GIFT POLICY

1. Objective

This policy provides guidance to employees ("Policy") regarding acceptance or giving of gifts or any anything of value, including but not limited to cash, favorable terms or discounts on any product or service, services, equipment, prizes, goods , use of vehicles, vacations or other facilities, including free transportation, boarding, or lodging , gift certificates, gift cards, discount cards or any charitable or political donations related to employee.

Any Gift to any immediate relative (defined below) shall be deemed as gifts received by the employees or representatives of ACER Credit Rating Private Limited ("ACER" or "Company"). ACER employees and representatives are responsible to ensure that his or her behaviour and actions, whether individual and collective, stay aligned to this policy.

2. Applicability

This Policy applies to all the Whole-Time Directors, Managing Director and CEO and employees (including off roll or contractual employees,) advisors, rating committee members and immediate relatives of such employees (collectively referred as "ACER Representatives").

However, Gifts given to or received by immediate relatives in their individual capacity or any other capacity and which have no direct or indirect relation with ACER, its business activities, shall remain outside the purview of the provisions of this policy.

For the purpose of this policy, an "Immediate relative" means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person.

No ACER Representative shall offer, give, solicit, or accept any gifts from clients, vendors, suppliers, or any other individuals or organizations, regardless of value, except as expressly permitted under this policy, whether on or off ACER's premises.

3. Prohibited Gifts:

ACER Representatives shall not directly or indirectly, offer, give, solicit, or accept the following Gifts:
a) Gifts that are intended to or influence a business decision or would result in favourable treatment, regardless of the value involved:

ACER Credit Rating Private Limited
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SEBI Reg. No.: IN/CRA/009/2025
Regd. Off.: Unit 808, 8th FLR, Sec-30, Signature Tower-B, Basai Road, Gurugram, Haryana, 122001
Regional Off.: Unit 1513-1514, C Wing, One BKC, Bandra Kurla Complex, Mumbai 400051
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b) Any gift received in the form of cash or cash equivalents.
c) Any gift that is extravagant or lavish in nature (generally exceeding INR 5000/-) in value)
d) Any gift that is concealed and not offered openly and transparently.
e) Any gift or entertainment that may create or appear to create a conflict of interest.
f) Any gift prohibited by law or known to violate ACER's policies.
g) Gift from an entity which is in default towards ACER, including but not limited to entities involved in litigation; fee non-payment (marketing employees only) of any value.
h) Tickets/ passes or invitations to highly sought after sporting events, including but not limited to, IPL/EPL or similar sought after entertainment / sports events or concerts.
i) Any travel or lodging expense related to a valid activity necessary to conduct ACER's business, such as an outside meeting, a speaking engagement, or an interview with the media, shall be paid for by ACER unless marketing team incorporates into the commercial agreement that the entity shall pay such expenses directly in lieu of reimbursing ACER's travel expenses.
ACER Representatives shall return non permissible to the giver along with a note of thanks.

4. Permissible Gifts

ACER Representatives may accept or give the following gifts, provided such Gifts are of nominal value (not exceeding INR 5000 per occasion subject to maximum 20,000 in a calendar year), customary in nature, and do not create any conflict of interest:

There is a culture of exchanging gifts on various occasions like festivals, new year, birthdays, marriage and anniversary. Accordingly, modest personal-occasion gifts, such as sweets, snacks, chocolate, dry fruits etc. may be given or accepted.
a) Branded promotional items such as pen, dairies and calendars and nominal desk gifts like clock, pen-stand, coaster may be accepted; subject to the value of the Gift not exceeding INR 5000/-
b) Any trophies, awards, mementos value not exceeding INR 10000/- received or given as a recognition of a professional contribution made by the recipient.
c) Business meals that are customary and reasonable in nature.
d) Travel and boarding and lodging expenses for professional contribution, made by the recipient as described in this policy may be accepted.
e) Promotional offers or discounts available to the public at large as part of their advertisement, promotional and marketing programs not related to Rating or other permissible services offered by ACER.
f) Employees may accept an invitation to a client's wedding. However, employees must not accept any gift offered during the event unless such gift is strictly in accordance with this Policy.

5. Reporting and Disclosure of Gifts

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In case of receipt of any Gift from any of the client or vendor/service provider, ACER Representatives shall inform the reporting manager and compliance officer about the Gift(s) along with the lump-sum value of the Gift(s) received and make entry in the Gift register maintained by the Company irrespective of the value of the Gift(s). ACER Representatives must notify the reporting manager and the compliance officer wherever required by this policy.

Employees must consult the Compliance Officer before accepting any gift if unsure about its appropriateness.

6. Return of Gift

If an employee or department receives a gift except one that is permitted under this policy, it should be returned to the sender immediately with due intimation to the Compliance Officer. If return is not feasible under the circumstances, the matter should be reported to the Compliance Officer for further action. If return of gift may cause undue embarrassment given local cultural values, the gift may be handed over to the Compliance Officer of the Company.

7. Disciplinary Action

Violations of the gift policy will be taken seriously and may result in disciplinary action including suspension or termination of employment.

8. Compliance

This comprehensive Gift Policy ensures that ACER maintains the highest standards of integrity, and transparency, in compliance with SEBI guidelines and IOSCO Code of Conduct. This policy will be periodically reviewed and updated to ensure compliance with SEBI, RBI, and the government of India guidelines and regulations.

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