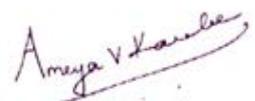


GIFTS
HOSPITALITY
POLICY

Document Control

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Introduction

- LEAP INDIA PVT. LTD. (defined as “LEAP”) has determined to formalize its policy on the provision and receipt of gifts and hospitality during its business.
- This Gifts and Hospitality Policy (the "Policy") will supersede any other existing LEAP policies relating to bribery and corruption.

Objectives

- LEAP recognizes that gifts and hospitality can be an important part of developing business relationships. However, caution should be taken in accepting or providing gifts or hospitality that could raise suggestions of impropriety or create a position of obligation on the part of the recipient.
- The objective of this policy is to provide a procedure to ensure that LEAP, together with its employees, vendors and contractors, may provide or receive gifts and/or hospitality, in compliance with high standards of integrity and all relevant laws and regulations applicable.

Application of the Policy

The Policy applies to all employees, vendors and contractors of LEAP. Compliance with this Policy constitutes terms of service for each director, conditions of employment for each officer and employee, and conditions of providing services to LEAP for each vendor and contractor. Each such person agrees to be bound by the provisions of this Policy upon notification of the most recent copy being given to them or upon notification that an updated version has been placed on the LEAP website for review.

Communication of This Policy

- To ensure that all employees, vendors and contractors of LEAP are aware of this Policy, a copy of the Policy will be provided to them for their review.
- All employees, vendors and contractors of LEAP will be informed whenever significant changes are made. New employees, vendors and contractors will be subject to this Policy and educated about its importance.

Compliance

- This Policy extends across all of the Company's business dealings and in all countries and territories in which the Company operates. All persons covered by this Policy, in discharging their duties on behalf of LEAP, are required to comply with the laws, rules and regulations applicable in the location in which LEAP is performing business activities, and in particular concerning anti-bribery and corruption laws, rules and regulations.
- As the anti-corruption laws of India have extraterritorial application, LEAP, its employees and associated persons will be bound by the most stringent requirements of these laws in respect of its conduct in all jurisdictions they operate, even if such conduct would otherwise be permitted by the local law of a particular jurisdiction. Where uncertainty or ambiguity exists, please contact the Anti-Corruption Compliance Officer who may seek further legal advice.

Annual Certifications

- All employees and vendors, together with such contractors of LEAP as the Management may decide, will provide annual certification of compliance with this Policy in the form available for review.
- The Compliance Officer of LEAP, Head of HR, will be responsible for ensuring that all annual certifications are obtained on or before the end of the first fiscal quarter of each year, and for providing written confirmation to the Management that such certifications have been obtained and summarizing the results there of.

Standards in Providing or Accepting Gifts or Hospitality

Employees, vendors contractors, and their families will not give or accept gifts, gratuities, or entertainment concerning LEAP or its business that may conflict with the provisions of this Policy. For clarity, all employees, vendors and contractors of LEAP must ensure that:

- The gift/hospitality is not given or accepted with the intention or expectation of influencing a party to obtain or retain business or a business advantage, or as a reward for the provision or retention of business or a business advantage, or in explicit or implicit exchange for favors or benefits;
- The gift or hospitality is customary in the industry;
- The gift or hospitality does not violate any local laws;
- Any gift or hospitality given is provided in the name of the Company and not in the name of the individual;
- The gift or hospitality does not include cash or a cash equivalent (e.g. vouchers, gift certificates);
- The gift or hospitality is of an appropriate type and value and given or accepted at an appropriate time, taking into account the business relationship with the counterparty, any pending action expected of the counterparty and the reason for the gifts/hospitality;
- The gift or hospitality would be considered as being appropriate by an independent third-party bystander in all the circumstances and in hindsight; and
- The gift/hospitality is given or accepted openly and not secretly.

Gifts & Hospitality to Public Officials

LEAP requires all employees, vendors and contractors to exercise great care when interacting with public officials and demands that they act with the highest level of integrity.

Prior approval must be obtained from the Compliance Officer for the making of any gift or the provision of any hospitality to a public official. Gifts or hospitality of an insignificant value such as promotional items (e.g. pens, notepads, diaries and calendars) or refreshments offered during a meeting are not covered by this rule.

Approval for Gifts & Hospitality

- Line managers are responsible for approving the receipt of gifts or hospitality of a monetary value of more than Rs.1000.00 and approving private practice requests from staff other than medical
- Gifts or hospitality to those other than public officials should never be offered or accepted without the prior approval of the Compliance Officer where the value of the gift or the hospitality per person is more than the limits notified internally and available from Head HR at any time. Gifts or hospitality of an insignificant value such as promotional items (e.g. pens, notepads, diaries and calendars) or refreshments offered during a meeting are not covered by this rule.

