

Corporate Gift Policy



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1. Purpose

Tech Mahindra (referred to as ‘Company’) is committed to maintaining the highest standards of ethics. Our relationships with stakeholders must be based on integrity and sound business decisions. Giving or receiving reasonable gifts can be part of normal business relationships. This policy provides guidelines to help associates make informed decisions regarding gifts.

When dealing with customers, partners, or government officials, associates must ensure that any gift offered, given, or received gifts is of reasonable and nominal value, complies with the recipient’s local laws and corporate regulations, and is infrequent, and is not intended to influence actions or decisions.

Gifts given or received cannot exceed the maximum limit defined by the Company under section 3.1 and 3.2 of this policy.

Gifts may also create a perception of conflict of interest, potentially undermining the integrity of our business relationships and are subject to potential abuse. The Company sets specific limits on the types and value of gifts permitted to accept and give in connection with employment and requires visibility and disclosure of all gifts.

2. Scope

This policy applies to all associates of Company globally for the receipt or offering of gifts to or from any associate of Tech Mahindra, customers, partners (including alliance partners and business associates), government official, agent or representatives and vendors. It also includes all potential associates, customers, partners, and vendors.

This policy outlines the value of gifts that can be given or received, those that are prohibited, and explains associated record keeping requirements.

The gift policy supplements, incorporates, and should always be read in conjunction with Company’s policy on anti-corruption and anti-bribery. For clarity, the Company’s policy on code of ethical business conduct (CEBC) and the anti-corruption and anti-bribery shall always prevail over this gift policy.



3. Value and Reporting of Gifts

All types of gifts, including flowers and cake, must be considered while computing the value of gift given or received. Associates must ensure the gifts given are not in conflict with the client's gift policy.

In some cultures, or countries, it may be seen as an insult to reject a gift, and we appreciate that it may adversely affect business relationships if associates refuse to accept a gift. In these circumstances, please ensure the approval matrix defined in section 3.1 is followed.

Associates are required to record the details of gift received within five working days of receipt of a gift on the gift management tool <https://hr.techmahindra.com/Giftmanagment/Login.aspx>. The concerned team will decide whether to allow you to keep the gift, retain the gift for the benefit of Tech Mahindra, return the gift, or sell the gift and give the proceeds to charity. If the approving authority is uncertain as to how to treat the gift, associates may seek clarification from their relevant HR or the Corporate Ombudsman at CORPORATEOMBUDSMAN@techmahindra.com.

Receiving sponsorship for Tech Mahindra events or sponsoring events for clients or customers should comply with the anti-bribery and anti-corruption policy of the Company.

3.1 Receiving gifts: The maximum value of gift(s) limit allowed per associate from a client, customer, or vendor per year is USD 100.

Associates must declare all gifts received in the corporate gift management portal upon receipt, irrespective of value.

Any gift that exceeds the USD 100 per year will require prior approval from:

- SBU head or reporting manager (for SBU head and above)
- Chief People Officer (CPO)

3.2 Giving Gifts: The maximum value of gift(s) that can be given to an individual customer representative, partner (including alliance partners and business associates), government official, agent or representative, all potential associates and vendors in Company's financial year is USD 100.

Any gift that exceeds USD 100 per year will require prior approval from:



- SBU head or reporting manager (for SBU head and above)
- Chief People Officer (CPO)

Gifts given in the form of tickets and passes for customer visits, events festivals, and country level events should be routed through the marketing team. A Tech Mahindra associate should be part of the events along with the clients where tickets are sponsored.

Personal milestones and celebrations (marriage, childbirth, birthday) should not be considered for corporate gifting purposes.

It is not acceptable to give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to facilitate, expedite, or reward any action or procedure.

Gift or hospitality to a government official, agent or representative must always be approved by legal.

Claims submissions must include explicit details of the amount per customer representative and the number of instances gifts have been given to each customer representative.

Gifts must be procured through corporate services and should be Tech Mahindra branded in line with branding guidelines from the marketing team. Standardization will be done by corporate services in conjunction with marketing.

For more details, please read the Company's anti-corruption and bribery policy.

4. Recordkeeping – Corporate Gift Register


All associates must update details of gift receipt or offering of gifts with additional information through the claims system on the gift management tool within five working days, along with supporting bills. The gift management tool can be accessed at <https://hr.techmahindra.com/Giftmanagment/Login.aspx>

Gifts Received:

- Associate name and details of the gift received
- Name and company name of the person providing the gift or benefit

Gifts Provided:

- Recipient's name and employer
- Details and value of the gift provided

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- Reason or desired outcome for providing the gift

5. Associate Audits

There may be periodic audits of gifts received or given by associates. In such instances, associates may be required to provide details, including additional information or confirmations if requested by auditors.

6. Additional Guidelines

When deciding on the appropriateness of giving or receiving a business gift, associates are encouraged to consider the following aspects:

- How it compares in value to the usual gift-giving practices in the applicable industry and country
- whether any legal or local country regulations restrictions exist
- The total value of business gifts to or from that person or entity in the current year
- The suitability of the business gift
- The impact of the business gift on building positive business relations with the recipient or provider of the business gift
- Whether an objective party would consider the business gift to be reasonable
- Gifting jewellery, clothes, cash or cash equivalents, donation to charity must always be avoided
- If an associate intends to offer, they must receive advance approval from approver per the matrix under section 3.1 and 3.2 respectively

7. Violations and Disciplinary Actions

Any violation of this policy, incorrect declaration of gift policy, failure to declare gifts received and given in the tool will result in disciplinary action, including termination from employment.