

Gifts and Invitations Policy

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Issuer (Domain / Transversal team / OP / Region)	PE - Professional Ethics
Issuer team	PE – Professional Ethics

Functional domain	Compliance - Regulatory Compliance
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Key procedure	Yes

Level	1
Procedure type	Procedure
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Owner/Author name(s)	Compliance employee – Professional Ethics
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Higher level procedures	Group Gifts & Invitations procedure CG0067EN
Related procedures	India regulations as and when applicable

EXECUTIVE SUMMARY

1. The “Gifts and invitations” procedure is a critical component of the compliance device as regards fight against corruption. This procedure aims at making the **employees** aware of their own responsibilities in a field where non-compliant behaviours could expose the **employee** to legal and highly challenging reputational risks.

Offering gifts and invitations to holders of public function can only be considered for exceptional circumstances, and pre-approval is required

2. This procedure describes the conditions under which the received or offered gifts and invitations can be accepted, authorized or refused. It specifies the decision-making processes depending on the case.

Gift and Invitation are now subject to 2 separate but equal thresholds, as under:

In India:

- **GIFTS GIVEN** – the limit is cumulative value **INR 3,000** per natural person, per annum, per staff member.
- **GIFTS RECEIVED** – the limit is cumulative value **INR 3,000** per natural person, per annum per staff member.
- **INVITATION GIVEN** – the limit is cumulative value **INR 3,000** per natural person, per annum, per staff member
- **INVITATION RECEIVED** – the limit is cumulative value **INR 3,000** per natural person, per annum, per staff member

Provided that frequency of entertainment invitations: to comply with Group Policy of 4 times a year (i.e. over 4 times per person per year requires pre-approval)

3. When refusal may lead to a difficulty with the customers, solutions may be implemented in compliance with the rule of the “cross check” between the **entity's** hierarchy and compliance.

4. The procedure specifies the criteria to be considered to appreciate the reasonable character of the four great types of invitations (demonstrations, representation, interview of relation, leisure).

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1. SCOPE:

This Policy aims at making the employees aware of their own responsibilities in a field where non-compliant behaviour could expose the employee and / or the organization to legal and reputational risk.

This Policy applies to all full time, part time, contract and temporary staff of Sharekhan Ltd. and its Group Entities (“**Sharekhan**”) (hereinafter referred to as “**Staff**”).

During the course of conducting business, Staff may offer gifts and invitations to existing or prospective clients, counterparties, service providers, suppliers or other business relations of BNP Paribas group (collectively referred to as “**Clients**”).

On the other hand, Staff may receive gifts and invitations from Clients. This Policy describes the conditions under which the offer or receipt of gifts and invitations can be accepted, authorized or refused. It specifies the decision-making processes depending on the case.

This procedure is to be read in conjunction with the Group Compliance Gifts and Invitations Procedure and the Global Anti-Corruption Policy, as amended from time to time. Wherever the local requirements are more stringent, such local requirements shall prevail and wherever the Group or regional requirements are more stringent, the same shall prevail.

Specific Exclusions:

Where officials of government, regulatory authorities or public bodies of any jurisdictions are not involved, the following are outside the purview of this Policy:

- Coffee meetings with clients.
- BNP Paribas/Sharekhan standard corporate gifts.
- BNP Paribas/Sharekhan Corporate Events organised by Brand & Communications.
- Road Shows (and reverse Road Shows). [Already defined in para 2.2]
- Client Events, organized by a particular business line, which may involve the provision of meals. [Already defined in para 2.2] These should be business-related in nature and professional.

For quick and simple lunches (for e.g. sandwiches) without involving officials of government, regulatory authorities or public bodies of any jurisdictions, no pre-approval will be required. However, the details must be entered in the G&I register.

