



VENTIVE HOSPITALITY LIMITED

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

Policy on Protection Against Victimization

1. Introduction

Ventive Hospitality Limited (herein referred to as the “Company”) is committed to fostering a work environment built on ethical behavior, respect, and transparency. To uphold this commitment, we have established a strict Protection Against Victimization Policy to safeguard individuals from any form of retaliation or adverse treatment. This policy provides a clear and effective framework to address grievances related to victimisation, ensuring that all concerns are handled fairly, transparently, and in a timely manner. The Company firmly believes that individuals should be able to raise concerns and participate in investigations without fear of retaliation or unjust consequences.

Objective

The primary objective of this policy is to protect all employees, contractors, and stakeholders from retaliation, harassment, or any form of adverse treatment resulting from raising legitimate grievances, reporting unethical conduct, or participating in investigations. The objectives can be summed up in the following,

- Ensure that individuals who report unethical conduct are protected from any form of retaliation.
- Create an open and transparent environment where issues of misconduct or unethical behavior can be raised without fear of retribution.
- Promote accountability and ethical business practices across all organisational levels.
- Align with global best practices and local laws, including but not limited to the Whistle Blowers Protection Act, 2014 (India) and international anti-retaliation standards such as those outlined by the UN Global Compact and OECD Guidelines.

Scope

This policy applies universally to all internal (employees) and external stakeholders (contractors, external parties) engaged with the Company, ensuring that everyone, regardless of role or location, is entitled to protection against any retaliatory actions. It covers all instances of victimisation, including retaliation or unfair treatment arising from the reporting of grievances, misconduct, or involvement in investigation processes, regardless of the role or level of the individuals involved.

2. Defined Terms

Terms	Description
The Company	Ventive Hospitality Limited
Victimisation	Any act or threat of adverse treatment directed towards an individual in response to their reporting of a grievance or involvement in an inquiry or complaint resolution process.
Complainant	Any individual who files a formal grievance or reports an incident of misconduct within the organisation.
Accused	The individual against whom allegations of misconduct or inappropriate behavior have been made.
Grievance Committee	The designated body within the Company responsible for investigating grievances and ensuring that appropriate resolutions are reached, especially in cases of alleged victimisation.

3. Responsibility

- Human Resources Department: Tasked with ensuring effective implementation of this policy, promoting awareness, and safeguarding employees' rights against victimisation.
- Grievance Committee: Responsible for investigating complaints fairly and impartially, ensuring compliance with this policy, and recommending corrective actions when necessary.
- Supervisors/Managers: Supervisors and managers must ensure no retaliatory actions are taken against employees who raise concerns or participate in grievance resolution processes.

4. Protection Measures

- Non-Retaliation: No individual who reports in good faith will face retaliation, discrimination, harassment, or any adverse action based on their report or participation in an investigation.

- Confidentiality: Information shared during the reporting process will be handled with confidentiality to protect the identity and interests of the individual reporting the concern.
- Support Mechanisms: The Company will provide adequate support to individuals who may be affected by victimisation, including access to counselling or mediation services if necessary.

5. Guidelines

During the Complaint Process

- If the Accused is the direct supervisor or superior of the Complainant, the Company will explore alternatives such as relocating the Complainant or modifying reporting lines to prevent oversight by the Accused during the complaint process.
- Any form of retaliation, whether direct or indirect, against the Complainant or any witnesses involved, is strictly prohibited. Reprisals, including interference or coercion by the Accused, will lead to disciplinary actions as determined by the Grievance Committee, in consultation with management.
- In cases where the Accused is an external party interacting with the company, access to the Company premises will be limited to the extent necessary for resolving the complaint.

Post-Investigation Measures

- If the Accused is found guilty of misconduct, they will be prohibited from performing duties such as appraising the Complainant's performance, to prevent potential conflicts of interest.
- In instances where the Accused is an external party, their access to the Company premises will be terminated, and the business relationship may be reviewed or severed.

False Complaints

- If the Grievance Committee determines that a complaint was made in bad faith or with malicious intent, disciplinary actions will be taken against the Complainant, as deemed appropriate in consultation with management.

6. Accountability and Consequences

The Company holds a zero-tolerance stance towards any form of retaliation or victimisation against individuals who report misconduct or participate in investigations. Any person found to have engaged in retaliatory actions will be subject to strict disciplinary measures. These may include suspension, termination, or legal action, depending on the nature and severity of the violation. In addition to internal consequences, the company will also ensure that these violations are subject to external scrutiny to maintain the highest level of accountability.

