



VENTIVE HOSPITALITY LIMITED

(Formerly known as “Ventive Hospitality Private Limited” and “ICC Realty (India) Private Limited”)

EQUAL OPPORTUNITY POLICY

Equal opportunity employer

- 1. We provide equal opportunities to all our employees and to all eligible applicants for employment in our company. We do not unfairly discriminate on any ground, including race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability or any other category protected by applicable law.*
- 2. When recruiting, developing and promoting our employees, our decisions will be based solely on performance, merit, competence and potential.*
- 3. We shall have fair, transparent and clear employee policies which promote diversity and equality, in accordance with applicable law and other provisions of this Code. These policies shall provide for clear terms of employment, training, development and performance management.*

Dignity and respect

Our leaders shall be responsible for creating a conducive work environment built on tolerance, understanding, mutual cooperation and respect for individual privacy.

Everyone in our work environment must be treated with dignity and respect. We do not tolerate any form of harassment, whether sexual, physical, verbal or psychological.

We have clear and fair disciplinary procedures, which necessarily include an employee’s right to be heard.

We respect our employees’ right to privacy. We have no concern with their conduct outside our work environment, unless such conduct impairs their work performance, creates conflicts of interest or adversely affects our reputation or business interests.”

STATEMENT

Ventive Hospitality is committed to providing equal opportunities in employment and creating an inclusive working environment.

It is our policy that there should be no discrimination, harassment or less favourable treatment of any employee or job applicant, either directly or indirectly, on the grounds of age, colour, disability, origin, religion, race, gender, family or marital status, gender re-assignment, disability, sexual orientation, pregnancy or maternity status.

It is our policy that there shall be no bullying or intimidation for any reason towards any employee or applicant.

OBJECTIVE

The objectives of this Equal Opportunity Employment Policy are to:

- A. provide equal and fair opportunities for employment to all qualified applicants;
- B. utilize effectively all human resources available to the Company and maintain a work environment free from harassment based on age, color, disability, marital or parental status, national origin, race, religion, sex, sexual orientation, gender identity or expression;
- C. make employment relationship decisions solely on the basis of individual ability and qualifications, subject only to occupational requirements, seniority and retirement policies, applicable union contract commitments, and other appropriate non-discriminatory criteria;
- D. provide and maintain equality of opportunity for self-development and advancement to all qualified employees; and
- E. carry out the Company's obligations, to adhere to all applicable laws pertaining to equal employment opportunities and fair employment practices.

SCOPE

This Policy is applicable to all employees of, applicants to, the Company.

This Equal Employment Opportunity Policy applies to all practices, terms and conditions of employment, including but not limited to: recruitment and hiring; position upgrade; promotion; transfer; on-the-job training programs; other training opportunities; wage and salary administration; employee benefits; maternity benefits; layoff or termination; and application of service, seniority, and retirement policies for all employees.

NON-DISCRIMINATION

- (i) Ventive Hospitality shall not discriminate directly or indirectly against any employee or job applicant on any grounds including on the grounds of religion, race, caste, colour, gender, sex, sexual orientation, place of birth, ancestry, ethnic origin, marital status, age, disability, or pregnancy or maternity status. Decisions of recruitment and promotion of employees shall be made objectively and based on performance, merit, competence and potential.

No recruitment or promotion shall be denied to a person on any of the above grounds. Ventive Hospitality shall not deny promotion to any employee on the grounds of pregnancy or maternity or any of the grounds described above.

- (ii) No employee shall face any reduction in rank if the employee acquires a disability during service. Ventive Hospitality shall endeavour to reskill the employee for another position at the same designation or higher if the employee is unable to perform the duties of the current position due to the disability.
- (iii) Notwithstanding any of the provisions of this Policy, no affirmative action policies or positive action measures taken by Ventive Hospitality to improve diversity in our workforce when recruiting and promoting candidates at all levels shall be construed as discriminatory.

BULLYING AND INTIMIDATION

Ventive Hospitality shall promote a harmonious working environment in which our employees will be treated with dignity and respect. We have a zero-tolerance policy towards bullying and harassment.

Bullying is offensive, intimidating, malicious, threatening or insulting behaviour, or an abuse or misuse of power which is meant to undermine, humiliate or injure the person at the receiving end.

Harassment is any unwanted conduct which has either the purpose of, or could reasonably be considered to have the effect of, violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person, even if that effect was not intended by the person responsible for the conduct.

Behaviour which may be considered to be "common-place", which was intended as a joke, or was not intended to be offensive, may still amount to harassment or bullying. Harassment may be deliberate or unconscious, open or covert, an isolated incident or a series of repeated actions.

COMMITMENT TO DIVERSITY AND INCLUSION

Create an equitable workforce through leading diversity and inclusion practices aligned to IHCL's business goals

IMPLEMENTATION

All company locations and hotels are required to create and maintain a climate that will permit the continuing and consistent application of this Policy among all categories of employees.

RESPONSIBILITY

Corporate Human Resources shall have the functional responsibility of assuring compliance with the policy; developing, coordinating and implementing all programs; and reporting findings and progress.