Specific Inclusions :

For avoidance of doubt:

- Festive gifts (e.g. hampers) received from clients are generally allowed provided that the gifts are not, in the reasonable sense, considered to be of excessive value. Staff members are encouraged to share such gifts with their team members. Any gift in excess of the reasonable amount has to be approved by the Business Head & Compliance Head.
- Gifts / Invitations offered to / received from officials of government, regulatory authorities or public bodies of any jurisdictions **will be covered** by this policy. Refer clause 3.27 for specificities related to State Owned Enterprises.

- Arrangement of gifts to other parties during BNP Paribas/Sharekhan Corporate Events, Road Shows and Client Events **will be covered** by this Policy, irrespective of whether Clients reimburse the said expenses or not (for e.g., offer of gifts on behalf of Clients to other parties during Road Shows, even when the relevant expenses will be reimbursed by Clients).

2. Definitions

2.1 Appointed Person

Appointed Person(s) refers to the person(s) responsible for maintaining / updating the G&I register.

2.2 BNP Paribas/Sharekhan Corporate Events, Road Shows and Client Events

BNP Paribas/Sharekhan Corporate Events are defined as events organised by Brand & Communications.

Road Shows (and reverse Road Shows) are series of meetings where a company has the opportunity to talk with current or potential investors.

Client Events, organized by a particular business line, such as conferences, seminars, corporate days, which may involve the provision of meals, should be business-related in nature and professional.

Please also see the section on Specific Inclusions above.

2.3 BNP Paribas/Sharekhan Corporate Gifts

Corporate gifts are standard gifts branded with a “BNP Paribas”/“Sharekhan” logo or with logo of any of its subsidiaries.

For the avoidance of doubt, BNP Paribas/Sharekhan standard corporate gifts are not covered by this Policy, except in relation to officials of government, regulatory authorities or public bodies of any jurisdictions.

2.4 Conflict of interest

As a general remark, the offering or receipt of gifts and invitations may be construed as causing a conflict of interest between the duties of our Staff or BNP Paribas and those of our Clients, their employees or other market practitioners. Our activities must always therefore be capable of withstanding public scrutiny.

Accordingly, Staff may not accept gifts from or provide gifts to any person unless it can be clearly demonstrated that no conflict of interest is created by doing so.

In addition, invitations provided by Staff to others must be within the Group’s expenses policy, must be appropriate in the context of the business relationship and must not contravene any applicable code of conduct that may govern the Clients’ dealings with third parties.

2.5 Family members and close relations

A family member or close relation is defined as such because of his or her ties to the Staff:

a) Family members

- non-separated spouse or the partner with whom the Staff tied;
- children over whom the Staff has parental authority, or with whom he usually or alternately lives, or over whom he has effective and permanent responsibility;
- any other person in his responsibility or who has lived in his home for more than one year.

b) Linked parties

A legal person whose natural person and/or close relations hold a percentage of the capital or voting rights or sufficient economic interests in order to directly or indirectly exercise control.

2.6 Gifts and invitations

2.6.1 The terms “gifts”, and “invitations” are to be understood in their broadest sense. They include benefits and favours of any kind, material or otherwise, having a monetary value or not or which may or may not create a conflict of interest or be construed as an inducement. The terms include gifts and invitations given or received.

2.6.2 A gift/invitation is said to be **reasonable** when its amount is not likely to compromise the beneficiary’s independence or judgment, to cast doubts on his integrity or to appear disproportionate compared with the business relationship in question.

2.6.3 Invitations may be broadly classified into 4 types:

2.6.3.1 Demonstration invitation – where the one who invites is to present to his guest about an installation, service or product

2.6.3.2 Invitation of representation – where the one who invites requests the guest to realize a statement on a precise subject corresponding to his scope of expertise

2.6.3.3 Entertainment invitation – relates to an invitation extended to maintain contact with a business relation in a less formal manner, typically business lunches

2.6.3.4 Invitation to leisure activities – relates to an invitation not belonging to the above three types. Such event is not essentially professional character (60-70% of time dedicated to leisure activities, cultural or sports events)

A single item could be considered as a gift or an invitation depending on the circumstances of the offering or receipt. For example:

- performance show tickets – if a staff is accompanying a client to a performance show, this arrangement would be considered as an Invitation to Leisure Activities. However, if staff is only giving out performance show tickets to a client without attending with them, such arrangement would be considered as a gift.
- air tickets and hotel accommodations – if air ticket and hotel accommodation are associated with a Demonstration Invitation, Invitation of Representation, BNP

Paribas/Sharekhan Corporate Events, Road Shows and Client Events, this arrangement would be considered as an invitation. Otherwise, the arrangement should be considered as a gift.

