

# **Gifts & Hospitality Policy**

## **(Version 1.0)**

**GIFTS & HOSPITALITY POLICY**
**Document Change Control**

<b>Version</b>	<b>Date</b>	<b>Reason for issue</b>	<b>Issued by</b>
1.0	December 06, 2024	To assist in taking right decisions at the time of providing or accepting gifts and hospitality/entertainment while conducting business on behalf of Company.	Board of Directors

**Document Approval**

<b>Role</b>	<b>Date</b>
Board of Directors	December 06, 2024

**Distribution List**

<b>Name</b>	<b>Role/Particulars</b>
Anyone	This policy to be posted in company intranet, website or notice board of the corporate/unit office or any other channel or mode of dissemination for distribution to all employees, retainers, consultants, outsourced staff and other stakeholder.

**Document Control**

Classification	Public
----------------	--------

**Contents of the Policy**

1. Introduction .....	4
2. Statement of Policy .....	4
3. Applicability .....	4
4. Purpose of the Policy .....	6
5. Definitions .....	6
6. Gifts/ hospitality which are permitted to be given and/or accepted* .....	7
7. General Guidelines about accepting or giving a gift / hospitality .....	8
8. Don'ts/Not acceptable:.....	9
9. Self – Approval Test: .....	10
10. Approvals/Exceptional approvals: .....	10
11. Declaration and record-keeping.....	10
12. Events conducted by / sponsored by / partnered by the company .....	11
13. Events held by third parties (For e.g. Trade seminars and summits).....	11
14. Duty to notify.....	11
15. Responsibility .....	11
16. Exemption .....	11
17. Non-compliance .....	12
18. Clarification .....	12
19. Reporting concerns.....	12
20. Affirmations.....	13

## GIFTS & HOSPITALITY POLICY

---

### 1. Introduction

Cygnus Medicare Private Limited (herein after referred as “CMPL” or “the Company”) requires that all its employees practice and demonstrate unbiased professionalism, highest standards of ethical conduct, and non-discriminatory actions in the performance of their duties and functions in relation to potential vendors, suppliers, customers, government officials, regulatory agencies and business partners, without expectation of any undue favor or reward on either side.

Gifts are benefits of any kind given to someone as a sign of appreciation or friendship without expectation of receiving anything in return. They include ‘courtesy gifts’, which are small gifts given at recognized occasions or special times of the year. Hospitality generally includes refreshments, meals, and accommodation. Entertainment generally includes attendance at plays, concerts, and sports events.

This policy deals with both giving as well as accepting of gifts & hospitality to and from third parties.

### 2. Statement of Policy

Exchange of gifts is normal and is an accepted business practice throughout the world and can enhance business relationships when conducted appropriately. Relationships must be based on integrity and sound business decisions. However, gifts can also create a perception of conflict of interest that can undermine the integrity of our business relationships and could be subject to potential abuse.

The company is committed to maintain the highest standards of ethics and ensuring that any gift received or provided is compliant with all applicable anti-bribery and anti-corruption regulations. This policy aims to provide guidelines relating to gifts.

### 3. Applicability

The policy covers all units and offices of the Company and its subsidiaries, joint ventures and associates and is applicable to all officers, key managerial personnel, directors, employees (permanent, contract, part-time, including Board of Directors), agents, vendors, venture partners, business partners, customers, associates, contract /sub-contractors, interns and other third-parties/affiliates/intermediaries working with the Company (hereinafter, collectively referred as “**Covered Persons**”). The policy applies to agents, vendors, venture partners, business partners, customers, associates, contract /sub-contractors, interns and other third-parties/affiliates/intermediaries to the extent of their work/engagement/assignment/transaction with the Company.

No individual or body associated with it can waive compliance with this policy except mentioned in Section 16. This Gifts and Hospitality Policy applies to the giving and receiving of gifts by such above mentioned persons, their family and any other person or entity acting at their direction.

