

**RAYCHEM-RPG PRIVATE LIMITED**  
**Anti-Bribery and Anti-Corruption Policy**

**Gifting Guidelines**

**i. Gifts**

The Company allows giving gifts of nominal value, such as corporate calendars, pens, mugs, and small food items (*preferably branded with the Company's logo*), to employees of current or prospective clients (*public or private*) or Business Partners.

**Giving Gifts:** These gifts must be given in the ordinary course of business and for business purposes only and must be in accordance with the guidelines below:

- (i) Such gifts are not intended to induce the recipient to confer any business advantage in return;
- (ii) **No Cash is to be paid;**
- (iii) The Employee or Representative giving such a gift does so only on behalf of the Company;
- (iv) Gift threshold and approval shall be as per below Delegation of Authority:

Table 1

| Giving Gifts                  | Range                                                                                                                                                                                                                | Approving Authorities                               |                                    |                                                  |     |     |
|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|------------------------------------|--------------------------------------------------|-----|-----|
|                               |                                                                                                                                                                                                                      | Location HR/<br>Location<br>Admin/HRBP<br>/ Corp HR | Respective<br>Functional<br>Op-com | Respective<br>Functional<br>Ex-comm<br>/<br>CHRO | CFO | CCO |
| Gifts to<br>External<br>Party | <b>(i) Festival Gifts Budget Approval</b>                                                                                                                                                                            | ☑                                                   | ☒                                  | ☒                                                | ☒   | ☒   |
|                               | <b>(ii.a) Other Gifts</b><br>Up-to <b>INR 5000/- per person</b><br>(Indian Rupees Five Thousand)<br>(or its equivalent foreign currency)                                                                             | ☑                                                   | ☑                                  | ☒                                                | ☒   | ☒   |
|                               | <b>(ii.b) Other Gifts</b><br>Exceeding <b>INR 5000/- per person</b> (Indian Rupees Five Thousand) and below <b>INR 25,000/- per person</b> (Indian Rupees Twenty-Five Thousand) (or its equivalent foreign currency) | ☒                                                   | ☒                                  | ☑                                                | ☑   | ☑   |
|                               | <b>(ii.c) Other Gifts</b><br>Equal to and exceeding <b>INR 25000/- per person</b> (Indian Rupees Twenty-five Thousand) (or its equivalent foreign currency) including category (i) above                             | ☒                                                   | ☒                                  | ☑                                                | ☒   | ☑   |
|                               | <b>(iii.a) Gift to government Official</b><br>Equal to or below <b>INR 2000/- per person</b> (Indian Rupees Two Thousand) (or its                                                                                    | ☑                                                   | ☑                                  | ☒                                                | ☒   | ☒   |

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|-----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|---|---|---|
|                                               | <i>equivalent foreign currency</i> ) including.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |   |   |   |   |   |
|                                               | <b>(iii.b) Gift to a government official</b><br>Exceeding <b>INR 2000/- per person</b> (Indian Rupees Two Thousand) ( <i>or its equivalent foreign currency</i> ) including.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | ☒ | ☒ | ☑ | ☑ | ☑ |
| <b>Table legends and Approval explanation</b> | <p>1) ☑ represents the approval required from each concerned authority represented in above table.</p> <p>2) ☒ represents no approval required by concerned authority represented in above table.</p> <p>3) For categories <b>ii.a</b> and <b>iii.a</b>, two approvals are required: location HR partner <b>and</b> Respective Functional Op-Com.</p> <p>4) For categories <b>ii.b</b> and <b>iii.b</b>, two approvals are required: <u>any one from Ex-Com or CHRO and CFO or CCO.</u></p> <p>5) For category <b>ii.c</b>, two approvals are required: any one from Ex-Com or CHRO <b>and</b> CCO.</p> <p>6) It is clarified that for any categories in the table above maximum financial threshold for gift approval within above DOA is maximum up-to INR 25000/- per person (Indian Rupees Twenty-five Thousand) (<i>or its equivalent foreign currency</i>).</p> <p>7) Category <b>ii.a</b> does not include gifting to government officials.</p> |   |   |   |   |   |

