



EMPLOYEE GIFT POLICY

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ATULAYA HEALTHCARE PVT LTD

EMPLOYEE GIFT POLICY

Objective

This policy governs the gifts that are exchanged, gifted or received by the employees of the organization. It is applicable to gifts within the organization or gifts received from outside the organization including vendors/suppliers as well as between professional connections made on behalf of the organization.

The purpose of this policy is to establish uniformity in the gifting culture within the organization and restrict any conflicts of interest.

Scope

This policy is applicable to all permanent, temporary or contractual employees of the company including the Group Companies of Atulaya Healthcare Pvt Ltd.

Policy

Definition of Gift

A gift is an item of cash or goods or any service of commercial value that is given to an individual for personal use/benefit without any return of payment.

Under this policy, the company strictly prohibits soliciting any gifts or favours from any employees, associates or agencies and their representatives; with whom he deals on an official basis.

Employees should make sure that any such gift or favour does not lead to an unfair change of preferences or conflict of interest.

However, as an exception, Human Resources may seek gifts in the form of sponsorships from agencies dealing with for use in corporate-wide events.

Exception

- Any gift that of the nature of food, entertainment or accommodation of reasonable value/ up to Rs. 500/-
- Any mementoes or souvenirs, or
- Any gift in the form of donation or charity, or
- Any gift received as the team, or

- Any gifts exchange during the festival or other ceremonial occasions.
- Any gift received as a member of the public.

However, such exemptions will not stand true if the management feels that such gifts may influence the employee's decision making or be perceived unfair by the other employees.

Procedure

On receiving any such gift that does not fulfil this policy, the employee shall politely request the giver to take it back. This should also be informed about the executive in charge. The suggested reply for the return of gifts are attached.

In such a case where it is impractical or discourteous to return the gift, the employee may declare and surrender the gift or favour to the HR as soon as possible.

If the giver or the gift is anonymous, it should be handed over to the executive in charge who may treat the gift as charity or donation.

In circumstances where the gift involves gifts such as meals or trips, the employee may accept this only with the prior permission of the CEO/Directors. However, such actions should not influence business decisions.

Disciplinary Action:

Any deviation of this policy will be seen as violation of Atulaya's Code of Conduct.

Any employee who accepts money, gifts, favour or benefits for an inappropriate purpose or of an inappropriate monetary value will be liable to disciplinary action, to be investigated by Disciplinary Committee.

Disciplinary actions may include immediate termination of employment or business relationship or any other necessary action based on the severity of the breach at Company's sole discretion.

Treatment of Food Items Received as Gifts

Any gift received that is edible in nature should be shared amongst all the employees. In the case of perishable food items, it should be shared by the employees present during that time. In the case of non-perishable food items, employees who are absent at that time should be rendered with their share whenever they are present the next time.

Non-Compliance

Non-compliance with this policy may attract severe penalty and disciplinary actions such as expulsion.

Template of Refusal Letter

Dear,

Date:

At the outset, thank you for your generous gift of _____. While we appreciate your gesture, we wish to inform you that as per Atulaya's Corporate Gifting Policy, we are prohibited from receiving a gift of such disposition.

Hence, we would have to return the same and we hope you will understand and support us in promoting this policy within our organization.

Thank You Once Again.

With Best Wishes