Adherence to this policy is mandatory and nobody can waive compliance with this policy except mentioned in Section 16. In each of the jurisdictions that the company operates in, the

## **GIFTS & HOSPITALITY POLICY**

---

Covered Persons are expected to follow the policy and requirements under applicable law. In case of violation of this policy, Company may initiate disciplinary actions under Company's policies or applicable law, whichever is more stringent.

## GIFTS & HOSPITALITY POLICY

---

### 4. Purpose of the Policy

- a) To comply with laws such as Foreign Corrupt Practices Act, 1977(FCPA), UK Bribery Act, 2010(UKBA), Prevention of Corruption Act, 1988 (PCA) and any other applicable laws.
- b) Assist Covered Persons in taking right decisions at the time of providing or accepting gifts and hospitality/entertainment while conducting business on behalf of Company.

### 5. Definitions

**5.1 Gift:** A gift means any payment, gratuity, gratification, present or advantage (pecuniary or not), offered or received. In a business environment, "Gifts" cover items such as, but not limited to:

- Presents, goods, equipment
- Personal discounts, commissions or other forms of remuneration,
- Cash, payments, loans or advances or cash equivalents like gifts certificates, gift vouchers, shopping cards, etc.
- Stocks, shares, equities
- Free services, for instance payment towards insurance premium, tuition fees, repair or improvement works or any preferential treatment.
- Honorarium
- Promotional items or use of a giver's time, materials and facilities.

**5.2 Hospitality and Entertainment:** Hospitality means any form of amenity, entertainment, travelling or accommodation or invitation offered or received. In a business environment, "Hospitality" covers items such as but not limited to:

- Meals: breakfast, lunch, dinner, cocktails, receptions,
- Hotel accommodation,
- Travel, Transportation by car, air, train or boat,
- Seminars, conventions,
- Invitations to sporting, cultural or social events like IPL matches, concerts, etc.

**5.3 Government and Public Officials:** Government and Public officials include, but are not limited to:

- A public official, whether foreign or domestic; includes all paid, full-time employees of a government department or agency (whether in the executive, legislative or judicial branches of government and whether at the national, provincial, state or local level).
- Government officials can also include part-time workers, unpaid workers, individuals who do not have an office in a government facility, and anyone acting under a delegation of authority from a government to carry out government responsibilities.
- Any official or employee, regardless of the rank, of any government, local body or semi-government department including government hospitals and health care facilities e.g. hospitals under the (i) Central Government Health Scheme, (ii) Ex-Servicemen Contributory Health Scheme and (iii) Directorate General of Health Services (iv) State Government Health Schemes;

## GIFTS & HOSPITALITY POLICY

---

- an elected official (for example, a mayor, legislator, chief minister or city council member);
- an officer or employee of any government-owned or government-controlled company, whether domestic or foreign (for example, an employee of a government-owned customer or government-owned joint venture partner);
- Members of public assemblies;
- A member of a royal family who has official governmental responsibilities;
- An administrator or supervisor in an intelligence agency or government department;
- Judges or employees of courts;
- Employees of autonomous bodies;
- a candidate for political or elected government office or a party official, whether foreign or domestic;
- an officer, employee, or representative of a public international organization (for example, the World Bank, the World Health Organization, or the United Nations); or
- a private person acting in an official capacity for or on behalf of a governmental entity or any public international organization (for example, a government environmental consultant acting under governmental authority);
- Spouses and family members of any of the individuals specified above

**5.4 Family:** It would include spouse, mother, father, son, daughter, brother, sister or any of these step- or in-law relationships, whether established by blood or marriage including common law marriage.

**5.5 Healthcare Professional (HCP):** It means any member of the medical, dental, or nursing professions or any other person who in the course of his or her professional activities may prescribe, recommend, or administer a pharmaceutical product.

## 6. Gifts/ hospitality which are permitted to be given and/or accepted\*

**6.1 Customary gift given:** The Company allows giving of certain Gifts which are customary in nature and as a token of courtesy, they are as follows:

- Articles of edible nature;
- Symbolic Gifts, articles of use in office such as table clocks, stationery, desk accessories, etc. which carries the Company or any third-party logo and which shall be put to office use rather than personal use.