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- Care should also be taken that several smaller gifts or lower levels of hospitality are not provided to the same recipient thereby breaching the overall limits notified internally and available from LEAP's Head HR at any time. Recovery of the reasonable cost of a gift or hospitality provided may be claimed in accordance with LEAP's expense policies. When providing hospitality, a host from LEAP should always be in attendance at the event.
- Where a gift is received of a value more than the amount established by the Head HR from time to time (with the approval of the Management) and it would be impractical or offensive to return it (e.g. due to local customs), the Compliance Officer will decide whether it is appropriate to keep the gift or whether it should be donated to charity.
- Further, there may be occasions where employees, vendors and contractors of LEAP and their families are provided with more generous hospitality and it will be necessary to obtain approval from the Compliance Officer before accepting. If acceptance of the hospitality would leave any director, officer, employee, vendor, or contractor of LEAP in the position of obligation, it should be politely declined.

Gifts & Hospitality Register

All gifts and hospitality provided, received, or declined must be recorded in LEAP's Gifts Register which is maintained by LEAP's Compliance Officer in the below format.

- Recipient's name;
- Current position(s) held by the employee (within the LEAP);
- Date of offer and/or receipt;
- Details of the gift or hospitality;
- The estimated value of the gift or hospitality;
- Details of the supplier/offerrer (e.g. their name and the nature of their business);
- Details of previous gifts, hospitality K commercial sponsorship offered or accepted by this offeror/ supplier;
- Action taken to mitigate against a conflict, details of any approvals given and details of the officer reviewing/approving the declaration made and date;

- Whether the offer was accepted or not; and
- Reasons for accepting or declining the offer;

Conflicts of Interest

To avoid conflicts of interest, all employees at LEAP India must not accept or provide any gifts or hospitality that could influence or appear to influence their business decisions. Any gift or hospitality that could create a perceived or actual conflict of interest must be recorded in LEAP India's Gifts Register and surrendered. Employees should seek guidance from the Compliance Officer if they are unsure whether accepting or offering a gift could compromise their integrity or LEAP India's ethical standards.

Reporting Violations of This Policy - Whistle Blower

- All employees, vendors and contractors must adhere to LEAP's commitment to conduct its business and affairs in a lawful and ethical manner. All employees, vendors and contractors are encouraged to raise any queries with the Compliance Officer.
- In addition, any director, officer, employee, vendor and contractor of LEAP who becomes aware of any information suggesting that a violation of the Policy has occurred or is about to occur is required to report it to the Compliance Officer.
- People who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. LEAP aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. No employees, vendors or contractors of LEAP will suffer demotion, penalty, or other adverse consequences for raising legal or ethical concerns or for reporting possible wrongdoing, even if it may result in the Company losing business or otherwise suffering a disadvantage.
- LEAP also has adopted a Whistle Blower Policy which provides procedures for reporting violations of laws, rules, regulations, or LEAP's corporate policies, including a procedure for anonymous reporting.
- LEAP prohibits retaliatory action against any person who raises a concern in good faith.

Consequences of Non-Compliance

Failure to comply with this Policy may result in severe consequences, which could include internal disciplinary action termination of employment, or consulting arrangements without notice. Violation of this Policy may also violate or constitute a criminal offense under Indian laws. If it appears in the opinion of the Company that any director, officer, employee, vendor, or contractor of LEAP may have violated such laws, then LEAP may refer the matter to the appropriate regulatory authorities, which could lead to civil or criminal penalties for LEAP and/or the person responsible.

Review of Policy

The Compliance Officer of LEAP will review and evaluate this Policy on an annual basis to determine whether it is effective in ensuring compliance by LEAP, its employees, vendors or contractors with all relevant anti-corruption laws, rules and regulations.

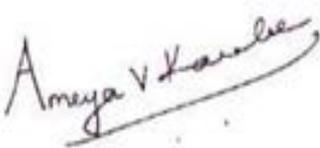
Queries

If you have any questions about how this Policy should be followed in a particular case, please contact the Compliance Officer of LEAP in the first instance.

Responsibility

All those people referred to within the scope of this Policy are required to adhere to its terms and conditions. Individual managers are responsible for ensuring that this Policy is applied within their area. Any queries on the application or interpretation of this Policy must be discussed with the Human Resources department before any action is taken. The Human Resources Head has the responsibility for ensuring the maintenance, regular review and updating of this Policy. Revisions, amendments, or alterations to the Policy can only be implemented following consideration and approval by the Managing Director.

For **LEAP India Private Limited**



Compliance Officer Details:

Name: **Dheeraj Sharma**

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Ameya V Karambe
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