- (v) A gift may be allowed to be given to a customer, vendor or channel partner, in case an invitation is received by the Company/ Company employee(s) for any events/gatherings like weddings, housewarming, office opening or birthdays. Gifts will strictly be (i) within the financial threshold of gifting limits provided in Table 1 above and (ii) shall only be with prior approval as per the DOA above.
- (vi) No Gifts Allowed to a customer/representative who is a government official under the following circumstances:
- to a government official of a Government Company, during, before or after a tender is issued/floated by a Government Company and Raychem RPG participates in such tender, whether individually or in partnership with any other entity or supplier; whereas the “after tender” period shall be upto 3 months after allotment of tender to Raychem RPG; or
  - Raychem RPG is a supplier/sub-contractor to the selected contractor under such tender for supply to such Government Company or in any other manner indirectly supplying any of its goods or services to any Government Company.
- (vii) Any gift to a government officer or any officer of a statutory body or a quasi-statutory body is generally not encouraged, however, if a gift during any occasion is to be given to any such official, it shall be as per the DOA provided in above Table 1 and within the financial threshold therein.
- (viii) No gifts to any government official is allowed if it is contrary to this Policy or a Country’s public policy or concerned ministry/department guidelines to which such an officer serves or any applicable law to Raychem RPG and/or such government official.
- (ix) In no event any gift (*even of insignificant value*) can be provided to the US Government Officials.

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**“Government company”** means any company in which not less than fifty-one per cent of the paid-up share capital is held by the Central Government, or by any State Government or Governments, or partly by the Central Government and partly by one or more State Governments and includes a company which is a subsidiary company of such a Government company.

Explanation:- For the purposes of this clause, the “paid-up share capital” shall be construed as “total voting power”, where shares with differential voting rights have been issued.

**Receipt of Gifts:** Gifts received must be in the ordinary course of business and for business purposes in accordance with the guidelines below:

- (i) Any small value gifts including sweets and flowers on festive occasions from anyone less than the value of INR 2000/- (*or its equivalent foreign currency*) are normally allowed to be accepted by Employees (refer DOA).
- (ii) Company Employees may receive/accept the gifts from the Company’s current or prospective clients, vendors, or any commercial partners as per the DOA and of value provided below.
- (iii) Any gift above the value of INR 2000/- (*or its equivalent foreign currency*) in extraordinary circumstances, needs to be specially approved as per below DOA before acceptance.
- (iv) **Any gift received more than once a year from the same external party of any value** should not be accepted as a general guideline. In exceptional circumstances it should be approved as per below DOA.
- (v) No cash is allowed under this Policy.

**Delegation of Authority for receipt of gift by employees:**

Table 2

| Receipt of Gifts                      | Range                                                                                                                                                                                    | No Approval | Immediate Superior | CCO | CEO |
|---------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|--------------------|-----|-----|
| Gifts Received from an External Party | Festival Gifts of sweets/dry-fruits/flowers<br>Less-than INR 2000/- ( <i>or its equivalent foreign currency</i> )                                                                        | ☑           | ☒                  | ☒   | ☒   |
|                                       | Other Gifts<br>Less-than or equal to INR 2000/- per person in a year ( <i>or its equivalent foreign currency</i> )                                                                       | ☒           | ☑                  | ☒   | ☒   |
|                                       | Other Gifts<br>Greater than INR 2000/- per person in a year ( <i>or its equivalent foreign currency</i> )                                                                                | ☒           | ☒                  | ☑   | ☑   |
|                                       | Gifts more than once a year from the same external party of any value                                                                                                                    | ☒           | ☒                  | ☑   | ☑   |
| Table legends                         | 1) ☑ represents the approval required from each concerned authority represented in above table<br>2) ☒ represents no approval required by concerned authority represented in above table |             |                    |     |     |

In all circumstances, the intention behind the gift should always be considered before giving or receiving any item of value.