2.7 Professional link

The professional link between a Client or any counterparty whatsoever of an entity of BNP Paribas group and a Staff is established when this Staff has become acquainted with the Client in his professional capacity and this Client is or has been part of his customer base, regardless of the likely duration of the relationship.

2.8 Public bodies

Public bodies include the following:

- members of the legislative councils, judges, political parties and candidates;
- individuals (e.g. board of directors, staff) associated with state-owned enterprises that are at least 50% owned by government / state; and
- individuals and organizations that hold a public function, such as those:
 - having a role and responsibility to exercise any statutory power;
 - holding statutory power or duty in any jurisdictions; or
 - operating business are in public interest or providing public services.

2.9 Reasonable Amount

For the purpose of this Policy, the '**Reasonable Amount**' is **INR 3,000/- (Rupees three thousand only)** i.e. per individual recipient per calendar year for gifts given / received and **INR 3,000/- (Rupees three thousand only)** per individual recipient per calendar year for invitations given / received.

Provided that a frequency of entertainment invitations of over 4 times per individual recipient per calendar year requires pre-approval.

If there are multiple gifts / or invitations to the same individual recipient on the same day, then each instance will be treated as a separate gift / invitation (i.e. apply Decision Chart as per **Annexure I**)

2.10 Supplier

Any business or service provider associated with a process for the sale of goods or services to Sharekhan is hereinafter referred to as a "**Supplier**". The term Supplier includes the legal person as well as all natural persons representing or linked to the company or service provider.

3. Description

Guidelines for Gifts, Entertainments & Invitations

- 3.1** Never offer or receive Gifts or Entertainment which could be viewed as excessive in terms of frequency or value, or could create conflict of interest.

- 3.2** Gifts should be used solely for the purpose of fostering and promoting the business relationships of BNP Paribas Group with clients.
- 3.3** Never give to or receive from Clients or Suppliers any cash or cash equivalent Gifts.
- 3.4** Never solicit any Gift from a Client or Supplier.
- 3.5** Actively discourage clients from offering gifts or entertainment of any kind (including every type of benefit, favour, service, loan, fee or anything of monetary value).
- 3.6** Ensure primacy of the interests of the clients, market integrity and compliance with the prevailing legal and regulatory provisions.
- 3.7** Provide equal service to all clients without unduly favouring any specific clients. Avoid situations in which staff finds themselves indebted in exchange to a particular client and/or facing a potential conflict of interest.
- 3.8** Never offer a Gift or Invitation / accept a Gift or Invitation of any sort, either directly or indirectly, the value or frequency of which is disproportionate compared with the usual business relations.
- 3.9** It is forbidden for any Staff to offer at his/her own expense a Gift to a Client or Supplier.
- 3.10** Offering Gifts and invitations to holders of public functions can be considered only in exceptional circumstances and pre-approval is required. – **Refer Annexure I** for the Approval Requirements Decision Chart.
- 3.11** Entertainment and leisure invitations shall not be extended to the same natural person more than 4 times in a calendar year. Pre-clearance shall be obtained if this frequency is exceeded.
- 3.12** Checking of aggregate value of gifts and invitations: this will be counted on a per natural person recipient on an annual basis.
- 3.13** Do not unduly favour any specific Client or Supplier.
- 3.14** Be aware that some Clients may have taken internal measures stipulating a ban on their receiving Gifts.
- 3.15** Expenses must be justified by the commercial interest attached to the business relationships of BNP Paribas group with Clients or Suppliers.
- 3.16** Given their professional links, the following are not allowed for the benefit of Staff or for that of their family members or close relations:
 - 3.16.1** Any payment in cash or other means of payment, whatever the circumstances from a Client or Supplier;

