

Name of Document	Gift and Entertainment Policy
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State whether Policy/Code/ Manual/ Guideline	Policy
Group Level/ Sector Level (Specify sector)	Mahindra & Mahindra Financial Services Ltd.
Issuing Authority	Manish Sinha CHRO – Mahindra Finance & FSS
Owner of the document	Code of Conduct Committee
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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:

Acceptable:

- 1 Accepting or offering gifts that are appropriate in a required social context (e.g., marriage, retirement, festivals, etc.) subject to the following limits:

- a. Value of the gift does not exceed INR 5,000 or equivalent in local currency.
 - b. It is allowed once in a calendar year cumulatively from an individual and/or organization.
2. 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 hand over the same to the local Administration/Facilities Manager, who will consult with the Chief Financial Officer of the business for further action.
 3. Invitation to a meal within the scope of social formality or professional requirements may be accepted, provided it is not extravagant or frequent.
 4. Invitation to a professional event (conferences / meetings / forums) may be 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 organisation and is within the limits of our Travel Guidelines. Respective Steering Committee member should be given prior written intimation.
 5. Invitation to sporting, cultural or other events which Mahindra Finance organises/sponsors or to which Mahindra Finance has access may be offered or accepted with prior approval of the GEB Member.
 6. In each of the above cases the employee should exercise judgment to ensure that the action is appropriate and does not create any undue influence or conflict of interest.

Approvals :-

- Combining a colleague's social event with business travel if proposed, should be mentioned in the travel requisition raised for such business travel.
- Any deviation from this policy will need the prior written approval of the Code of Conduct Committee.

Violation :-

- Any possible breach of this policy will need to be notified to the Code of Conduct Committee immediately, either directly by the employee or through the ethics helpline ethics@mahindra.com, if reported by others.

Sd/-

Manish Sinha

CHRO – Mahindra Finance & FSS