

Gift Policy

1. Introduction

This Gift Policy is established to align with the requirements set forth by the Securities and Exchange Board of India (SEBI) in its Master Circular(s) governing ESG Rating Providers (ERPs). The policy seeks to define clear boundaries for employees' acceptance and offering of gifts, ensuring that all actions are conducted with integrity, transparency, and in strict compliance with relevant regulatory frameworks.

2. Applicability

This Policy applies to all individuals employed by Resurgent ESG, including both full-time employees and off-roll personnel (contractors, consultants, etc.). All employees are expected to familiarize themselves with this Policy and adhere to the guidelines provided.

3. Definitions

- **Gift:** Any item or service of value, which may include but is not limited to meals, refreshments, goods, services, event tickets, accommodations, travel-related expenses, discounts, charitable or political donations made on behalf of an employee, and prizes won through raffles or similar activities.
- **Token of Appreciation:** A gift that is of minimal or symbolic value, typically exchanged in the course of regular business interactions or during festive occasions, and does not create any obligation on the part of the recipient.
- **Business Hospitality:** Social or professional gatherings that involve meals, entertainment, or events, which are intended to support business discussions or foster professional relationships, and are proportionate to the business context.

4. Guidelines for Accepting and Giving Gifts

4.1 Prohibited Gifts and Benefits:

- Employees are prohibited from accepting or offering any gift, hospitality, or benefit that is unreasonable in its context or that could create a real or perceived obligation or influence over the recipient.
- Any gift or benefit intended to sway a business decision or that could be perceived as attempting to do so, irrespective of its value, is strictly forbidden.
- Offering gifts, travel, meals, or other benefits to government officials or private individuals is not allowed if it could be interpreted as an attempt to improperly influence an official decision or gain a business advantage for the Company.

4.2 Permissible Gifts and Hospitality:

- **Gifts:** Employees are permitted to accept or offer gifts, hospitality, or benefits that are reasonable and appropriate within their context. Such gestures must not create any real or perceived obligation or influence over the recipient, ensuring that all business interactions remain fair and transparent.
- **Tokens of Appreciation:** Employees may accept or offer small tokens of appreciation that are customary in business or cultural contexts, provided they do not create an expectation of preferential treatment.

- **Reasonable Business Hospitality:** Employees may participate in or offer business-related hospitality, such as meals or events, if it is reasonable, proportionate to the business relationship, and conducted in a transparent manner.

4.3 Specific Restrictions:

- **Cash or Cash Equivalents:** The giving or receiving of cash or cash equivalents (e.g., gift cards, vouchers) is strictly prohibited unless explicitly approved under a Company-sanctioned initiative.
- **Gifts During Competitive Processes:** Employees must not give or accept any gifts or benefits that are connected to a procurement process, tender, or any situation where the Company is in a competitive position.
- **Solicitation of Gifts:** Actively seeking or soliciting gifts from clients, vendors, or other business associates is not permitted.
- **Substituted Payments:** Employees must not offer or accept free services or discounts in place of payments unless part of an approved program.
- **Charitable Contributions:** Charitable donations that are made to disguise improper payments or to unduly influence a decision-maker are strictly prohibited.

4.4 Reporting Obligations:

- If employees are offered or receive any gifts, hospitality, or benefits that might contravene this Policy, they must report the details to the Compliance Officer without delay.
- Employees unsure about the appropriateness of a gift or benefit should consult the Compliance Officer for guidance before accepting or offering the gift.

5. Consequences of Non-Compliance

Violations of this Policy will be taken seriously and may lead to disciplinary actions, which could include termination of employment. The Company is committed to upholding the highest ethical standards and expects all employees to act accordingly.

6. Policy Review and Amendments

This Policy will be reviewed periodically and may be amended as necessary to reflect changes in legal requirements, regulatory guidance, or business practices. The Board of Directors must approve all amendments, and any significant changes will be communicated to all employees.