

Human Rights Policy

1. Introduction

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 ensuring a diverse, inclusive and equitable work environment.

This policy shall be read in conjunction with:

- a. The Leela Code of Business Conduct and Ethics policy (‘Code’): our basic principles and standards are enshrined in the Code covering areas such as conflict of interest, personal behaviour, and compliance to laws and regulations.
- b. The Leela Anti Bribery and Corruption Policy: assesses, manages and mitigates known risks.
- c. The Leela Whistleblowing Policy: supplements the provisions set forth in the Code provides a mechanism to report and address concerns of all employees and temporary workers. This includes bribery, fraud or other criminal activity, miscarriages of justice, health & safety risks, damage to the environment and any breach of legal or professional obligations.
- d. The Leela Sexual Harassment at Workplace Policy: supplements the policy of non-tolerance towards any sexual misconduct and provides mechanism for redressal against complaints of sexual harassment of employees at the workplace.
- e. The Leela Positive Work Environment: supplements and expands on the provisions of personal behaviour and positive work environment requirements set out in the Code with a commitment to a positive, open and inclusive work environment free from discrimination, violence and harassment.

The Leela is committed to upholding human rights, this is only possible in an environment built on respect and dignity

2. Objective

The Leela seeks to foster an environment that builds and maintains a culture of Inclusivity. The Policy not only helps meet compliance but also reinforces long term relations with stakeholders including our employees, supply chain partners, guests, investors, business partners, government and non-governmental actors, the Human Rights Policy seeks to provide guidance for harmonized relations with stated stakeholders based on the fundamental principles of human rights.

If any stakeholder, internal or external observes an incident or practice that is inconsistent with our policies at our properties whether owned, franchised or managed or corporate office, the same maybe reported to the designated authorities or senior management or HR personnel. If concerns need to be raised anonymously, this may be done via The Leela’s Ethics Point reporting or via a toll-free hotline which is operated by an independent third party and is available 24 hours a day, 7 days a week. The same will be investigated and concluded.

3. Applicability

This policy. applies to all employees and temporary workers (collectively, “you” or “Employees”) of The Leela Palaces Hotels & Resorts¹, (collectively, “The Leela” “we”, “us,” “our,” or the “Company”).

This Policy reflects the standards that The Leela expects its business associates, partners, agents, contractors, third-party service providers and consultants (collectively, "Third Parties") to adhere to when interacting with The Leela and its Employees.

For the purposes of this Policy, a "business associate," "partner," "agent," "contractor," "third party service provider" or "consultant" means an individual or entity, including a subcontractor that provides and receives payments for services or goods related to any aspect of our business.

4. Scope of this Policy

Approach to Long term Stakeholder Value

The Organisation's commitment is aligned to the requirements of:

- a. The United Nations Universal Declaration of Human Rights
- b. United Nations Convention on the Rights of the Child
- c. United Nations Convention on the Elimination of All Forms of Discrimination against Women.
- d. The International Labour Organization (ILO) Conventions.
- e. United Nations Guiding Principles for Business and Human Rights

The Leela recognises the human rights risks associated with operating in the hospitality and tourism section. Towards this end the Leela identifies, evaluates and mitigates human rights impacts with internal and external stakeholders in the following key strategic areas:

- Compliance with labour commitments, statutory laws and regulations of the land and this Policy.
- Ensure the highest standards of integrity and ethical conduct as per "The Code of Conduct and Ethics" and values of The Leela.
- Undertake mapping exercises to understand supply chain and human rights related risks related to key environmental and social indicators
- Consider various risks that drive the level of due diligence, compliance checks as well as contractual obligations required of third parties.
- All hotel team members are required to complete training on the Code of Conduct and also recognise any human rights violations including human trafficking for sexual exploitations and forced labour.

Labour Priorities

Every business and its value chain partners will promote an equitable working condition in a diverse and inclusive work culture by giving special attention to the following labour priorities:

- Settlement of all individual disputes through a defined grievance redressal procedure. or arbitration / available conciliation machinery at the outset.
- Obtain employee feedback through channels including but not limited to town halls, ombudsman at regular intervals to ensure an equitable working environment t including setting up of joint councils comprising of equal participation of employee and contract workforce at properties
- Prohibition of employee recruitment based on individual bond, debt or obligations towards the Company or its representatives. Acceptance of cash deposits or a recruitment fee to secure employment are also prohibited.
- Employee's rights to negotiate the terms and conditions of employment under prevailing statute and framework.
- Zero tolerance towards child labour and ensuring the minimum age standard is set at 18 years for employment opportunities.
- Offer minimum wages that shall meet the needs of the employee as per applicable regulations. Wage documentation maintained for each employee explicitly mentions the wage calculation based on working hours linked to the biometric attendance systems for permanent employees and attendance registers for contractual workers with transparency on bonuses, incentives and deductions received for the month.

- Fair treatment of all employees with dignity and ensuring no tolerance to any form of discrimination, harassment or abuse based on caste, race, birth, nationality, gender, origin, religion, disability, family responsibility, marital status, political opinion, age, membership and sexual orientation.
- Highest standards of safety in operations.
- Ensure employees and business partner representatives are informed through frequently used modes of communication within a reasonable timeframe in case of change in operations.

5. Process

We will ensure commitment towards a diverse, inclusive and equitable workplace by undertaking several activities, including the following:

- Undertaking third party due diligence for suppliers categorised as high risk to build trust in our assessment and to identify the non-conformities
- Contractually obligate our suppliers to commit and abide by responsible procurement principles that includes human rights, code of conduct, anti -harassment, anti bribery and corruption guidelines.
- Awareness raising / Sensitizing employees of their workplace rights. Including communication and training to identify and report incidents that shall be investigated on confidential basis (if required)
- Rolling out of grievance redressal processes with suppliers and key external stakeholders
- Undertaking annual review of policy and processes in place