- 3.16.2** Any personal mandate or power of attorney from a Client / any service to be provided outside the group's activity, in exchange for remuneration or free of charge;
 - 3.16.3** Any gift or benefit that, by virtue of its amount or its nature, can under no circumstances be considered as reasonable, such as the benefits from donation, bequests or life insurance policies;
 - 3.16.4** Any personal remuneration from a Client or Supplier for professional services;
 - 3.16.5** Gifts given to a family member or close relation of Staff, regardless of their monetary value even if they are of reasonable amount (except invitations to leisure activities);
 - 3.16.6** Gifts received directly at the place of residence.
- 3.17** Immediately inform your line manager if you or your family member or close relation receive a Gift or benefit from a Client or Supplier as detailed in 3.16 above.
- 3.18** The line manager must analyze the situation (in consultation with the Compliance Officer, if required) and assess whether the gift is acceptable.
- 3.19** Head of Business/Functions are responsible for ensuring that their Staff keeps within a reasonable amount of the entertainment invitations per client per year.
- 3.20** If the fact of accepting a gift under the reasonable amount is likely to place the Staff concerned in a situation of conflict of interest or affecting his/her independence of decision, such gift must be refused, declared to the Manager and Compliance Officer and recorded in the G&I register.
- 3.21** Staff must ensure that all records, receipts, accounts or other documents in relation to the company's business or affairs give a true representation of the facts, events or transactions as shown in the documents.
- 3.22** Intentional use of documents containing false or defective information to deceive or mislead, regardless of whether there is a gain or advantage involved, will constitute a breach of this policy.
- 3.23** **"At home" entertainment**
- 3.23.1** Staff's are prohibited from offering/ receiving any gifts directly at the Staff's residence or any place of residence.
 - 3.23.2** **It is forbidden for Staff to entertain Clients at the Staff's residence or any place of residence.** Approval may only be considered for **exceptional** circumstances. Pre-approval on such invitations must be obtained from both the relevant Head of Business/Function [or his/her designate(s)] and Country Head of Compliance. Please note that such invitations must be counted towards the annual reasonable amount threshold and frequency limit and must be recorded in the invitations register.

3.24 For reimbursement of the costs involved in the offering of gifts or invitations, please check the relevant procedures with Finance & Control. No staff may approve expenses incurred by *himself / herself* for gifts or invitations offered to his/her clients.

3.25 Internal meals for staff are not covered under this G&I policy. Please refer to the travel policy for the internal meal limits.

3.26 Overseas clients

When offering gifts and / or invitations to overseas clients (including corporate events or client events), due consideration must also be given to the requirements in the respective local jurisdiction by checking with BNPP compliance in that jurisdiction.

3.27 Entertainment invitations for State Owned Enterprises (“SOEs”)

3.27.2 Any invitations offered to/received from officials of government, regulatory authorities or public bodies of any jurisdictions must be pre-approved by the relevant Head of Business/Function [or his/her designate(s)] and Country Head of Compliance.

3.27.3 Requirement based on % ownership

3.27.2.1 For Indian companies

3.27.2.1.1 For entertainment invitation with Members of board of directors, chairman and CEO of SOEs that are at least 51% owned by government/state, pre-approval requirement applies.

3.27.2.1.2 For SOEs that are less than 51% owned by government/state, entertainment invitation within annual threshold and frequency limit will not be subject to pre-approval, except if the recipient is a government representative.

3.27.2.2 For offshore companies

3.27.2.2.1 For entertainment invitation with Members of board of directors, chairman and CEO of SOEs that are at least 50% owned by government/state, pre-approval requirement applies.

3.27.2.2.2 For SOEs that are less than 50% owned by government/state, entertainment invitation within annual threshold and frequency limit will not be subject to pre-approval, except if the recipient is a government representative.

