



Gift Policy

1. Purpose

To maintain integrity, transparency, and independence in all rating activities by regulating the acceptance and offering of gifts.

2. Scope

Applies to all employees, consultants, contract staff, and representatives of Shesh Rating Provider.

3. Policy Principles

- Ratings must remain unbiased and free from external influence.
- No gift or benefit should compromise—or appear to compromise—professional judgment.

4. Acceptable Gifts (Low-Value / Permitted)

Employees may accept only nominal-value items that do not influence decision-making:

- Value not exceeding INR 1,000.
- Promotional items such as pens, diaries, calendars, or simple corporate souvenirs.
- Perishable items of nominal value (sweets, snacks).
- Occasional hospitality that is reasonable and not frequent (e.g., standard tea/coffee during meetings).

5. Prohibited Gifts

Employees shall NOT accept or offer:



- Cash, gift cards, vouchers, or loans.
- Gifts exceeding INR 1,000.
- Expensive items such as electronics, luxury goods, or personal services.
- Travel, accommodation, holiday packages, or event tickets.
- Any gift from a client or stakeholder currently undergoing a rating assessment.
- Gifts exchanged with the intention to influence ratings or business decisions.

6. Offering Gifts on Behalf of Company

- Only low-value corporate promotional items (below INR 1,000) may be offered.
- No personal gifts to regulators, government officials, or clients.
- All company-funded gifts must be pre-approved by management.

7. Disclosure Requirement

Employees must declare any gift received, regardless of value, to the Compliance Officer within 2 working days.

8. Handling Improper Gifts

If an inappropriate gift is received:

- Politely decline or return the gift.
- Report the incident immediately to the Compliance Officer.
- If returning is not possible (e.g., perishable items), the item shall be surrendered to HR for appropriate disposal.

9. Recordkeeping

Compliance team will maintain a Gift Register with:



- Employee name
- Giver name and organization
- Description and estimated value
- Date and action taken

10. Violations

Non-compliance may result in disciplinary action, including removal from rating activities.

Approved by
Dr. Umang Shah
Board of Director
Shesh ESG Rating Private Limited
Effective Date: 01/10/2025