

Gifting Policy

Policy No	Ethics-Gifting-2021-0.1	Effective Date:	1-Feb-2022
Policy On:	Gifting Policy	Review Date:	31-Dec-2022

1.0 Introduction:

1.1 It is recognized that the exchange of gifts with people with whom we transact business, is considered acceptable in many cultures. While it is understood that gifts are a part of normal social exchange, gifting may lead to obtaining or providing favours that are unacceptable and therefore prohibited. This document, under the overall guidelines of the TCOC, provides a framework for compliance on gifting and is applicable to all employees of Tata International as well as its subsidiaries and business associates.

1.2 The circumstances under which gifts might be received directly or indirectly fall into various categories. A few illustrative examples include:

1.2.1 Gifts received on festive occasions (e.g., Diwali, Christmas, New Year, National days, or any festival of significant importance in different countries of operations).

1.2.2 Gifts received on special occasions such as a wedding or an anniversary.

1.2.3 Gifts received in recognition of a professional contribution made by the recipient, such as for making a knowledge-sharing presentation, remuneration for a guest lecture, and related areas.

1.2.4 Gifts received on the occasion of a terminal event such as a transfer or on cessation of employment.

1.2.5 Gifts received during visits to vendor/business partner's location.

1.2.6 Gifts received in recognition for special contributions to certain events or activities.

1.2.7 Gifts received from current/potential customers or other related stakeholders in the industry.

1.3 An illustrative list of the kinds of gifts that are typically given/received are as follows

1.3.1 Articles of an edible nature.

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1.3.2 Articles of use in an office such as table clocks, stationery, desk accessories or any other novelty items.

1.3.3 Articles of personal use such as clothing, perfumes, household articles, white goods, etc.

1.3.4 Gold or silver coins, gift vouchers, etc.

1.3.5 Vouchers/Coupons.

2.0 Receipt of the gift from associated parties

2.1 If an employee receives a gift with a value of more than Rs 3500 / USD 50, or if the cumulative annual value of all the gifts he/she receives is more than Rs 7500 / USD 100, he/she shall mandatorily make a declaration of the gift and submit the gift along with the filled declaration form (please refer to Annexure A) to the Location Ethics Counsellor within 7 days of receiving the gift.

2.2 The Location Ethics Counsellors shall maintain the gift register for their respective locations by uploading the gifts declarations in a shared folder. Ethics closed community (with restricted access to the respective Location Ethics Counsellors and the Chief Ethics Counsellor) will be created on arK <https://tatainternational.sharepoint.com/sites/ARK> and format of the gift register will be available on this platform. Also, a quarterly update needs to be shared with the Chief Ethics Counsellor.

2.3 Use of infrastructure of business associates (use of guest house, use of car in another location) should be avoided. The employees are encouraged to make their own arrangements as far as possible.

3.0 Offer to any stakeholder by Tata International

3.1 Being a Tata company, the company will strive to uphold its value systems in every possible manner and on all occasions.

3.2 The company's representatives shall not indulge in any form of influencing external authorities in order to receive a favour while acting on behalf of the company. However, there are occasions when there is a need to give gifts, especially to associates.

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3.3 Gifts given on behalf of Tata International will be given only after obtaining the prior approval of the Business Unit / Functional Head. At his / her discretion, the head of the function will consult with the Chief Ethics Counsellor or the Managing Director before according his / her approval.

4.0 Positive assurance

Following practices will be carried out to ensure positive assurance among the Tata International employees to uphold the values of our organization:

4.1 Tata International considers it a good practice to share edible items with fellow employees.

4.2 On becoming aware of the gift, the concerned employee shall send a letter to the party who has offered a gift, to reinforce the company policy and guidelines under the Tata Code of Conduct.

4.3 Constant and regular Communication from Chief Ethics Counsellor to all workforce on key occasions/festivals to desist offering or receiving gifts.

4.4 Recognition for individuals who declare gifts received regularly.

4.5 The items declared will be auctioned and the resultant proceeds utilized for a good cause by the company.

5.0 Policy Breach / Disciplinary Action

Any breach or failure to abide by this Policy would be disclosed to the Audit Committee/Board of Directors of the company and appropriate action, including possible termination of services of the employee who committed the breach, would be initiated. Such action shall be in addition to any other rights or remedies that the Company may have against the defaulting employee under any applicable law. Our Company's Audit Committee will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy, and effectiveness. Our Company reserves the right to vary and/or amend the terms of this Policy from time to time.

Annexure A:

Gifts Declaration Format

1. Employee name: _____
2. Employee Id: _____
3. Vertical: _____
4. Description of gift: _____
5. Approximate value of the gift: _____
6. Date on which the gift was received: _____
7. Details of the gift giver (Name, Address and Profession): _____
8. Context/business purpose of the gift: _____
9. Accepted the gift (Yes/No): _____
10. If accepted, reason for accepting the gift: _____