



## **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