

GIFTS & INVITATION POLICY

I. Purpose

This policy defines the framework within which Elior India Group wishes to develop its relationships with suppliers, customers and public administrations in accordance with the Elior India's Anti-Corruption & Bribery Policy, Integrity & Ethics guidelines available at <https://integrity.eliorgroup.net/> and the laws applicable in India. Each employ working in Elior India or its affiliates must adhere to its Policies and shall strictly comply with its norms. Elior India does not tolerate any act of corruption.

II. Objectives

This gifts and invitations policy is an information tool for our customers, suppliers, potential partners and for employees in the fight against corruption in the context of our business or activities. This Policy applies to Elior India's Management, Employees, Contractual workers, Clients/Customers, Professional Consultants, Agents, Suppliers, Operators, Sales & Marketing and Vendors etc. to comply with Elior's standard rules and regulations to be compliant in every aspect.

III. Responsibilities

Elior India commits to ensure our full compliance with anti-corruption laws. It is strongly recommended to prohibit offering and receiving gifts or invitation or any other benefits in compliance with Anti-Corruption & Bribery Policies. It is essential that we all be vigilant because of the considerable impact of the risks that can be incurred from a financial, reputational, legal and criminal point of view.

The principles adopted by the Elior India are therefore as follows:

- Total prohibition to offer or receive gifts or other benefits, to or from suppliers, customers, politicians, civil servants, consultants or intermediaries for the purposes of improperly and unlawfully obtaining, retaining or assigning contracts or deals. Such acts will be punished by disciplinary measures up to and including immediate dismissal.
- It will only be possible to offer or receive gifts or invitations in order to promote the Elior's brand image and/or to strengthen good business relationships, provided that their value is limited enough to remain symbolic and have no influence in a commercial decision-making process. However, under no circumstances may cash gifts be offered or accepted.
- In any case, it should be reminded in particular that a gift or invitation, to or from third parties:
 - must not benefit families but must remain in a professional setting instead, except in exceptional circumstances;

- must not be given (or received) more than twice a year, to or by the same person;
- must not be given (or received) in exchange for a commercial relationship or a particular benefit;
- must not be offered during the tender process;
- must not be sent or received at home (in the case of a gift), but at the workplace;
- must be made (in the case of an invitation issued) where possible in a restaurant or a site operated by Elior, directly or indirectly;
- must be offered after a formal verification (written certificate) of consistency with the internal policy of the recipient's employer.

The rules to be followed are:

- gifts and/or invitations received or offered with an individual value **less than INR 5,000**: can be received/offered without any particular formality other than those existing, for example, in the control of expense reports.
 - gifts and/or invitations received or offered with an individual value **greater than INR 5000 but less than INR 15,000**: obligation to complete the attached forms (offered or received) which must be approved in advance by the line manager. A copy of this form must be systematically sent to the *Company Secretary & Legal*.
 - gifts and/or invitations received or offered with an individual value **greater than INR 15,000 but less than INR 40,000**: obligation to complete the attached forms (offered or received) which must be approved in advance by the CEO or by the HRD. A copy of this form must be systematically sent to the *Company Secretary & Legal*.
 - Gifts and/or invitations received or offered with a value **greater than INR 40,000**: not authorized, unless expressly agreed by the Elior Group's CEO, and this on a very exceptional basis, and upon prior notification to the *Group Chief Compliance Officer* through *Company Secretary & Legal*.
- It is also strongly recommended to refer to the Elior integrity guide to comply with main rules to be applied in preventing corruption and some practical recommendations.

IV. Non-Adherence

The Policy specifies the good practices defined in the Group's Elior integrity & Ethics guide, which all persons concerned must respect or otherwise be subject to disciplinary sanctions, which may go as far as immediate dismissal, depending on the seriousness and frequency of the events.

V. Prevention and detection of corruption

The prevention, detection and reporting of corrupt practices is the primary responsibility of all the employees working with Elior India or its affiliates as per the norms defined in the Integrity & Ethics guidelines. Any employee who witnesses a breach of this policy is obliged to promptly report the matter to the dedicated line for whistleblower as per **Group Elior Whistle blower charter** by contacting the compliance consultant through email at alert.eliorgroup@isope.solutions or by calling on **India help line No 0008003201479** or reporting the matter to **Company Secretary & Legal**.