The protection of individuals who raise concerns is paramount, and any retaliatory behaviour undermines the trust, integrity, and ethical values that the Company upholds. Therefore, the company commits to ensuring that every reported incident of retaliation is thoroughly investigated and appropriately addressed.

7. Compliance

The Company is fully committed to adhering to all applicable local, national, and international laws that safeguard individuals against victimisation. This policy is aligned with India's Whistle Blowers Protection Act, 2014, which protects individuals from retaliation when reporting instances of misconduct or corruption. The Company also complies with the Prevention of Corruption Act, 1988, which prohibits bribery and corruption in both public and private sectors, and the Prevention of Sexual Harassment (POSH) Act, 2013, which provides a framework for addressing and preventing sexual harassment at the workplace.

In addition to these domestic regulations, the Company recognises the importance of global standards and frameworks. The company is committed to upholding international best practices such as the OECD Anti-Bribery Convention, which promotes transparency and the prevention of corruption in global business operations, and the International Labour Organisation (ILO) standards, which focus on promoting fair and ethical labour practices worldwide.

8. Training and Awareness

The Company is committed to ensuring that all employees, contractors, and relevant stakeholders are aware of their rights and responsibilities under this policy. To achieve this, regular training sessions will be conducted to inform all individuals about the provisions of the Protection Against Victimisation Policy, the processes for reporting grievances, and the mechanisms in place to protect against retaliation.

Training will include:

- Policy Orientation: Introduction to the protection against victimisation, with clear explanations of the scope and expectations.
- Reporting Mechanisms: Guidance on how to safely report concerns of victimisation, including the available channels for confidential reporting.
- Support Systems: Information about the support available to individuals who may be affected by retaliation or victimisation.
- Ethical Conduct: Reinforcement of the company's commitment to maintaining an ethical and respectful work environment.

This training will be provided to all new employees during onboarding, and regular refresher sessions will be scheduled annually or as required. Additionally, specialised sessions may be

conducted for managers and HR personnel to ensure they understand their specific roles in handling reports of victimisation.

9. Monitoring and Review

The Company recognises the importance of ensuring the Protection Against Victimisation Policy remains effective and aligned with best practices. The company will regularly monitor the implementation of this policy and evaluate its effectiveness in protecting individuals from retaliation.

- **Internal Audits:** Periodic audits will be conducted to assess the effectiveness of the policy and the functioning of the reporting mechanisms. These audits will include an evaluation of the number of reported cases, the outcomes of investigations, and any corrective actions taken.
- **Stakeholder Feedback:** Feedback from employees, contractors, and stakeholders will be collected through surveys or focus groups to gauge the overall effectiveness of the policy and any areas for improvement.
- **Policy Review:** This policy will be reviewed at least annually or whenever significant changes in legal requirements, organisational structure, or business operations occur. Updates to the policy will be made in consultation with legal and compliance teams, ensuring alignment with both local laws and international best practices.
- **Key Performance Indicators (KPIs):** Metrics such as the number of reported victimisation cases, the time taken to resolve complaints, and employee satisfaction with the reporting process will be tracked and used to gauge the policy's success.

10. Communication of the Policy

Effective communication of the Protection Against Victimisation Policy is critical to ensure that all stakeholders are aware of their rights and the procedures for reporting victimisation. The Company is committed to making this policy accessible and transparent to everyone involved with the organisation.

- **Internal Communication:** The policy will be communicated to all employees through multiple channels, including email, internal portals, and during onboarding sessions. Employees will also be reminded of the policy during annual training sessions, ensuring they remain aware of the reporting mechanisms and protections in place.
- **External Stakeholders:** For contractors, third-party vendors, and business partners, the policy will be communicated through formal agreements, supplier onboarding processes, and relevant communication platforms to ensure they understand their rights under the policy.
- **Accessibility:** Copies of the policy will be made available on the company's intranet, external website, and other easily accessible platforms to ensure that all employees and stakeholders have continuous access to it.

- Ongoing Awareness: The Company will engage in periodic awareness campaigns, including posters, newsletters, and intranet updates, to ensure ongoing awareness of the policy, particularly in cases of policy revisions or legal changes that may affect its implementation.

11. Grievance Redressal Mechanism

Individuals who believe they have been subjected to victimisation after reporting a grievance or participating in an investigation are encouraged to report their concerns to the Grievance Committee. Complaints can be submitted via the designated email or through the company's grievance hotline. The Grievance Committee will thoroughly investigate all complaints and take appropriate actions in accordance with this policy.