The customary gifts given should be of nominal value (upto INR 5,000/- per person/per gift/per event or occasion) and care must be taken while exchanging such customary gifts. This includes gifts given to both government and public officials and private parties.

Further, the gifts shall be given of a nominal value not greater than INR 5,000/- per person with the prior approval of Chief Financial Officer and Head-Human Resource for private parties and prior approval of Unit Head of the Hospital, Chief Financial Officer and Compliance Officer for government and public officials.

## GIFTS & HOSPITALITY POLICY

---

Acceptance of gifts/hospitality/entertainment of any kind shall be strictly prohibited and not allowed under the policy.

**6.2 Gifts given to government and public officials:** Any gifts/hospitality/entertainment, excluding customary gifts as explained in section 6.1 above, to government and public official shall be strictly prohibited.

**6.3 Gifts exchange (giving) with private parties:** Giving of gift should be of a nominal value not greater than INR 5,000/- per person/ per gift /per event or occasion with the prior approval of Chief Financial Officer and Head-Human Resource. Gift being given of value greater than INR 5,000 per person/per gift must remain exceptional and on prior approval from the Management Directors. Further, in all such cases of gifting, it is recommended to include reason for gifting example, festival season, new year, first time meeting, customary event, visit of dignitary to the Company premises etc.

The Company discourages receipt of any type of gifts by Covered Persons from its external stakeholders (such as customers, vendors, agents and other third-party representatives). Receipt of gifts are not acceptable by any persons mentioned above and it is recommended that gifts should be politely refused and returned. Any violation of the aforesaid gift receiving policy shall constitute a serious misconduct.

**6.4 Hospitality given (includes private parties and government and public official):** The offering of hospitality, including food and drink is limited to INR 5,000/- per person per event/occasion for government officials and/or third parties with the prior approval of Chief Financial Officer and Head-Human Resource. If the threshold is likely to be exceeded, then a detailed business rationale should be provided to Chief Financial Officer and Head-Human Resource and approved by the Management Directors. The Company discourages any practice of receiving hospitality by directors, key managerial persons, officers and employees from its external stakeholders (such as customers, vendors, agents and other third-party representatives)

*\*Please note that by providing the above value limits, accepting or offering of gifts/hospitality/entertainment of less than or equal to "appropriate" values with the intent of or prospect of influencing the recipient's or provider's business decision-making is not allowed.*

## 7. General Guidelines about accepting or giving a gift / hospitality

- Gifts, hospitality, and entertainment must be modest, reasonable and infrequent so far as any individual recipient is concerned.
- No Gifts, hospitality, and entertainment shall be offered/received in cash and proper record must be kept.
- The payments/expenses incurred on gifts, hospitality, and entertainment shall not be linked with any official work.
- Acceptance of gifts/hospitality/entertainment of any kind shall be strictly prohibited and not allowed under the policy. Covered Persons are advised to politely declined any gifts.
- Gift / hospitality shall be motivated to express esteem or gratitude (and shall not be with any illicit intention to further Company's business).



## GIFTS & HOSPITALITY POLICY

---

- Never offer a Gift / hospitality that would violate the receiver's policy to accept it.
- Gifts, hospitality, and entertainment must never be offered or provided with the intent of causing the recipient to do something favouring the Company or to refrain from doing something disadvantaging the Company.
- No airline travel, whether domestic or international, is to be provided to any person, contractor, vendor or any third-party including government and public official without prior approval of Chief Financial Officer and Head-Human Resource.
- Regardless of the amount, Covered Persons should never accept/give:
  - Gifts of cash or its equivalent (e.g. Stock, bonds or other negotiable instruments); or
  - Any other business courtesy given in an attempt to motivate Covered Persons to do anything that is prohibited by law, regulation or company policy.
- Gift/Hospitality provided is disclosed in a transparent manner and reported to the management in Gift & Hospitality tracker/register.
- Gift/Hospitality provided is in the name of the company and not in the name of an individual.
- Gift/Hospitality does not violate any laws or regulations, to the extent known, policies of the recipient's employee.
- Expense claims of purchase of gift items/hospitality shall clearly specify to whom the same has been given, organizational affiliations/titles, the occasion due to which gift is being given, copy of purchase invoice and copy of necessary approvals.
- Gift/Hospitality to any Healthcare Professionals (HCP's) shall be in accordance with Uniform Code of Pharmaceuticals Marketing Practices ("UCPMP") and Indian Medical Council (Professional Conduct, Etiquette, and Ethics) Regulations 2002 ("MCI Regulations").

