

## **GIFT POLICY**

### **1. Introduction:**

This Gift Policy is being prepared in consonance with the Securities and Exchange Board of India (“SEBI”) Master Circular(s) for ESG Rating Providers (“ERP”).

### **2. Applicability:**

This Policy shall apply to all employees (includes Off-roll personnel) of SES ESG Research Private Limited (hereby referred as “SES ESG”).

### **3. Definitions:**

A Gift is anything of value and can take many forms including meals or refreshments; goods or services; tickets to entertainment or sporting events; the use of a residence, vacation home or other accommodations; a raffle prize; travel expenses; a product or service discount; or charitable or political contributions, etc. made on behalf of an Employee.

### **4. Requirements:**

4.1. Employees should never give or accept any gift, entertainment, consideration, benefit or privilege where the value

- is not reasonable in its business context or
- places the recipient under a real or perceived obligation to the giver.

4.2. Gifts that are intended to or would result in favorable treatment or influence a business decision, regardless of the amount or value involved, should never under any circumstances be given or accepted.

4.3. Providing gifts, travel, meals or entertainment to a public official or private individual is never permitted if it could reasonably be understood as an effort to improperly influence an official action or obtain a business advantage for SES ESG.

4.4. An employee should not accept, and should notify Compliance Officer if offered, any gifts, entertainment or anything else of value from a competitor, customer/client or anyone who conducts or seeks to conduct business with SES ESG, other than (i) Nominal Gifts or (ii) Ordinary Business Entertainment, as those terms are defined below.

4.4.1. Nominal Gifts are gifts of token to modest value that will not place the recipient under any real or perceived obligation to the donor or gifts used for advertising or promotion, as long as they are customarily given in the regular course of business.

4.4.2. Ordinary Business Entertainment, such as lunch, dinner, theatre, sporting events and the like, is appropriate provided it is reasonable in its business context and the purpose is to hold bona fide business discussions or to foster better business relations.

4.5. Specific prohibitions include:

4.5.1. Cash or cash-equivalent may not be given or received – this can include cheques, travelers cheques, money orders – unless given or received under a SES ESG - sanctioned sponsored program.

### **SES ESG RESEARCH PRIVATE LIMITED**

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4.5.2. Any gift or entertainment, irrespective of amount, which is, or appears to be, linked to a competitive procurement or bidding process

4.5.3. Soliciting or encouraging gifts to be given by business contacts

4.5.4. Providing a service or subscription for free in lieu of payment, for which SES ESG would otherwise charge, excluding any SES ESG sanctioned program in connection with regulators or regulatory agencies;

4.5.5. Charitable giving used as a mechanism to conceal payments made to improperly Influence anyone with decision making authority

4.5.6. Gifts or Entertainment that is not permitted under this Policy, must be returned

In any of the above events, compliance officer should be notified immediately.

#### **5. Requirements:**

For queries related to the Policy, about Gift or its reasonableness, Employee should seek guidance from the Compliance Officer prior to acceptance.

#### **6. Disciplinary Action:**

SES ESG takes violations of this Policy seriously. Failure to comply with this Policy, could result in disciplinary action up to, and including, termination of employment.

#### **7. Amendment and Policy review:**

The Company reserves its right to amend or modify this Policy in whole or in part, at any time, without assigning any reason whatsoever, with the concurrence of the Board.