

Gifts and Entertainment Policy

Purpose of this Policy

Business Gifts and Entertainment (for example, prizes, tickets, meals, etc) of reasonable value are commonly used as a mark of friendship, goodwill and to strengthen working relationships among business partners. Providing or accepting occasional meals, small company mementos and tickets to sporting and cultural events may be appropriate in certain circumstances. However, if offers of Gifts and Entertainment are frequent or of substantial value, they may create the appearance of, or an actual, conflict of interest or illicit payment (including a bribe).

Firstsource values its reputation for conducting business in an ethical and transparent manner. Firstsource has designed the Gifts and Entertainment policy to ensure compliance with Firstsource's ethical values and to.

1. Comply with the UK Bribery Act 2010 (UKBA) and the US Foreign Corrupt Practices Act 1977 (FCPA);
2. Help employees, vendors and business partners take the right decisions when providing or accepting Gifts and Entertainment while conducting business on behalf of Firstsource.

Any breach of this policy will be treated seriously by Firstsource and is likely to result in disciplinary action, which may even include the termination of employment of employees and the immediate termination of any vendor or business partner arrangements.

Policy coverage

All Firstsource employees, vendors and business partners must become familiar and comply with the Gifts and Entertainment Policy.

Guidance on Gifts and Entertainment

Gifts

As a general rule Gifts should never be requested or provided. However, Firstsource understands that in certain business scenarios, purely for social reasons (and not for obligatory or influencing reasons) there may be situations when accepting/offering gifts is unavoidable.

The following Gifts are never appropriate:

1. Gifts of cash, or cash equivalent (such as gift cards or gift certificates);
2. Gifts that are prohibited by law;
3. Gifts to Government officials;
4. Gifts that are prohibited by the gift giver's / recipient's organization;
5. Gifts that are accepted / given in return for something;

6. Gifts which are accepted / given as bribe / kickback in order to obtain / retain business, or to secure an improper advantage which could include by way of example, employment, statutory approvals, orders from customers, etc; and
7. Any Gift that is paid for in a personal capacity in order to avoid having to report it or seek relevant approval.

Entertainment

Entertainment may be accepted / provided for legitimate business purposes, such as building goodwill and enhancing relationships with customers, vendors and business partners.

The following types of Entertainment (whether being provided or received) are never appropriate:

1. Entertainment that can be viewed as excessive in the context of the business occasion;
2. Entertainment that is prohibited by law;
3. Entertainment to Government officials;
4. “Adult” entertainment or any sort of event involving nudity or lewd behavior;
5. Entertainment that is prohibited by giver / recipient’s organization; and
6. Entertainment that is otherwise prohibited by local management.

Gift & Entertainment Limits

Where Gifts and/or Entertainment are provided / received, the following limits apply:

Region	Currency	Amount per person per event	
		Gift	Entertainment
India	INR	1,000	10,000
UK	GBP	15	150
US	USD	25	250
Philippines	PHP	1,000	10,000
Sri Lanka	LKR	2,400	23,400
Republic of Ireland	EUR	20	200

Any Gifts and/or Entertainment in excess of the above limits will need prior approved by Firstsource management in the grade of Vice President and above.

While accepting or providing any gift or entertainment, ensure that:

1. This is infrequent in nature;
2. This does not create the appearance (either expressly or by implication) that the provider of gift or entertainment is entitled to preferential treatment, an award of business, better prices or improved terms of sale;
3. This would not embarrass Firstsource or the gift or entertainment giver / recipient if disclosed publicly;
4. It is made openly;
5. It is in good taste and occurs at a business appropriate venue;
6. It is reasonable and appropriate in the context of the business occasion; and
7. This does not violate any laws or regulation, or the standards of business conduct of the recipient's organization.

Dealing with Government Officials

It is never permissible to provide Gifts and/or Entertainment to Government Officials

Reporting concerns

Where you have concerns about a colleague and / or other agent or representative of Firstsource in connection with the giving or receiving of Gifts and Entertainment, these can be raised by sending an email to whistleblowing@firstsource.com. This facility is available to employees, vendors and business partners for raising their concerns. They can report concerns in confidence and without fear of retaliations. Firstsource prohibits retaliation against any complainant and there will be an appropriate penal action against such retaliation. All concerns raised are taken seriously and, where appropriate, investigated in detail.

The Gifts and Entertainment policy is continually evolving. This policy, neither can, nor intends to, encompass every situation. The document may undergo changes based on business requirements and changes in law and regulations.