



VENTIVE
HOSPITALITY

Human Rights Policy

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1. Introduction

Human rights, also defined as universal rights, are inherent to all of us, regardless of nationality, ethnicity, religion, or any other status. These Human rights are an indispensable part of the hotel industry. Recognizing the risk of adverse impacts on human rights and mitigating them has become a fundamental corporate responsibility.

VENTIVE HOSPITALITY Limited as one of the World's strongest hospitality brands across globe and a business leader in the industry recognizes it's role in protection of human rights. We are also an integral part of the Panchshil Group representing the hospitality arm of the group.

As part of a foremost value-based corporation, we are guided by our groups code, Panchshil's Code of Conduct, which is a bedrock on which we base our commitment to our stakeholders. Driven by our group values and core VENTIVE HOSPITALITY values of Trust, Awareness and Joy, we are committed to respect, protect, and promote human rights where we operate including our value chain, employee and workers base and local communities.

This Human Rights Policy serves as a common set of principles to protect and uphold the human rights and manage human rights violations across the Company. As an overarching policy for human rights, the principles of human rights are integrated into various organizational policies. The same should be interpreted in conjunction with our other standalone and group-level policies relevant to human rights.

Our Human Rights Policy is guided by international human rights instruments, such as the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights and National Guidelines on Responsible Business Conduct (NGRBC).

2. Scope and Applicability

This policy is applicable to all employees and our business activities under our direct control.

This policy acts as an advisory to our business partners, including suppliers, vendors, contractors, consultants, customers, distributors, and those representing our Company, to adhere and adopt the principles enshrined in this policy and commit to protect the spirit and intent of our Human Rights Policy.

3. Definitions

- a. **“Child labour”** means any work that is mentally, physically, socially or morally dangerous and harmful and interferes with the schooling/education of any child who is below 18 years of age, or the minimum age as defined by the local authority whichever is minimum.
- b. **“Company”** means Ventive Hospitality Limited
- c. **“Forced labour”** means all work or service which is exacted from any person under the threat of any penalty and for which the said person has not offered himself voluntarily.

- d. **“Harassment”** means any unwanted behaviour, patterns of behaviour, or incidents that are intrusive or persistent and that violate a person's dignity, well-being, or an individual's right to a respectful environment at work. Harassment also includes committing any of the following acts:
- physical contact and advances involving unwelcome and explicit sexual overtures; or
 - a demand or request for sexual favours; or
 - showing pornography against the will of a woman; or
 - making sexually coloured remarks
- e. **“Retaliation”** means any adverse actions taken by an employer or any other parties against an employee or worker in response to the individual's exercise of their legal rights or reporting of wrongdoing.

4. Policy Statement

Child Labour and Forced Labour

- The Company is committed to implement ethical labour practices across all its operations and has zero tolerance towards and prohibits engagement of Child Labour and Forced Labour within our operations.
- We strictly adhere to regulations on labour which includes child labour (Child Labour (Prohibition & Regulation) Act, 1986) and forced labour (Bonded Labour System (Abolition) Act 1976)
- We also respect the fundamental right of all workers to enter and exit employment voluntarily, and we categorically denounce any form of compulsory, forced, indentured, or bonded labour within our workforce.
- The Company prohibits associated vendors, contractors, suppliers, consultants, customers, distributors, and those representing us from engaging child and/or forced labour.

Diversity, Equal Opportunity, and Non-Discrimination

- The Company is firmly committed to maintaining a working environment that is inclusive and free from any form of bias or prejudice
- The Company ensures that all employees and workers are treated with the highest standards of dignity, respect, and fairness, regardless of their gender identity, sexual orientation, race, religion, caste, ethnicity, nationality, age, physical or mental disability, HIV status, marital or domestic partnership status, education background or any other socio-economic status free from discrimination in any form. Please refer to our [Equal Opportunity Policy](#) for more details about our inclusive working environment.
- Sexual Harassment: The Company has a strict zero-tolerance policy when it comes to sexual harassment. In the event of any reported incidents, we shall conduct thorough and impartial investigations, providing all parties involved with an opportunity to present their perspectives. If guilt is established, we shall take swift and appropriate action in accordance with our internal policies. Our overarching objective is to cultivate a workplace that is not only safe but also respectful for all. Please refer to the [POSH policy](#) implemented by the Company for more details on prevention of sexual harassment.

Freedom of Association and Collective Bargaining

- The Company recognizes the rights of its workers for collective bargaining as per applicable local laws/regulations/ guidelines.
- Workers/employees are free to exercise their right of freedom of association and collective bargaining without any fear of harassment or intimidation, provided such activities do not create an actual or potential conflict with the interests of our company.
- The Company strive to resolve any conflict with the workers by facilitating dialogues and consultations between the employee/worker representatives and group management in adherence to the company policies and procedures.

