

GIFT & HOSPITALITY POLICY

1. Purpose

This policy defines the company's approach to giving and receiving gifts or hospitality to ensure that all business dealings of Kumoh EMS India Pvt. Ltd. are conducted with integrity, transparency, and fairness. The company seeks to prevent any real or perceived conflict of interest or undue influence in business relationships.

2. Policy Statement

Kumoh EMS India Pvt. Ltd. does not encourage the giving or receiving of gifts or hospitality that could influence, or appear to influence, a business decision. Employees must act in a manner that upholds the company's ethical values and professional reputation at all times.

3. Permitted Gifts or Hospitality

Reasonable, low-value, and customary gestures may be accepted or given only when all the following apply:

- The gesture is of modest value (e.g., small token gifts, company-branded items, refreshments, or customary festive greetings).
- It is openly given and not linked to any business Favor or decision.
- It does not involve cash or cash equivalents.

4. Prohibited Actions

Employees and business partners shall not:

- Offer or accept any gift or hospitality intended to influence a business decision.
- Accept cash, vouchers, or personal benefits from suppliers, customers, or contractors.
- Request gifts, sponsorships, or Favors in return for business advantages.

5. Reporting and Disclosure

Any gift or hospitality that may exceed a modest value must be disclosed to the Department Head or HR/Compliance Officer. Uncertainty should always be reported rather than ignored — transparency is expected.

MONTH & YEAR	15.09.2025
DC NO:	KEI/ESG/GHP/05
REV.NO	00

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6. Disciplinary Action


Violations of this policy will be treated seriously. Depending on the nature of the breach, disciplinary action may include warning, suspension, or termination of employment or vendor contract.

7. Review

This policy will be reviewed annually by the Compliance Officer and approved by management to ensure it remains relevant and effective.

Authorized Signatory:

Prepared by



(HSE Officer)

Approved by



(Managing Director)