



# Brickwork Ratings **Gift Policy**

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December 2022

**GIFT POLICY OF BRICK WORK RATINGS P LTD**

<b>Details</b>	
<b>Primary Owner</b>	<b>Compliance Department</b>
<b>Applies to</b>	<b>Brickwork Ratings</b>
<b>Effective Date</b>	<b>To be notified</b>
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## **GIFT POLICY OF BWR**

### **1. Applicability & overview**

BWR is committed to doing business strictly based on the value of products and services offered and purchased and not on the basis of gifts or offers received. BWR has very stringent rules in place that Employees are required to adhere to.

### **2. Definition**

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 residence, home vacation or other accommodations, a raffle prize, travel expenses, a product or service discount or charitable or political contribution etc., made on behalf of the Employee.

The employees of Brickwork Ratings Pvt Ltd are required to adhere to the following guidelines pertaining to giving or receiving gifts. This policy is applicable to all employees of Brickwork Ratings Pvt Ltd. This policy is updated in line with the SEBI circular dated November 1st, 2016, on “Enhanced Standards for Credit Rating Agencies”.

For guidance, refer this document or speak with your manager/CP or Compliance Officer.

### **3. General Guidelines**

- I. You May:
  - a. Give or accept inexpensive tokens or items of nominal value.
  - b. Give or accept occasional and moderate business meals and entertainment with clients, customers, or vendors if you attend the event; or
  - c. Attend corporate/cultural/sporting events or other activities with clients, customers, or vendors infrequently.

II. You May Not:

- a. Give or accept gifts or entertainment that could influence decisions.
- b. Give or accept gifts or entertainment that could appear to create a conflict of interest; or
- c. Give or accept cash as a gift.

*Remember:* Ask yourself whether giving or accepting a gift or entertainment could create a potential, perceived or actual conflict of interest.

Employees can accept a client wedding invite with the information of functional Head or compliance officer. The employees can gift a bouquet of flowers up to maximum of Rs.1000 to be reimbursed by the company. Further, the employee should not accept any gift in the client invited wedding function that is against the policy of the company.

**As a rule, a gift should be reasonable and within the limit of Rs.10,000/-. However, all gifts of value: Rs. 5,000/- or above, need to be reported to the Compliance Officer within 5 working days of receipt of the gift.**

**Employees should not solicit or encourage any business contact to offer them a gift.**

There are certain gifts that are always improper and should not be solicited or accepted at any point in time.

- d. Any gift in the form of cash or cash equivalent.
- e. Any gift that is extravagant or lavish in nature
- f. Any gift that is concealed and not offered openly and transparently
- g. Any gift that is given to influence the employees work at BWR

Some examples of acceptable and unacceptable gifts are as follows:

- a. A ball point pen is of nominal value and would be acceptable, but a gold wristwatch is not acceptable.
- b. Ticket to an ordinary sporting event is of nominal value is acceptable but to an extravagant show like the world cup is not acceptable.
- c. Hotel stay during the client visit/management meeting is acceptable. Any holiday vouchers for future stay are unacceptable. The meal shared by a client and an employee as business expense should be reimbursed by BWR.

#### 4. Specific Guideline on acceptance/giving Gifts

**a. Q. Can I give expensive IPL tickets to a potential new client?**

**A:** No. Never give a gift, regardless of cost, with the intention or the appearance of influencing decision-making or obtaining special treatment.

**b. Q. Can I give a box of chocolates and BWR branded & approved collateral to a new business client?**

**A:** Yes, it is permissible to give an inexpensive token of appreciation to celebrate the closing of a transaction.

**c. Q. I have received an expensive gift, which is above the permissible value limit. What should I do?**

**A:** You should immediately notify the compliance officer, and hand it over to the admin staff to return the same to the sender.

**d. Q. I have received a perishable item as gift, which is above the permissible value limit that cannot be returned. What should I do?**

**A:** Document the receipt of the gift in the gift register in your office and hand it over to the admin staff. They will try to either donate it to an appropriate charitable entity or distribute amongst the staff for immediate consumption.

#### 5. Violation

- a. Any violation of the above policy will be viewed very seriously, and stern action may be taken against the employee by the management of Brickwork Ratings Pvt Ltd.

#### 6. Amendment and Review of the Policy:

- b. However not in contravention of the regulations, Brickwork Ratings Pvt Ltd reserves its rights to amend or modify this policy in whole or in part at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the employees and the stakeholders unless the company publicly notifies the same.

- c. The compliance officer shall be responsible for the administration, interpretation, application, and review of this policy. In case of clarification or interpretation of this policy, the employees may contact the compliance officer.

## **7. Disciplinary Action**

BWR views violations of this policy seriously. Failure to comply with this Policy will result in disciplinary action up to and including termination of employment.