Environmental Health and Safety

- The Company is committed to provide and maintain a safe, healthy workplace of all stakeholders by adhering to established management systems and safety protocols.
- We ensure environmentally responsible practices and continuous ESG performance improvement through rigorous incident tracking & investigations, and comprehensive safety training for employees and contractors. For more details on our environmental practices please refer to our [Sustainability Policy](#)

Labour and Compensation

- We are committed to ensure fair compensation to our workers relevant to our industry and local labour markets by complying with the applicable labour laws on wages, working hours, leaves, overtime and other worker compensation and benefits where we are operational.

Recruitment and Benefits

- The Company is committed to ensure transparency in its recruitment, compensation, and promotion processes to retain talent and maintain employee motivation.
- The Company prohibit any fraudulent recruitment methods and ensures that all terms and conditions of employment and benefits of employment such as Maternity leaves, Provident fund etc are clearly communicated to our employees during onboarding.

Employees skill upgradation and career development

- To comprehensively pursue Declaration on the Right to Development, as adopted by General Assembly resolution 41/128 of 4 December 1986 of United Nations, and also in furtherance to its own talent management for professional pursuits, the Company provides equal opportunities to its workforce for various learning and development programs that are relevant to their role in the organization without differentiation on grounds of gender, age, or physical abilities. The programs focus on specific domain areas along with providing learning offerings and interventions. These include training on technical skills, managerial capabilities, process skills, industry-specific knowledge, and leadership development for employees.

Stakeholder Engagement

- The Company is firmly committed to engaging with its stakeholders with respect for their rights and dignity.
- The Company proactively work with its stakeholders to prevent and mitigate any adverse impacts from its operations. The Company strive to implement capacity-building initiatives, provide training, resources, and support to enhance stakeholders' understanding of their rights.

- The Company ensures that various communication channels, including social media, community events, and public forums, are utilized to foster a broader understanding of human rights issues and the importance of the policy's implementation. This steadfast commitment reflects our dedication to building enduring, sustainable relationships with our stakeholders. Please refer to our [Stakeholder Engagement Policy](#) for more details.

Safe Working Environment

- The Company is focused on monitoring and promoting awareness on the safety of its employees.
- The Company ensures to maintain a safe work environment that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats.
- The Company ensures that adequate security arrangements for employees are provided, as needed, in accordance with the guidelines on Security and Human Rights.

Right to Privacy

- The Company is dedicated to fostering a culture of privacy across the entire organization to safeguard the rights and privacy of its stakeholders.
- The Company strive to establish high standards to protect the privacy rights during the transfer and processing of personal data. The Company has implemented [Privacy Policy](#) which ensure the protection of data of its customers and stakeholders in alignment with relevant regulations.
- The Company does not disclose personal information/data to third parties, without consent of its stakeholders, unless required by law/Statutory Authorities etc., to do so.

5. Governance and implementation

Responsibility

The implementation of the Human Rights Policy, and all its tenets, is the responsibility of the Head of Human Resources. We have ethics committees and HR heads in our hotels to whom individuals can directly report issues, and we provide drop boxes for submitting concerns. We have a whistleblower mechanism in place to handle complaints. Please refer to the [Whistle blower Policy](#) for more details.

Furthermore, it is the responsibility of all employees, with designated personnel to adhere to the mentioned policy components. The designated personnel shall oversee its adherence and effectiveness. This includes proactive education, incident handling, and ongoing assessment to ensure our commitment to human rights are upheld at all levels of our organization.

6. Grievance Redressal Mechanism

Procedure

Appropriate systems and mechanisms with time bound process for redressal, such as Grievance Management System is in place to allow for resolution of the issues raised under this policy.

The Company strives to conduct impartial investigations, addressing any conflicts of interest that may arise during the process. Following the investigation, it shall communicate the disciplinary actions and remediation measures taken. The Company is committed to completing the redressal process within reasonable timelines and ensuring ongoing communication to the relevant employees regarding the progress.

If the issue is not resolved through the committee's efforts, applicants have the option to seek resolution through relevant legal authorities.

Grievance Redressal

The Company maintains a comprehensive grievance redressal mechanism designed to enable all stakeholders to raise concerns regarding potential human rights violations.

Compliance and Monitoring

To uphold the integrity of its Human Rights Policy, Ventive Hospitality has established robust mechanisms to ensure adherence, protect vulnerable stakeholders, and foster a culture of dignity and respect.

Designation of a Human Rights Compliance Committee

Ventive Hospitality has appointed a dedicated Human Rights Compliance Committee which is responsible for:

- Overseeing the implementation of human rights standards across all properties and corporate offices.
- Ensuring alignment with national labour laws and international frameworks (such as the UN Guiding Principles on Business and Human Rights).
- Reviewing grievance reports related to labour practices, discrimination, or harassment.

Regular Audits and Impact Assessments

Ventive Hospitality conducts recurring social audits and human rights impact assessments (HRIA) to identify, prevent, and mitigate adverse impacts in its operations and supply chain.

