

GIFT & TRAVEL POLICY

1. PURPOSE:

The purpose of this policy is to provide clear guidelines on the acceptance and offering of gifts, hospitality, and business travel arrangements to ensure ethical business practices, prevent conflicts of interest, and comply with anti-bribery and corruption laws.

2. SCOPE:

This policy applies to:

- All employees, contractors, and representatives of HMA Industries Pvt. Ltd.
- All business interactions with suppliers, customers, consultants, and other stakeholders
- Both domestic and international operations

3. GENERAL PRINCIPLES:

- Gifts and hospitality must never influence, or appear to influence, business decisions
- Employees must not solicit gifts or travel benefits from business partners
- All gifts and travel expenses must comply with local laws, cultural norms, and company policies.
- Transparency and proper approval are required for any gift or travel arrangement

4. GIFT POLICY:

4.1 ACCEPTABLE GIFTS:

- Low-value promotional items (e.g., pens, diaries, calendars)
- Modest festive gifts customary to local culture (within approved limits)
- Occasional meals or refreshments during business meetings

4.2 PROHIBITED GIFTS:

- Cash or cash equivalents (e.g., gift cards, vouchers)
- Lavish or extravagant gifts that may create a sense of obligation
- Gifts given during contract negotiations, tenders, or regulatory approvals

4.3 MONETARY THRESHOLDS:

- Any gift exceeding ₹5,000 (or equivalent) must be reported and approved by the Compliance Officer

4.4 REPORTING & RECORDING:

- All gifts received or given above the approved threshold must be recorded in the Gift Register
- Employees must submit a Gift Declaration Form for compliance review

5. HOSPITALITY & ENTERTAINMENT:

- Business meals, hospitality, and events must have a legitimate business purpose
- Extravagant entertainment, luxury trips, or events unrelated to business are not permitted
- Any hospitality exceeding the approved limits must be pre-approved by the Compliance Officer

6. TRAVEL POLICY:

6.1 BUSINESS TRAVEL AUTHORIZATION

- All business travel must be pre-approved by the relevant manager and Finance Department
- Travel must be strictly for business purposes with detailed itineraries

6.2 TRAVEL EXPENSES COVERED BY THIRD PARTIES:

Employees should not accept travel or accommodation sponsored by suppliers, clients, or business partners unless explicitly approved by Senior Management

6.3 TRAVEL CLASS & STANDARDS:

- Domestic travel: Economy class unless otherwise approved
- Accommodation should be within reasonable business standards (no luxury hotels without approval)

6.4 REIMBURSEMENT & DOCUMENTATION:

- Employees must submit original receipts for reimbursement within 7 working days of return
- Travel advances must be settled promptly with supporting documentation
- Personal expenses are not reimbursable

7. ANTI-BRIBERY & CONFLICT OF INTEREST

- Gifts, hospitality, or travel must not be used to influence business decisions
- Any offer that may appear as a bribe must be reported immediately
- Employees must disclose potential conflicts of interest related to gifts or travel

8. APPROVAL PROCESS:

- Line Manager Approval for gifts and travel within normal limits
- Compliance Officer Approval for exceptions or high-value items
- Senior Management approval for extraordinary circumstances

9. VIOLATIONS & DISCIPLINARY ACTION:

- Non-compliance with this policy may result in disciplinary action, including termination of employment
- Violations may also lead to legal consequences under anti-bribery and corruption laws

10. GRIEVANCE & REPORTING:

- Employees can report policy violations through the company's Whistle-blower Mechanism
- Reports will be handled confidentially without retaliation

11. POLICY REVIEW & UPDATES:

- This policy will be reviewed annually to ensure alignment with legal, ethical, and operational requirements

12. ACKNOWLEDGMENT:

I acknowledge that I have read, understood, and agree to comply with the Gift & Travel Policy of HMA Industries Pvt. Ltd.

APPROVED BY:

M. Zubair Rahman

Managing Director

Date: 10-04-2024