3.28 Cash or cash equivalent gifts

Offering / receiving cash or cash equivalent gifts to / from Clients is prohibited under this Policy.

Supermarket / department store cash coupon is generally prohibited. Exceptions are only allowed subject to the following conditions:

- value of such coupons does not exceed the Reasonable Amount;
- offering / receiving such coupons is during Client's Annual Dinner lucky draw, marketing campaign or similar circumstances; and
- approval from Head of Business / Function [or his/her delegate] and Compliance are required.

These restrictions are aimed at avoiding a situation in which a Staff is exposed to any risk of compromising his impartiality and honesty by favouring one Client/Supplier over another, or by placing him in a situation involving a potential conflict of interest.

4. Regulations & Guidelines

Group guidelines as issued by the BNP Paribas Group should be followed.

5. Process Overview

5.1 Staff

- 5.1.1** To obtain approval for G&I expenses, where applicable
- 5.1.2** To submit details of All G&I Expenses all G&I received to the Appointed Person(s)
- 5.1.3** To inform the line manager when any G&I are received.

5.2 Business Head

- 5.2.1** To review and approve / reject requests for G&I expenses – Refer **Annexure I** for Approval Requirements Decision Chart.

5.3 Compliance

- 5.3.1** To approve / reject requests for all G&I expenses either considered to be not reasonable, or in excess of the annual frequency (for entertainment) or in excess of the reasonable amount, or G&I involving authorities or public bodies – Refer **Annexure I** for Approval Requirements Decision Chart.
- 5.3.2** To carry out a 2nd level of control of the G&I register on a quarterly basis.

5.4 Appointed Person

- 5.4.1** To maintain records of All G&I Expenses
- 5.4.2** To update the G&I register (please note that names and designations of client representatives must be entered in the column "Participants from client")

5.5 Chief Executive Officer

- 5.5.1** To approve / reject requests for all G&I expenses either considered to be not reasonable, or in excess of the annual frequency (for entertainment) or in excess of the reasonable amount or G&I involving authorities or public bodies – Refer **Annexure I** for Approval Requirements Decision Chart.
- 5.5.2** To analyze the expenses per client account.

5.6 Finance Team

- 5.6.1** Perform the reconciliation between the gift register and the finance records to ensure its accuracy and completeness
- 5.6.2** Follow up for reconciliation differences
- 5.6.3** Provide a report to COO on the reconciliation between gift register and finance records

6. Processes

6.1 Approval for Gifts and Invitations:

- 6.1.1** Responsibility: Staff / Business Head / Compliance Officer
- 6.1.2** Time Lines / Service Level Standard: For each instance
- 6.1.3** Tasks:
 - 6.1.3.1** The “Reasonable Amount” must be borne in mind at the time of seeking approval for Gifts & Invitations
 - 6.1.3.2** Pre-Approval by management and Compliance shall be obtained as per the Approval Requirements Decision Chart - refer **Annexure I**.
 - 6.1.3.3** Any approval should be requested by using the approval form duly completed. Refer to **Annexure II** - G&I Approval Form. It is important that all information including the client reference be provided to ensure a proper monitoring of expenses on a cumulative basis. The company / entity to which the concerned persons belong must be clearly mentioned.
 - 6.1.3.4** Copies of approvals sought via e-mail must be attached with the G&I approval form.
 - 6.1.3.5** Other supporting documents relating to the G&I expenses (where applicable) must be attached along with the expense claim.
 - 6.1.3.6** The line manager shall not approve the G&I expenses in Concur without having the form duly filled, where the amount exceeds the Reasonable Amount or where the gift is given to authorities.
 - 6.1.3.7** In exceptional cases, where there is difficulty to comply with the principles, consults the Compliance Officer, for e.g., in the following cases:
 - Gift in excess of the reasonable amount
 - Gift intended for a representative of public authority
 - Allocation of gifts, bequests, donations and life insurance
 - Invitations to leisure activities exceeding the reasonable amount
 - Invitations related to demonstration, representation or entertainment, exceeding the reasonable amount
 - 6.1.3.8** Compliance will take an independent decision, taking into account

- The principle of superiority of the interest of the client
- The risks linked to the image and reputation in connection with interpretation of the gift
- The consistency of the ratio between the gift, the situation of the one who receives it and his/her relationships with Sharekhan
- Internal rules and Professional Ethics

In case of difference of opinion between the local business and Sharekhan's Compliance Officer, the matter may be escalated to the Group Head - Compliance India, if necessary.

