

GIFTS AND BUSINESS ENTERTAINMENT POLICY

DOCUMENT CHANGE CONTROL

MAJOR VERSION	MINOR VERSION	DATE OF CHANGE	CHANGE OWNERSHIP	CHANGE(S)
1	0	November 14, 2024	Legal	
	1	July 1, 2025	Legal	Change in the name of the legal entity
	2	July 1, 2026	Legal	Changes to the monetary limits and processes, for giving and receiving business entertainment

DOCUMENT REVIEWER

NAME	DESIGNATION	DATE
Pradeep Ramnath	Vice President – Legal	July 1, 2026

DOCUMENT APPROVER

NAME	DESIGNATION	DATE
Anil Lale	Senior Vice President – Legal	July 1, 2026

NEXT REVIEW

REVIEW FREQUENCY	NEXT REVIEW DATE
Annual	December 31, 2026

DOCUMENT PRINTING



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GIFTS POLICY

1. PREAMBLE:

This policy intends to spell out the Company's stand with respect to giving & receiving gifts by employees in their official capacity in the course of business. Some key points are as follows:

- As a general principle, giving, offering or receiving of gifts is not allowed, especially when a real or perceived attempt is being made to influence an action in exchange for the gift or to do anything that is prohibited by the law, regulation or the Company.
- Permissible gifts, Exclusions & Exceptions to this policy & processes to be followed are laid down in this policy.
- Employees are advised to follow the policy in spirit & exercise reasonable judgement in exercise of this policy.
- All cases of non-compliance of this policy must be reported to Compliance Team or through the whistle blowing mechanism described under the Whistleblower Policy.
- Abuse of this policy will be viewed severely & strict action will be taken for violation /abuse of this policy.

2. APPLICABILITY: All employees of Jiostar India Private Limited ("**Company**") & its subsidiaries.

3. THIS POLICY IS NOT MEANT TO PROHIBIT THE FOLLOWING:

The Company from: (i) sponsoring shows, service or product launches, or other marketing or promotional events, and (ii) inviting business associates, guests, VIPs, celebrities, etc. to these occasions. But these events must be *bona fide* and reasonable promotional or marketing events that are customary in the industry. Invitations to these events must not be intended to comprise, or be perceived to comprise, a payment made in return for an improper business advantage.

4. WHAT IS A GIFT?

A "gift" is anything of value & includes cash and non-cash items or services which are given or received through direct or indirect means.

5. PROCESS TO BE FOLLOWED WHILE GIVING GIFTS:

- (a) You may give and offer gifts only on customary occasions (festivals, birthdays, anniversaries, etc) for the purpose of generally maintaining business courtesy/relationships. The gift must be upto a maximum limit of **Rs.5000/- (Rupees Five Thousand Only) per person**. Ideally, Company branded merchandise should be the preferred choice for giving gifts.
- (b) All gifts require the prior approval of the Business/Function head.
- (c) If gifts are over the monetary limit specified above, then prior approval must be obtained from the Compliance Team (after obtaining the approval of the Business/function head) and a copy of such

approval should also be sent to the appropriate Business/Function head.

- (d) The concerned Business/Function head should ensure that a list of receivers of gifts is maintained.
- (e) Business/Function heads should budget for & utilize only budgeted amounts for the purpose of giving gifts.
- (f) Original bills/receipts should be submitted to the Finance Department with the Purchase Requisition Form (and/or such other documents/ information as required by the Finance Department) with details of the nature of gifts, number of gifts procured, total cost of the gifts, list of receivers, and such other information as may be required by the Finance Department.

6. PROCESS TO BE FOLLOWED WHILE RECEIVING GIFTS:

- (a) Receiving of edibles & books is allowed upto reasonable limits.
- (b) Accepting gifts and promotional merchandise upto a perceived value of **Rs. 2000/- (Rupees Two Thousand Only)** is allowed. If the value is not ascertainable, you must take the permission of your Business /Function Head.
- (c) Accepting passes or invites to events/shows, etc., is permissible so long as it is in the ordinary course of business for the employee to receive such invitations. Any travel/lodging expenses incurred by the employee in order to attend such events/shows/etc. must be paid for by either the employee or Company (out of the team's budgets). However, if such expenses are proposed to be incurred by the host/ sponsor/ producer/ event organizer (as the case maybe), then the same have to be approved in advance, by the Compliance Team.
- (d) Other than the above, you must at all times decline any gifts being offered to you and return the gift to the sender with a polite written communication.
- (e) If the gift cannot be declined, you must surrender the gift to the central pool maintained by the Compliance Team. While surrendering a gift, an mail must be sent to the Compliance Team and an acknowledgement of the same must be obtained.
- (f) The Compliance Officer will maintain a register of the gifts in the central pool and provide an update to the Compliance Team. The Compliance Team will appropriately dispose the gifts available in the central pool.
- (g) Accepting alcohol in the form of a gift should generally be discouraged. Discourage giving or receiving any lavish or unreasonable gifts of any nature.