### 8. Don'ts/Not acceptable:

- Gifts/Hospitality/Entertainment to government officials must never be given/provided other than mentioned in section 6.1
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided in return
- Acceptance of gift or hospitality or entertainment which is very frequent (where frequency may be considered inappropriate)
- Acceptance of luxurious/expensive gifts, hospitality or entertainment
- 'Adult' entertainment or any event involving nudity is never appropriate
- Travel, lodging, meals and other similar expenses for a Public Official/Government Official or business partner's spouse, children, other family members or travel companions that are not directly related to a legitimate Company business purpose are never appropriate
- Do not provide entertainment to any participant to Company business meetings, or comparable events, unless the entertainment is an appropriate and incidental part of such events. Do not pay for any side or extended trips.
- Do not pay for the entertainment, hospitality, travel costs of anyone who accompanies an invitee to Company business meeting, or comparable event.

## GIFTS & HOSPITALITY POLICY

---

Covered Persons should consult the Chief Financial Officer and Head-Human Resource when in doubt about appropriateness of any event, location or expenditure.

### 9. Self – Approval Test:

- Before providing any gifts, hospitality or entertainment, the following should be considered:
  - Would it be embarrassing if the details of gifts, hospitality or entertainment are made public?
  - Would you feel disgraceful if read about in newspapers/magazines?
  - Does the offer of the gifts, hospitality or entertainment influence or appear to influence the judgement in any way?
  - Is it possible to reciprocate the gifts offered as per the Company's policy?
  - Whether the gifts provided can be perceived as a bribe?
- If the answer to any of the above questions is 'YES' or unclear all stake holders are suggested not to provide any gifts or hospitality in such situations.

### 10. Approvals/Exceptional approvals:

#### 10.1 Gift/Hospitality within limits:

Covered Persons must disclose and obtain approvals for Gift/Hospitality within limits provided as mentioned in Section 6 above.

#### 10.2 Gift/Hospitality exceeding limits:

Company expects all the Covered Persons to strictly adhere to the limits defined for gifts, hospitality or entertainment within this policy. In case of an exception, pre-approval has to be obtained from Chief Financial Officer and Head-Human Resource.

### 11. Declaration and record-keeping

**11.1 Gifts given to government and public officials and private parties:** All gifts given, by company employees to third parties must be recorded in a separate Gift Register to be maintained by the Head-Human Resource. The following details for gifts given to be provided for entry into the gift register.

- Recipients name and employer
- Details and value of gift provided
- Approver of the gift
- Reason for providing gift

**11.2 Review of gift register:** The gift register will be reviewed on a quarterly basis by the Ethics and Compliance Committee. The gift register must be maintained and available for inspection and retained without limit in time. .

**11.3 Review of reimbursement claims/ invoices of hospitality:** With respect to expenses incurred on hospitality, copy of vendor invoices/ reimbursement claims must be maintained by the finance team with sufficient details such as details of attendees, organizational

## **GIFTS & HOSPITALITY POLICY**

---

affiliations/titles, food bills, purpose of meeting and any other document supporting the expense incurred.

For all expenses incurred on extending hospitality to government and public officials, details (as explained above) should be reviewed by the Chief Financial Officer.

