



NOCIL LIMITED

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Corporate Gifting Policy

For NOCIL LIMITED

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S. R. Deo
Managing Director

Approved by Core Committee on Sustainability on 09.12.2022



NOCIL LTD (NOCIL) -CORPORATE GIFTING POLICY

Basis and Objective of the Policy: - The Corporate Gifting Policy has been enacted pursuant to the Code of Conduct adopted by the Board of Directors and it imposes a prohibition on **accepting and offering of gifts.**

Definition of the term “Gifts: - A gift is an item of cash or goods or any service of commercial value that is given to an individual for personal use/benefit without any return of payment and includes articles, gift vouchers of any value, any tangible or intangible benefit given or received without the expectation of payment or anything in return.

Applicability of the Policy: - The Policy covers **accepting or offering of Gifts by the Company’s** Executive Directors, Officers, Senior Managerial Personnel, Key Managerial Personnel, other officers, and Employees (whether on regular rolls or on contract basis) & Workmen.

Prohibition on Acceptance of Gifts : The Company’s Executive Directors , Officers, Senior Managerial Personnel, Key Managerial Personnel, other officers and Employees (whether on regular rolls or on contract basis) & Workmen are prohibited from accepting any Gifts (irrespective of value) from any of the Business Associates of the Company, including but not limited to the Suppliers, Contractors, Agents, Customers, Vendors, Dealers, Bankers, Consultants , Auditors, Lawyers/Law firms , or any other person or entity having any business or commercial relationship , whether one time or permanent or on a periodic basis with the Company or an entity or person which is being supported by the Company for CSR initiatives . The following are prohibited:





- a. Gifts in the form of cash or cash equivalent (gift vouchers) or anything that is illegal, unsavoury, or offensive or that brings in an agreement of reciprocal obligation whether immediate or at a later period should not be accepted on any occasions viz. marriage invitation, dealer meet, inauguration or launch of an event, achievement of milestone etc.
- b. Services provided by a business associate at nil or reduced cost. E.g., free boarding, transportation, lodging, free telephone facilities, free or subsidized tour packages etc. or other service when provided by any other person other than a near relative or a personal friend having no official dealings with the Company.
- c. Acceptance of any other expensive gifts in the form of goods like any electronic items like mobile phones, watches, cameras; jewellery, precious stones, or metals; etc. is prohibited and to be returned politely with a refusal letter (template attached).
- d. Any sponsorship by a business associate for the employee and/or their family members.
- e. Remuneration in cash for lectures/professional talks at public forum should be politely refused.
- f. No employee should accept or permit any member of his family or any other person acting on his behalf to accept any gift directly from Vendors, Dealers, Contractors, Suppliers, and anyone having business dealings with the Company or from their employees/relatives.





Exceptions: - Gifts in the form of flowers/fruits/sweets/food items/company souvenirs **if they are of nominal value** (to be defined by the top Management) on special festive occasions like Diwali, Dusshera, New Year are acceptable, subject to the following conditions:

- ✓ **The above referred acceptable gifts should be addressed to the Company rather than the individual handling the business transaction.**
- ✓ **Receipt of such gifts at residence or any other place other than work related places is prohibited.**

Prohibition on providing/Offering of "Gifts:

The Company's Executive Directors , Officers, Senior Managerial Personnel, Key Managerial Personnel, other officers and Employees (whether on regular rolls or on contract basis) prohibited from offering/providing any Gifts to any of the Business Associates of the Company, including but not limited to the Suppliers, Contractors, Agents, Customers, Vendors, Dealers, Bankers, Consultants , Auditors, Lawyers/Law firms , or any other person or entity having any business or commercial relationship , whether one time or permanent or on a periodic basis with the Company or an entity or person which is being supported by the Company for CSR initiatives



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Exceptions: - Gifts in the form of flowers/fruits/sweets/food items/company souvenirs **if they are of nominal value** (to be defined by the top Management) on special festive occasions like Diwali, Dusshera, New Year can be offered/provided acceptable, subject to the following conditions:

- ✓ Such gift should be infrequent and should not be seen as a favour extended to a section or group of people as a matter of gratification.
- ✓ In case of gifts required to be given on special occasions such as festivals & wedding etc. to business associates, the same matrix should be followed and should be claimed through an expense statement, clearly setting out the purpose for which the gift was made with the details of the recipient and duly authorized by the approving authority as applicable for Entertainment Expenses.
- ✓ In any event, the gift should be from and not from an individual employee or department.

Restrictions relating to Meals and Entertainment:

Attendance to lunches, dinner, and other ceremonies (seminars/lectures) are acceptable if these are part of normal business discussions or negotiations. Attendance at such events should not form part of a regular pattern of activity. Invitations to attend recreational events should be agreed beforehand by the employee's reporting officer. Non-business-related recreation provided free of charge by business associates is treated as gift and should only be accepted within the limits of this policy. All expenses made towards entertainment or of recreation should be reasonable and commensurate with the purpose and should be duly supported by bills and vouchers and reimbursement thereof claimed through expenses statement clearly stating the purpose and details of people involved and duly authorized by the approving authority as per Entertainment Expense Policy.

Disciplinary Action: Any deviation of this policy will be seen as violation of NOCIL's Code of Conduct and would result in disciplinary action.





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Standard Reply: Template of the suggested reply for the return of gifts

Date:

Dear Sir/Madam,

At the outset, thank you for your generous gift of _____. While we appreciate your gesture, we wish to inform you that as per our Company's Gifting Policy, **we are prohibited from receiving a gift of such disposition.** Hence, we would have to return the same and we hope you will understand and support us in promoting this policy within our organization.

Thank You Once Again.

With Best Wishes

- Provision of a gift register at the reception for any gifts which have come voluntarily.
- Also, intimation of gifts received or offer of gifts as defined above to their reporting manager. The reporting manager would inform the CCO on the same.

For NOCIL LIMITED

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S. R. Deo
Managing Director