6.2 Record of All Gifts and Invitations Expenses:

6.2.1 Responsibility: Staff / Appointed Person

6.2.2 Time Lines / Service Level Standard: For each instance

6.2.3 Tasks:

6.2.3.1 All G&I expenses (no threshold) should be recorded, including those not requiring approval.

6.2.3.2 Prior to obtaining reimbursement, a copy of the completed approval form (or details of expenses in case no approval is required) must be sent to the Appointed Person.

6.2.3.3 All Client details such as complete name etc. must be provided.

6.2.3.4 The appointed person will then record all relevant details in the G&I Register. **Refer to Annexure III – G&I Register.**

6.3 Analysis of expenses per client account:

6.3.1 Responsibility: Chief Executive Officer

6.3.2 Time Lines / Service Level Standard: As and when required

6.3.3 Tasks:

6.3.3.1 It is the responsibility of Head of functions / geographies to ensure that the expenses made for a client are relevant to the business generated.

6.3.3.2 To that extent it is required that staff provides all details of the clients (name of company, reference, name of client representative) which will allow ad-hoc analysis to control that invitations are justified by the commercial interest and to detect excesses.

Note:

Gifts received are also subject to the G&I procedure: for all gifts received, staff must obtain approval from the Head of Business/Function if it is in excess of the reasonable amount, and irrespective of the amount, send the details to the Appointed Person to update the G&I Register.

7. Reference to APAC Guidelines on the treatment of Professional Ethics breaches

- 7.1** Compliance will follow the “BNP Paribas Asia Pacific Guidelines on the treatment for Professional Ethics Compliance Policies Breaches”, when dealing in any breaches of this G&I policy.
- 7.2** Severe breaches will be referred to Human Resources for consideration and may invite disciplinary action. Please consult with local Compliance if you have any questions on this G&I Policy.

8. Annexures

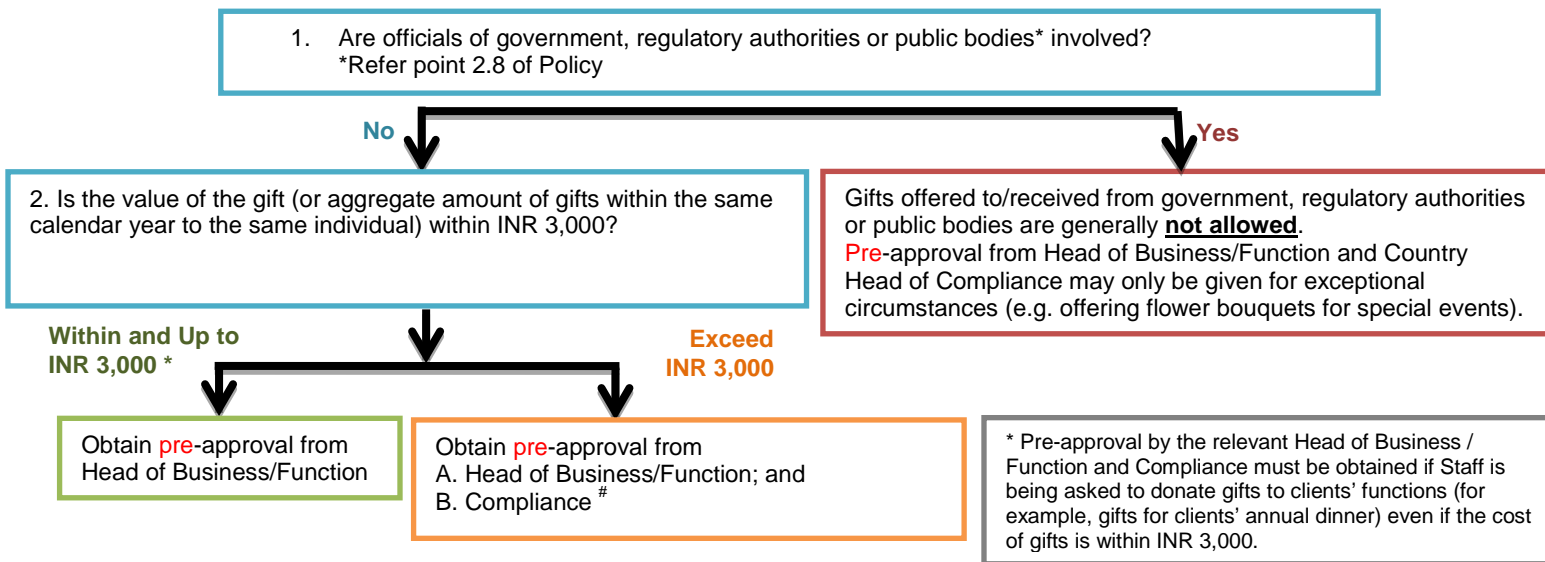
8.1 Annexure I – Approval Requirements Decision Chart

