

POLICY ON GIFTS AND ENTERTAINMENT

Name of the Document	Policy on Gift and Entertainment
Version	01
State whether Policy/Code/Manual Guideline	Policy
Issuing Authority	Rohit Otari (Compliance Officer)
Owners of the document	Nikeeta Kodre (Legal Officer)
Original date of document	14th April, 2025

M.I.T.R.A. Agro Equipments Pvt. Ltd.

Background and Objective

The Objective of the Gifts and Entertainment Policy is to provide guidance on receiving and giving gifts or hospitality. This Policy should be read in conjunction with the Code of Conduct and the Definition Guide.

Applicability

- The Policy applies to all our employees.
- If stricter norms are prescribed under any applicable law with respect to gifts and entertainment, then, the same will have to be complied.

Guidelines for Receipt and Offer of Gifts or Entertainment

- Employees shall not offer or accept gifts or entertainment to or from past, current or prospective customers, suppliers, distributors, dealers, consultants, government officials, fellow employees and to or from their relatives or close associates, except the following:
 1. Accepting or offering gifts that are appropriate in a required social context (eg. Marriage, retirement, festivals, etc.) subject to the following limits:
 - (a.) Value of the gift does not exceed INR 10,000/- or equivalent in local currency.
 - (b.) It is allowed once in a calendar year cumulatively from an individual and/or organization.
 2. In a cultural context applicable to business meetings, subject to the listed guidelines:
 - (a.) Up to INR 10,000/-
 3. To stakeholders during a launch:
 - (a.) Up to INR 10,000/-
 - (b.) Prior written approval from the relevant GEB member
 4. Where offered gifts of value exceed the permissible limit, politely refuse/return the same, citing Company Policy. If returning/refusing the gift is not possible, please handover the same to the

M.I.T.R.A. Agro Equipments Pvt. Ltd.

local Administration/Facilities Manager, who will consult with the Chief Financial Officer of the business for further action.

5. Invitation to a meal within the scope of social formality or professional requirements may be accepted, provided it is not extravagant or frequent.
6. Invitation to professional event (conferences/meetings/forums) maybe accepted, provided it does not create an actual or potential conflict of interest. No remuneration can be accepted. Any related travel or accommodation cost may be accepted only if borne by a not-for-profit organization and is within the limits of our Travel Guidelines. Sector HR Head should be given prior written intimation.
7. (a.) Invitation to sporting, cultural or other event which MITRA organizes/sponsors or to which MITRA has access may be offered or accepted with prior approval of the relevant GEB member.
(b.) Invitation to sporting, cultural or other events organized/sponsored by any business associates may be accepted with prior written approval of the President Group HR and relevant GEB/President Group HR and CEO of the concerned business, if exceeding INR 10,000 and with prior intimation to above authorities if the value is within INR 10,000.
8. In each of the above cases the employee should exercise judgement to ensure that the action is appropriate and does not create any undue influence or conflict of interest.
9. Under any circumstance, employees cannot demand gifts/entertainment within or beyond the allowable limit.

Approvals

- (a.) Combining a colleague's social event with business travel if proposed, should be mentioned in the travel requisition raised for such business travel.
- (b.) Any deviation to this policy will need the prior written approval of the Chief Ethics Officer.

M.I.T.R.A. Agro Equipments Pvt. Ltd.

- (c.) If there is a specific business need that goes beyond this policy, prior written approval of the President Group HR should be obtained.

Violation

Any possible breach of this policy will need to be notified to Chief Ethics Officer immediately, either directly by the employee or through the ethics helpline (ethics@mitraweb.in), if reported by others.

Consequence Matrix for GEGC/BEGC:

Sr. No.	Nature of entertainment transaction	Demanded/Solicited by employee	Received and availed by employees
1.	Within policy limits and prior intimation to relevant stakeholders (GEB member and President Group HR or CEO and President Group HR)	Separation	Complaint (since it is within the policy limit < INR 10,000 along with required intimation)
2.	Exceeding policy limits and not obtaining prior written approval from relevant stakeholders (GEB member and President Group HR or CEO and President Group HR)	Separation	Separation



(Padmapani Shardul)

(DGM-Human Resource and Administration)

M.I.T.R.A. Agro Equipments Pvt. Ltd.