interactions. Attending events hosted by or gifts extended by external stakeholders, may create situations where our objectivity and commitment to the best interests of the Group could be compromised. Moreover, such engagements may inadvertently lead to conflicts of interest or the appearance thereof.

### GIFT AND HOSPITALITY PRINCIPLES

Business gifts and hospitality are sometimes used in the normal course of business activity, as a means to build goodwill and strengthen working relationships among business associates. However, if offers of gifts or hospitality (including entertainment or travel) are frequent or of substantial value, they may create the appearance of, or an actual, conflict of interest or illicit payment.

The Group believes that it is not appropriate to accept gifts or personal hospitality from customers, suppliers or any other person or organization with which the Group has (or might have) business connections.

It is important to ensure that none of our employees act in any way that could create a sense of obligation by accepting the gift or personal hospitality. Recognizing that the Gifts and Hospitality Policy (hereinafter referred to as "The Policy") needs to be proportionate, the Group also deems some form of modest promotional gifts and certain corporate entertainment to be a legitimate part of business life. The Group is adopting this Policy to help its employees make appropriate decisions, when they are offered gifts or hospitality while conducting business or transactional dealings on behalf of the Group or when they want to offer gifts or hospitality to others.

The following principles should be applied while responding to offers of Gifts and Hospitality.

1. No Employee shall seek or solicit any kind of favours, cash or kind, directly or through, and / or for, spouse or any other relative, from external stakeholders.

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2. Buying goods and services from suppliers or any other external stakeholder for personal use at discounts is absolutely prohibited, unless the discount is offered by the concerned vendor to all its customers in its normal course of business.
3. All employees shall endeavour to ensure that they are not using similar services of any external stakeholder for their personal purposes, unless it is not possible for the concerned employee to avail such services from another vendor in the normal circumstances. In such an event, the concerned employee shall obtain prior approval of Chairman / Vice-Chairman / CEO / CHRO (Group or Company level), as appropriate.
4. No employee should attend a Vendor or any other outside organisation sponsored event / conference / social event which is extended to the employee as a free benefit by that organisation.
5. Accepting free / discounted / subsidised trips / holidays within India and / or abroad and / or members of employee's family, from external stakeholders is also absolutely prohibited.
6. In the event of it being essential to accept any such offer from an external stakeholder, the concerned employee may do so with prior approval of the Chairman / Vice-Chairman / CEO / CHRO (Group or Company level), as appropriate
7. In the event of it being essential to engage in a social meet-up with any external stakeholder to protect the interests of the group, it is advisable that the **concerned employee should bear the expense of such social meet-up** and seek reimbursement of the expenses as a business expense in compliance with applicable policies.
8. Small value gifts and flowers on festive occasions from anyone are normally acceptable but, high value gifts those in excess of Rs.500 should be reported to the CEO / CHRO, before acceptance.

Gifts and hospitality may be acceptable if they are reasonable, proportionate, made in good faith and in compliance with the Group's policies, inclusive of Group's/ Company's Ethics and Policy and various related advisories that may be issued from time to time.

To clarify, this policy applies to events explicitly organized and hosted by existing or prospective external stakeholders. It does not encompass:

1. Industry conferences (Ex:- Gartner , ISG, ICC , BCCI , ASSOCCHEM etc ) or events where you are registered and attending independently in your personal capacity and paid for by our Group/ any company
2. Vendor presentations or product demonstrations held on-site at our Group/ company facilities

Non-compliance with this policy shall be dealt with in accordance with the Group's Code of Ethics. In the event of any employee observed / reported to be non-compliant with the above policy, the onus of proving compliance shall remain with the concerned employee.

We appreciate your cooperation in adhering to this guideline. Any doubts in this regard should be clarified with the President- Group Corporate HR.