

Equal Opportunity in Employment and Employment Practices Policy

1. Introduction and Objective

This policy shall be read in conjunction with “Positive Work Environment Policy”. The Leela Palaces, Hotels & Resorts hereinafter referred to as “The Leela or Company or Organization” (includes Schloss Group of Hotels (owned properties), and The Leela managed and franchised hotels / properties including the Corporate and Regional sales offices) is committed to providing equal opportunities in its employment opportunities or practices to all employees without any discrimination or harassment based on religion, race, caste, gender (including gender reassignment), color, gender identity, sexual orientation, national origin, age, marital status, pregnancy status, disability, or any other protected categories by the provisions of any law that is applicable to the Organization or its associates or subsidiaries.

In the recent years, the Government of India has enacted an important Act viz. “The Rights of Persons with Disabilities Act, 2016 & Rules thereunder”. The principle objective of the enactment of the said Act is to have inclusive employment opportunities for persons with disabilities.

This policy is formulated considering the requirements contained in the “The Right of Person with Disabilities Act, 2016 & the Rules thereunder” (referred together as “the Act”). In alignment with the provisions contained in the Act, the organization aims to achieve the objective of equality of opportunity and non-discrimination to all its stakeholders in the employment opportunity with the organization & employment practices observed by the organization by implementing this policy. In case of any clause of this policy is in contravention to the provisions of these Act, the provisions of the Act shall prevail.

2. Applicability

This Policy is applicable to all the employees of the organization (including affiliates, subsidiaries and associates operating under “The Leela” brand) working across locations and offices In India. This policy also covers job applicants, interns, trainees and contractual staff from any form of discrimination in employment opportunities and practices of the Organization.

3. Definitions

In this Policy, unless the context otherwise requires: -

- a. **“The Acts”** - In this policy any mention of the Act or Acts would have the reference to “The Rights of persons with Disabilities Act, 2016 & Rules thereunder” or any other legislation as relevant to the subject matter contained I this policy.
- b. **“Complainant or Aggrieved Person”** Means any person who has raised a grievance as per clause 3 (f) of this policy.

“Designed officers/ Liaison Officers” Means the officers who are responsible to receive any grievance under the provisions of this policy.

- c. **“Discrimination”** – For this policy, Practices of less favorable treatment to person in employment opportunities and practices due to stereotypes, prejudice or misconception based on religion, race, caste, gender, (including gender reassignment), color, sexual orientation, national origin, age, material Status, pregnancy status disability, or any other characteristic protected by applicable Indian Law shall be considered as the discrimination.
- d. **“Employee”** means a person employed at a workspace for any work on permanent temporary, adhoc or daily basis either directly by the Organization or through a service provider and includes boards members of the Organization, any co-employee, an employee of services provider, probationer, trainee, apprentice, intern or called by any other name under any statutory or internal scheme or the Organization, whether employed on remuneration or on voluntary basis.
- e. **“Grievance”** means any complaint or concern pertaining to employment or any other employment related discrimination raised to the designated authorities of the Organization by the Complainant under the terms of the policy.
- f. **“Stakeholders”** means any person or Organization, or entity having business relations with the organization and includes employees and job applicants.
- g. **“Person with disability”** Due to the exclusive nature of “The rights of Persons with Disabilities Act, 2016, all the definition of person with disability such as “person with benchmark disability”, “person with disability”, “person with disability having high support needs” are adopted from the Act for the purpose of this policy.
- h. **“Reasonable accommodation”** means necessary and appropriate modification and adjustments without imposing a disproportionate or undue burden in a particular case, to ensure support to persons with disabilities or diseases. The same shall be made on a case-to-case basis and would be within the discretion of the Organization.
- i. **“Support”** means an intensive support, physical, psychological, and otherwise, which may be required by a person with disability or certain disease for daily activities, to take independent and informed decision to access facilities and participating in all areas of employment opportunities in the Organization.

4. **Employment Practices / Opportunities**

In strict alignment with the provisions and principles contained in the Acts, the Organization is committed to and shall strive to create and enforce equal opportunities in all the following areas that are observed or practiced by the Organization. The list is indicative, and the Organization may contain any other relevant process followed in the Organization or adopted by the Organization in the future. In all the following practices that are provided herewith, the Organization shall always be mindful about ensuring “reasonable accommodations” and “Support” for the person with disability.

- a. **Hiring Process** – The Organization shall not make any discrimination of any person in the hiring process in order to fill the vacancies that are available with the Organization. The entire hiring process will be based on the fitment & merit of the prospective candidate. The Organization shall always endeavour to make reasonable accommodation for the persons with disability in the available opportunities.
- b. **Creation of an enabling working environment** – By providing necessary support and ensuring reasonable accommodation that shall empower the Person with disability.
- c. **Equality to pay** in respect of responsibilities of the job basis experiences, education, skill etc.

- d. **Promotions** based on merit as per the internal policies of the Organization and deployment of appropriate internal policies for person with disability.
- e. **Support** in acquiring higher skills or education.
- f. **Training and Development** opportunities to enhance career growth.
- g. **Relevant Support** in offering time off for treatment and therapy.

5. Facilities provided to Disabled Persons

The Organization shall endeavour to provide various enabling facilities to persons with disabilities. The details of the same are mentioned in **Annexure I** of the policy.

6. Designated / Liaison Officers

Organization has nominated few officers of the Organization who will act as the designated / liaison officer and any grievance with respect to the violation of the Acts or this policy can be brought to the knowledge of any of these officers as per the process mentioned in clause 7 of the policy.