8.2 Annexure II – G&I Approval Form

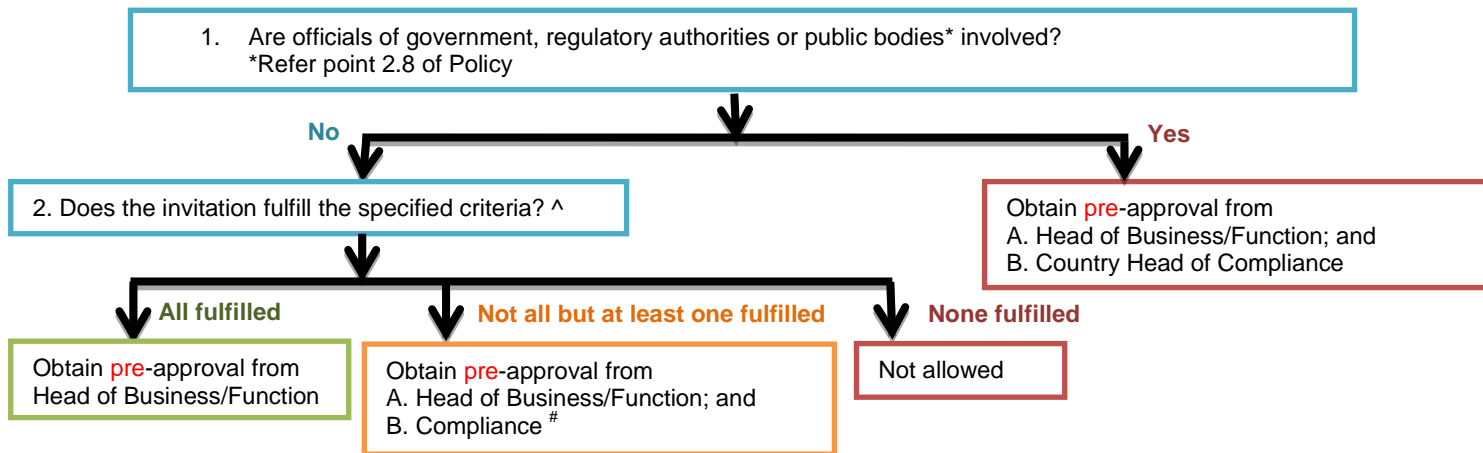
8.3 Annexure III – G&I Register

Approval Requirements Decision Chart for Gifts and Invitations

Gifts



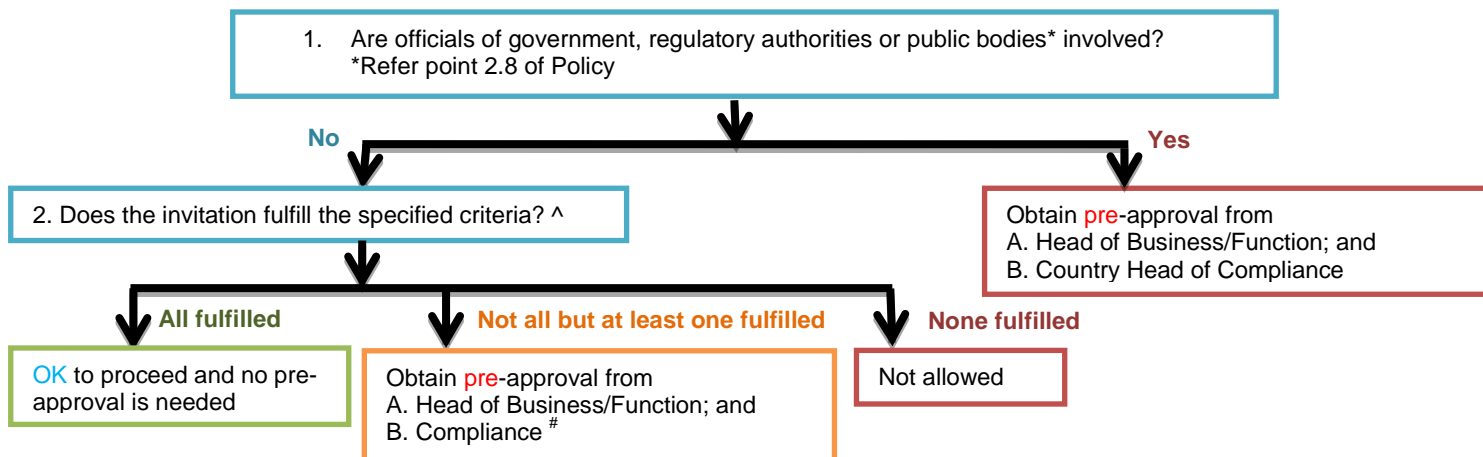
Invitations (for Demonstration and Representation invitations)



^ Criteria for invitations consideration

Demonstration	<ul style="list-style-type: none"> i. The program is mainly professional (at least 60% of the time) in nature; ii. Cost of the invitation having considered the commercial interest from the client should be justifiable; iii. Clients pay all of the transport and accommodation expenses (for offer), or Sharekhan/BNP Paribas pays all of the said expenses (for receipt); & iv. Aggregate cost of the invitation does not exceed INR 3,000 per individual within the same calendar year.
Representation	<ul style="list-style-type: none"> i. The program is mainly professional (at least 60% of the time) in nature; ii. Cost of the invitation having considered the commercial interest from the client should be justifiable; iii. No financial compensation should be paid to the guest speakers or received by the staff; & iv. Aggregate cost of the invitation does not exceed INR 3,000 per individual within the same calendar year.

Invitations (for Entertainment and Leisure invitations)



^ Criteria for invitations consideration	
Entertainment	i. Cost of the invitation having considered the commercial interest from the client should be justifiable; ii. Not too frequent to draw issues on bribery or conflicts of interest (4 times per calendar year is considered reasonable); iii. No participation from staff's relatives and friends; & iv. Aggregate cost of the invitation does not exceed INR 3,000 per individual within the same calendar year.
Leisure	i. Cost of the invitation having considered the commercial interest from the client should be justifiable; ii. Not too frequent to draw issues on bribery or conflicts of interest (4 times per calendar year is considered reasonable); iii. No participation from staff's relatives and friends; & iv. Aggregate cost of the invitation does not exceed INR 3,000 per individual within the same calendar year.

For meals and drinks:

Post approval may be sought in certain cases (for e.g., lunch with clients to continue unfinished business), provided that

- It is limited to unforeseen cases where pre-approval is not possible
- there is no involvement of holders of public function
- it is obtained within 30 calendar days of the event