### **12. Events conducted by / sponsored by / partnered by the company**

**12.1** The company may conduct seminars / summits / events at various locations and may also sponsor / partner various events. In all such events, the hospitality extended to the government/ customers/ third parties should not seem to be an inducement or attempt to influence them in an unfair manner.

**12.2** The company/its Covered Persons/doctors may organize technical sessions, medical education events, symposium and other industry events where third parties might be required to pay registration fee. Provided that such registration fee is standard amongst each participant, such payments shall not be treated as a gift under this Gift and Hospitality Policy.

### **13. Events held by third parties (For e.g. Trade seminars and summits)**

Upon receiving invitations to attend events organized by third parties, the employees may accept the invitations only after seeking requisite approvals from their immediate supervisor. At the time of attending such events, symbolic gifts can be accepted.

### **14. Duty to notify**

The Covered Persons are required to professionally inform individuals or firms or companies with business relationships or potential business opportunities with the Company of this "Gift and Hospitality Policy".

### **15. Responsibility**

- If any Covered Persons receives a Gift / hospitality which is in contravention to this policy, such Gift, shall immediately be reported to the immediate reporting manager and/or the Compliance Officer, as the case may be.
- Respective unit/department heads are responsible and accountable for any non-compliance with this policy for their unit/department.
- Gifts/Hospitality/Entertainment provided will be maintained and tracked by the respective unit/department and reported to Head-Human Resource and Chief Financial Officer on a monthly basis.
- Chief Financial Officer will review, evaluate and report the details of the gifts, hospitality or entertainment provided to the management on a quarterly basis.

### **16. Exemption**

Any exception to this "Gift and Hospitality Policy" may be made only with the written permission of the Ethics and Compliance Committee of the Company.

**GIFTS & HOSPITALITY POLICY**

---

**17. Non-compliance**

- Any Covered Persons found to be in violation of this “Gift and Hospitality Policy” will be subject to disciplinary measures in accordance with the disciplinary policies and code of business conduct of the Company.
- The Covered Persons can confidentially report a violation of this policy or potential violation of this policy by writing to the Ethics and Compliance Committee or through the whistleblower mechanism (Details stated in Whistleblower policy).
- Violations of this policy will be dealt with strictly and will impact the performance evaluation of the employee. Repeated violations may lead to the termination of employment and/or legal proceedings.

For further details refer Whistleblower policy.

**18. Clarification/Approvals**

In case of any clarification or interpretation of this policy, the Covered Person may contact the Human Resource (HR)- Head, the Compliance Officer, Unit Head, Unit HR, Chief Financial Officer or the Ethics and Compliance Committee.

The Covered Persons can reach out at the following email address for approvals in relation to this policy:

Designation	Email Address
Chief Financial Officer	inani.p@ujalacygnus.com
Head – HR	HeadHR@ujalacygnus.com
Compliance Officer	ruchi.hans@ujalacygnus.com

Wherever, the policy necessitates approval from Unit Head of the Hospital, the Covered Persons [other than officers, key managerial personnel, directors, employees (permanent, contract, part-time, including Board of Directors)] shall address an approval email to Chief Financial Officer and Compliance Officer along with the name of the Unit/Hospital. The Chief Financial Officer shall a seek relevant Unit Heads approval before according his/her approval.

**19. Reporting concerns**

Any concerns about a colleague, vendors, agent or representative of the Company in connection with giving or receiving of Gifts & Hospitality can be raised anonymously by writing a mail to [eccommittee@ujalacygnus.com](mailto:eccommittee@ujalacygnus.com). This facility is available to not only employees but also extended to vendors, business partners etc. Concerns can be reported in confidence and without fear of retaliation.

Gifts and Hospitality policy is continually evolving. This policy, neither can, nor intends to, encompass every situation. The document may undergo changes based on business requirements and changes in law and regulations.

## **GIFTS & HOSPITALITY POLICY**

---

### **20. Affirmations**

The Company shall take affirmation from each Employee and Director that he/she has received and read the “Gifts and Hospitality Policy” and that he has also understood the provisions contained in the said policy at the time of induction and annually.