7. Grievance Information / Reporting

- a. Through a written complaint addressed to the “Designated Officers” appointed as per clause 6 of the policy, any aggrieved person can bring forward his or her complaint to the notice of the designated officers. The complaint can be shared by a letter or through an email or through the ethics hotline or toll free number as mentioned in the Whistleblowing Policy of the organisation or any other appropriate channel of communication available in the Organization to any of the designated officers.

Wherever the aggrieved person prefers to meet the designated officers in person to share the complaint verbally, the same shall be allowed by the designated officers. However, the designated officer will provide every support to the aggrieved person to make the complaint in writing and obtain his or her signature on the same. Alternatively, complaint of the aggrieved person can be reduced in written form by the designated officer and the complainant is required to sign the same.

- b. The aggrieved person should file his / her grievance immediately or within one month’s time after experiencing, witnessing, or acquiring the knowledge of the same. However, for the reasons to be recorded in writing, the designated officer may allow further extension of one month’s time to file the grievance.
- c. Depending upon the nature of the grievance, the Designated Officer shall forward the same to the “Resolution Committee” constituted as per clause 8 of the policy for its further investigation or enquiry and resolution.
- d. The aggrieved person shall fully participate and support in any investigation or inquiry initiated by the Resolution Committee.
- e. The Resolution Committee shall endeavour to resolve the grievance within 30 days from its receipt and share its outcome with the aggrieved person. The same can be done by the resolution committee directly or through the designated officers.

- f. It is made clear that the exclusive forum of the designated officer is created to enable the aggrieved person to raise the grievance to the Organization. Any designated officer may also act as a part of the resolution committee.
- g. Wherever the complaint is against the designated officer or any other officer of the resolution committee, the officer shall recuse himself or herself from participating in the investigation / enquiry process.

8. Duties of the Resolution Committee

The Resolution Committee shall constitute the CEO, CFO and CHRO of the organisation. The committee may involve / invite any other employee/s as they deem appropriate to be a part of the Committee for investigating any matter under its purview.

Depending upon the circumstances and the gravity of the grievance that is brought to the attention of Resolution Committee, the Resolution Committee may initiate further enquiries or investigations and endeavour to resolve / settle the grievance within a period of 30 days from the date of receipt.

During the course of the investigation or enquiry, the Resolution Committee may prefer to interact with different persons or inspect any documents to arrive at the conclusion. All the employees and other stakeholders shall support / participate as and when required in any such investigation or enquiry initiated by the Resolution Committee.

9. Confidentiality

All the persons connected with the grievance, investigation or enquiry shall maintain utmost confidentiality. Should any person breach any provision of the clause or any other provision of the policy, Organization shall initiate appropriate disciplinary action against such person.

10. Appellate Authority

Any person aggrieved by the decision of the Resolution Committee may prefer to appeal to the CEO of the Organization for his / her intervention. The CEO may interact with the resolution committee or complainant or any other person in his / her own discretion or advise any further investigation / enquiry to finally arrive at a conclusion. The decision of the CEO shall be considered as the final and shall be binding on all concerned including the complainant.

11. Obligations of the Employees and Other Stakeholders

All the persons employed by the Organization or having business relations with the Organization shall –

- a. Maintain high standards of individual conduct that would not make any other person feel discriminated, uncomfortable and violate employee's right to work with dignity in a working environment based on equality.
- b. Familiarize themselves with the contents of this Policy and honour its principles in spirit and in practice.
- c. Familiarize themselves with the penal consequences of violation of this policy.

12. Non – Retaliation

The aggrieved person or any person who is good in faith has shared the grievance or participated in the enquiry / investigation or has provided information pertaining to the incident/s of discrimination shall be protected from any kind of retaliation and the Organization shall observe zero tolerance in case of any such retaliation. Individuals engaging in retaliatory conduct or

wherever the outcome of the redressal process has concluded that the complaint is made to malign or disgrace the image of any person or the Organization, that individual/ s will be subject to disciplinary action by the Organization as per the internal standards.

13. Violation of the Policy

The violation of the policy or any clause of this policy would be viewed very seriously by the Organization which may result in initiating a disciplinary action against the person as per the disciplinary action policy of the Organization that may include separation of the employment or the business relations of the delinquent person/ employee depending upon the gravity of the violation period.

14. Review of the Policy

The policy shall be reviewed and amended by the Organization as and when required in its discretion or basis any statutory changes that are applicable to the Organization.

15. Policy Communication and Awareness

The policy extract is displayed in the corporate office of the Organization and all units on the notice / communication boards. The policy is also made available on the Zing HR portal for the information of all the employees of the Organization. The Organization will conduct policy awareness programs for employees through e-learning modules, poster campaigns, classroom sessions etc.

Annexure I

Refer Clause “5”

Facilities endeavored to be provided to Disabled

- a. **Safe Working Environment** – Walking spaces in the aisles always maintained free of obstacles. A reasonably comfortable and large working space is provided for every employee so that they can work comfortably. The overall office furniture arrangement is made in such a way that no protruding objects are hung on the walls or obstruct movement.
- b. **Digital Gadgets** – Appropriate to the appointment of persons with certain disabilities, the organization shall deploy digital gadgets which can be used by the visually impaired employees.
- c. **Accessible entrance** - Organization has created special facilities such as ramps, rails, and special toilets to suit the special needs of differently abled. The arrangement of wheelchairs is also made to use the ramps safely. Organization will provide the tactile signs at appropriate locations for the use of visually impaired employees.
- d. **Amenities** - All the amenities such as washroom, watercoolers, dining areas are organized in a manner that is easily accessible to the employees.
- e. **Other Reasonable accommodation** - Depending upon the request of the person with disability, the organization will accommodate any request to provide additional facilities to them.
- f. **Disability Consultants / Counsellor** – Organization will utilize the support of appropriate external experts, counsellor to improve the overall facilities that are offered by the Organization to the person with disability including, if required, special medical care.