7. THE FOLLOWING ACTIONS ARE GENERALLY UNACCEPTABLE:

Giving, offering or receiving a gift when a real or perceived attempt is being made to:

- (a) Influence an action in favour of the Company in exchange of the gift;
- (b) Gain an unfair competitive advantage by influencing the employee's discretionary powers;
- (c) Encourage an employee to do anything that is prohibited by the law, regulation or the Company;
- (d) Accepting any gifts in the course of negotiations or tender. This includes contract amendments and dilution/waiver of Company rights.

BUSINESS ENTERTAINMENT POLICY

1. PREAMBLE:

This policy intends to spell out the Company's stand with respect to giving & receiving business entertainment by employees in their official capacity, in the course of business. Some key points are as follows:

- Business entertainment is permitted only for the attainment of business objectives. However, the business entertainment should be reasonable & the burden of proof shall lie on employee to explain the attainment of business objectives & ensure the reasonableness of the business entertainment.
- Permissible business entertainment, exclusions & exceptions to this policy, and the process to be followed, are all laid down in this policy.
- Employees are advised to follow this policy in letter and spirit, and exercise reasonable judgement in implementation of this policy.
- All cases of non-compliance of this must be reported the Compliance Team or through the whistle blowing mechanism described under the Whistleblower Policy.
- Abuse of this policy will be viewed severely & strict action will be taken for violation/abuse.

2. APPLICABILITY: All employees of JioStar India Private Limited ("**Company**") & its subsidiaries.

3. WHAT IS BUSINESS ENTERTAINMENT?

'Business entertainment' includes, but is not limited to meals, entertainment, alcohol, invitations to recreational events, hospitality, etc., provided the same is reasonable, and is for the purpose of attaining business objectives alone.

4. PROCESS TO BE FOLLOWED WHILE GIVING/INCURRING BUSINESS ENTERTAINMENT:

- (a) Business entertainment should not exceed the designation-wise, per person monetary limits as described under the JioStar Business Expense, Travel & Reimbursement Policy, as updated and/ or modified, from time to time.
- (b) All business entertainment given should be accurately recorded in the books of accounts of the Company.
- (c) All business entertainment given/ incurred upto the per person limit does not require any separate approval prior the same being given/ incurred, provided however, any claims submitted for the reimbursement of such expenses, shall be subject to the approval of only individual officers at the relevant level/ designation, as per the process and in the manner specified in the JioStar Business Expense, Travel & Reimbursement Policy, as updated and/ or modified, from time to time.
- (d) Original bills/receipts should be submitted to the Finance Department with the expense claim form along with details of the person(s) present, business reason/ justification for expense and the total costs incurred.
- (e) If business entertainment is over the limit specified above, approval of the officers at the relevant

level/ designation (as the case maybe), as specified in the JioStar Business Expense, Travel & Reimbursement Policy, as updated and/ or modified, from time to time, will be required to be obtained, and a copy of such approvals shall also be forwarded to the Compliance Team for records.

- (f) All payments & claims for business entertainment shall be made by the senior-most employee in attendance. Even in an exceptional situation, if payment has been made by a junior in the group, the senior-most employee must submit the claim.

5. PROCESS TO BE FOLLOWED WHILE RECEIVING BUSINESS ENTERTAINMENT

- (a) Business related meals and refreshments such as during business meetings, immediately after or prior to the business meeting, is permitted.
- (b) You can attend events/shows in relation to business, as long as travel or lodging expenses are not included. These expenses will be borne by either the employee, or by Company (in which case, the same will be incurred from such team's budgets). However, if such expenses are proposed to be incurred by the host/ sponsor/ event organizer (as the case maybe), then the same have to be approved in advance by the Compliance Team. Do not accept Business Entertainment which is lavish or unreasonable.
- (c) You cannot accept Business Entertainment that is in the nature of travel or lodging.
- (d) Business entertainment which is, lavish or unreasonable is discouraged under this policy.
- (e) Any exceptions or deviations to the above process regarding accepting Business Entertainment will require the approval of the Chief Executive Officer, and a copy of such approval has to be sent to the appropriate Business/Function head, and the Compliance Team.

6. THE FOLLOWING ACTIONS ARE GENERALLY UNACCEPTABLE:

To give or receive business entertainment when a real or perceived attempt is being made to encourage an employee to do anything that is prohibited by the law, regulation or the policies of the Company.

GENERAL NOTES TO THE GIFTS & BUSINESS ENTERTAINMENT POLICY:

- The above policies are based on current business needs. It is in no way directly or indirectly considered as employee entitlement.
- The Company reserves the right to amend / abolish the policies at any given point of time with or without prior notice/ intimation, based on business needs and requirements.
- The limits stated in the above policies are the upper cut-off limits and not an entitlement.
- Giving or receiving gifts and business entertainment shall at all times, be subject to the Code of Business Conduct and any conditions or restrictions described under any of the other organizational policies and processes, including without limitation, anti-bribery and corruption.
- For any clarifications/questions regarding the Gifts and Business Entertainment Policy, please write to the Compliance Team at orgcompliance@jiostar.com.