Sanjay Kumar
MD & CEO-Elior India

Bangalore India
February 26th, 2020

ANNEXURE I :GIFT & HOSPITALITY FORM (IN CASE THE GIFT IS GIVEN & RECEIVED)

This form shall be completed only when the amount of the gift/hospitality is **over and above INR 5,000**

Key:"True Value" : The market value (not black market value) of the gift/hospitality plus any additions, not the actual cost (if any) to the giver/host.

Giver of Gift / Host of Hospitality (Elior / Client/ Supplier/ Consultant)	
Gift / Hospitality Event details	
Reason for Gift/Hospitality	
Date of Event	
Have we checked that the policy of the company of the beneficiary allows him to accept our gift or our invitation?	
Number of gifts/hospitality already given from the beginning of the year	
Spouse / Partner / Family Member invited? If so, please provide details.	
Overnight / Stay(s) included?	
Air Travel included?	
True Value of Hospitality for all recipients / invitees	
True Value (means market value (not black market value) of the hospitality plus any additions, not the actual cost (if any) to the giver/host.)	
Tender process underway?	Yes / No If yes, do not accept/receive.

What should you do next?

Category	Total True Value (for au recipients / invitees)	What next?
Gift / Hospitality	Under INR 5,000	No approval required
Gift / Hospitality	Over INR 5,000 to INR15,000	Please obtain your Line Manager's consent and forward this form, to your Company Secretary & Legal for retention with the records.
Gift / Hospitality	Between INR 15,000 and INR 40,000	Please obtain your Line Manager's consent and forward this form, to Company Secretary & Legal for approval of the CEO and then for record.
Gift / Hospitality	Over INR 40,000	Not possible but agreement from the Group's CEO

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Colleague Name

.....
Date

.....
Line Manager Name

.....
Date

.....
Company Secretary & Legal Signature

.....
Date

.....
Date Approval Received from Elior Group's CEO

CATEGORISATION OF GIFTS AND HOSPITALITY

CATEGORY	EXAMPLES	WHAT YOU SHOULD DO
<p>A. DO NOT ACCEPT</p> <p>Generally, High value gifts & hospitality over INR 40,000/- in value which might look as if it has been offered to compromise personal judgement and integrity.</p>	<ul style="list-style-type: none"> Financial gifts (money /gift /vouchers/discounts etc. Membership of or subscription to clubs Tickets to sporting or Social events Holidays 	<p>THESE CANNOT BE ACCEPTED</p>
<p>B. CAN BE ACCEPTED</p>	<ul style="list-style-type: none"> Supplier conference / educational trips Food hamper Tickets to sporting or similar events An evening meal Bottle of wine Flowers Books 	<p>THESE CAN BE ACCEPTED IF APPROVAL RECEIVED AND COMPLETE THE ATTACHED GIFT AND HOSPITALITY FORM AND SEND IT TO COMPANY SECRETARY & LEGAL</p> <ol style="list-style-type: none"> Line Manager approval if over INR 5000/- up to INR 15000/- Leadership Team approval for over INR 15000/- up to INR 40000/- Elior Group's CEO approval if over INR 40000/-
<p>C. CAN BE ACCEPTED AND KEPT BY THE INDIVIDUAL</p> <p>Very low value items (a few INR at the most) such as marketing gifts given out at conferences or pens and note pads given out on training courses.</p>	<ul style="list-style-type: none"> Working lunches and other low value refreshments Pens Key rings Mugs Note pads Diaries 	<p>THESE CAN BE ACCEPTED</p> <p>Their receipt does not need to be included in the gifts and hospitality register and therefore does not need a Gift and Hospitality Form to be completed.</p> <p>However the correct assessment of the gift/hospitality received is under the responsibility of the receiver. If an under assessment is then detected, sanction actions could be taken according to the size.</p> <p>For any avoidance of doubt, it is recommended to validate the assessment with the line manager.</p>