- **Labour Practice Reviews:** Regular inspection of payroll, working hours, and employment contracts to ensure compliance with fair wage and "no forced labour" mandates.
- **Safe Work Environment Scrutiny:** Periodic health and safety audits to ensure the physical and mental well-being of all associates and contractors.
- **Supply Chain Due Diligence:** Evaluation of high-risk vendors and contractors to ensure they adhere to Ventive's prohibition of child labour and unethical recruitment practices.
- **Frequency:** Comprehensive audits are conducted on an **annual basis**, with internal self-assessments performed **semi-annually** at each hospitality unit.

Internal Controls and Monitoring Mechanisms

Ventive Hospitality has implemented a comprehensive framework of internal controls designed to monitor real-time compliance and detect potential human rights violations.

- **Grievance Redressal Mechanism:** A secure, confidential whistleblowing channel available to employees, guests, and vendors to report human rights concerns without fear of retaliation.
- **Zero-Tolerance Protocol:** Clear disciplinary frameworks for violations related to discrimination, harassment, or non-compliance with statutory labour requirements.
- **Stakeholder Engagement:** Active monitoring of employee engagement surveys and community feedback to identify emerging social risks or areas for policy improvement.
- **Documentation:** Maintenance of transparent records regarding recruitment, diversity metrics, and training completion rates for human rights sensitisation.

Remediation and Grievance Redressal

Ventive Hospitality is committed to correcting any adverse human rights impacts it causes or contributes to. We recognise that a policy is only as effective as the mechanism available to those it protects.

Accessible Grievance Channels

We provide multiple, confidential channels for employees, contract workers, guests, and local communities to report concerns regarding human rights violations, including:

- **Dedicated Email ID:** A dedicated email ID (hr@ventivehospitality.com) and web portal (<https://www.ventivehospitality.com/grievance/>) for reporting.
- **Open-Door Policy:** Encouraging direct communication with HR or the Compliance Officer at each property level for immediate resolution of localised issues.

The Remediation Process

When a human rights violation is identified or reported, Ventive Hospitality follows a structured remediation protocol:

1. **Immediate Cessation:** The activity causing the harm is suspended while an investigation is conducted.
2. **Investigation & Verification:** The Human Rights Compliance Committee conducts a neutral, time-bound investigation to determine the scale and impact of the violation.
3. **Corrective Action:** Implementation of measures to "make good" the situation, which may include financial compensation, public apologies, reinstatement of roles, or medical support.
4. **Root Cause Analysis:** Updating internal controls or training programs to prevent a recurrence of the specific violation.

Protection Against Retaliation

Ventive Hospitality maintains a strict Non-Retaliation Policy. Any attempt by management or peers to penalize, intimidate, or discriminate against an individual for reporting a genuine concern in good faith will result in immediate disciplinary action, up to and including termination of employment or contract.

Transparency and Communication

- **Feedback Loop:** Complainants will be kept informed of the progress and outcome of their grievance within a defined timeframe.
- **Public Reporting:** Anonymized summaries of grievances handled and remediation steps taken will be included in our annual ESG/Sustainability disclosures to ensure stakeholder trust.

7. Confidentiality and Anti Retaliation

The Company strive to ensure confidentiality in case of any issue or concern raised by maintaining anonymity of the complainant. The reports can be made through our ethics hotline as above.

The Company uphold a strict policy of zero tolerance for any form of retaliation. We do not accept, endorse, or condone retaliation against any Employee who, in good faith, reports suspected misconduct, asks questions, or expresses concerns. Any individual found engaging in such retaliation,

whether directly or indirectly, or encouraging others to do so, may face appropriate disciplinary consequences. We shall treat retaliation cases with the same level of seriousness as alleged policy violations. Anyone who suspects or experiences retaliation should promptly report it to the relevant authorities.

8. Risk assessment and Due Diligence

Our contractual agreements have a mandatory compliance towards the human rights issues, and we reserve the right to assess all our operational sites for Human Right risks and conduct human rights due diligence at any or all the value chain partners where such risks are identified.

These risk assessments and due diligence helps us to identify, report and mitigate human rights issues that can impact our business operations.

9. Communication

The Company require all its stakeholders to adhere to its Human Rights Policy. We strive to ensure that Human rights training is provided to all our employees. Such training will include Human rights aspects such as identification and reporting of any Human Rights violations, including discrimination and harassment (both sexual and non-sexual), awareness on diversity, gender equality, awareness on employee benefits and rights etc.

In our commitment to transparency and compliance, our policy is publicly accessible on our portal for reference by all stakeholders.

10. Review and Updates

- This policy will undergo periodic reviews to ensure its continued relevance and shall be updated as and when needed.
- The Company has the power to clarify any doubts or rectify any anomalies that may exist in connection with the effective execution of this Policy and reserves the right to amend this Policy based on changing legal requirements.

This Policy was approved by the Finance & Operational Committee at its meeting held on 11th February 2026 w.e.f 11th February 2026.