

WORKPLACE INTEGRITY

1. Equal Opportunity Workplace

Capri Hospitality Limited is committed to building a work environment of mutual trust, where all members are treated with dignity and respect. Members will be recruited, selected, developed, transferred and advanced basis our principle of meritocracy – requirements of the role and business.

You will treat all other Members of the Capri Hospitality Limited with dignity, courtesy, respect and with equality irrespective of race, colour, religion, gender identity, age, national origin, sexual orientation, marital status, physical disability, etc. You will not abuse your position and influence other Member(s) for committing any type of offence.

2. Harassment-Free Workplace

Capri Hospitality Limited stands committed to maintaining a work environment free from all forms of harassment and discrimination for all members consistent with its commitment to conduct its business in accordance with principles of equality, equal opportunity, and human rights. A key manifestation of a pleasant and conducive work environment is respect for the individual, irrespective of the gender, disability or religious orientation of the member concerned. In order to sustain this strongly through creation of a better understanding, behaviour that go against mutual respect have been articulated.

Capri Hospitality Limited aims to:

- a) Promote appropriate standards of conduct at all times
- b) Encourage the reporting of behaviour which breaches the Guidelines on Prevention of Sexual Harassment
- c) Provide an effective procedure for complaints based on the principles of natural justice
- d) Treat all complaints in a sensitive, fair, timely and confidential manner

3. Abuse - Substance or Alcohol

You will not use or be in possession or under influence of alcohol or illegal drugs or any other controlled / prohibited substance / material in the work place on the job or during working hours. In case you need to use / possess any such substance under medical prescription, then you shall immediately inform your Supervisor and HR representative.

4. Abuse of Position / Designation – Bullying

You will not abuse your position in the Company to gain any illegal advantage or for committing any offence. Bullying is unreasonable behaviour that is directed against an individual or group; by another individual or group and is derived from the misuse of power over the target of the behaviour. This may include:

- a) Verbal abuse, shouting
- b) Excluding or isolating behaviour
- c) Deliberately withholding information vital for effective work performance
- d) Giving employees impossible assignments
- e) Physical abuse

It is the responsibility of all Members to ensure that premises and facilities are free from harassment; every Member has a responsibility to meet this requirement.

5. Racial and Religious Vilification

Racial and religious vilification is conduct that incites hatred against, serious contempt for, or revulsion or severe ridicule against a person or group on the grounds of racial identification or religious belief or activity. Racial and religious vilification is a form of harassment and discrimination and is unacceptable conduct in the Company.

6. Respecting Privacy & Confidentiality of Members

You are expected to respect the privacy of other Members and safeguard the confidentiality of information that Capri Hospitality Limited or you had about such member. You shall comply with any and all local and international privacy and data protection laws.

Guidelines:

- a) Information pertaining to a member must be obtained only with prior consent of such Member;
- b) Members personal information gathered must be reasonable, relevant and not be intrusive in relation to the purpose for which it is collected. Such information shall only be used for the purpose for which it is collected and shall not be retained longer than necessary.
- c) All member personal information shall be kept confidential and secure.
- d) Advice must always be sought from Legal Function before gathering any personal information of a member or moving such information gathered outside the country of origin.

7. Internet Social Media Policy

You shall not represent the Company or any brand of the Company without prior written approval from your Supervisor, Head of such Brand in any blog site, social networking site, micro blog sites, photo / video sharing sites, chat rooms, chatting sites or alike. You will also adhere to the Capri Hospitality Limited Information Security Policy in this connection.

8. No member shall act as a spokesperson of the company before media or any other forum unless authorized by the board of directors. No member shall sign any contract, or give commitment on behalf of the company unless duly authorized.

9. All members shall report immediately any potential violation of any law by any other member. (It should be part of whistle blower policy.)

GRIEVANCE REDRESSAL MECHANISM

If you have a question or concern about legal or ethical standards, you can choose to reach out to multiple Members in the Company who will be equipped to help you resolve your concern. You have the following options for reaching out.

1. Email your query or complaint to whistleblower@caprihospitality.com
2. Your line management is usually a good place to start with a legal or business conduct issue who shall inform the Code of Conduct committee.
3. Your HR representative who shall inform the Code of Conduct committee.

If you observe behaviour that concerns you, or that may represent a violation of the Code or any law, raise the issue promptly. Doing so will allow the Company an opportunity to deal with the issue and correct it, ideally before it becomes a violation of law, security or the Company's reputation.

ADMINISTRATION AND GOVERNANCE OF THE CODE

The Company has constituted a Committee which will also be known as 'Code of Conduct Committee' (CCC).

The CCC comprised of the following members;

Name	Designation	Email Address
Mr Shakti	Administration Head	callforhelp@caprihospitality.com
Mrs Ashalata Nair	Chair Person	
Ms Neethu	VP Human Resources	
Ms Pooja Sharma	Mgr - Human Resources & Co-ordinating Member for the committee	
Ms Chacko	Educationist , Social Reformer	

Role and functions of Code of Conduct Committee

1. Code of Conduct Committee (CCC) will primarily deal with complaints / concerns relating to issues.
2. Record and investigate all complaints / concerns received.

Role and functions of Whistle Blower Committee:

1. Whistle Blower Committee will primarily deal with complaints / concerns relating to the Company Assets and / or Financial Integrity.
2. CCC on receiving complaint related to Company Assets and / or financial integrity or if CCC has reason to believe that there is any violation of any discipline in connection with Company Assets and / or financial integrity, then it will promptly divert such complaints to Whistle Blower Committee.
3. Whistle Blower Committee may also receive complaints / concerns directly or indirectly.

Role and functions of Prevention of Sexual Harassment Committee

1. POSH Committee will primarily deal with complaints / concerns relating to sexual harassment at workplace.
2. CCC on receiving complaint related to sexual harassment or if CCC has reason to believe that there is any incident of sexual harassment, then it will promptly divert such complaints to POSH.
3. POSH Committee may also receive complaints / concerns relating to sexual harassment directly or indirectly.
4. POSH shall report to CCC.

CCC will operate on the following principles:

- a) Confidentiality,
- b) Impartiality,
- c) Promptness,
- d) Sensitivity,
- e) Courtesy and
- f) Respect

Responsibilities of CCC

1. Administering, implementing and overseeing ongoing compliance under the Code.
2. Establishing, amending where necessary and administering procedures to assure that reports of Improper Activities will be collected, reviewed promptly, treated or resolved in an appropriate manner, and retained.
3. Making himself or herself available to discuss with Member(s) any complaints raised or reports filed personally with such CCC Member or otherwise.
4. All reports will be promptly investigated and appropriate corrective action shall be taken.
5. In case any Member of sub-committee has reason to believe that there is any violation of the Code / law, then in such situation, such Member should promptly inform in writing any Member of CCC of such incident and then after obtaining directions of CCC, conduct investigation.
6. Provide directions, instructions and assistances to all sub-committees.

Meetings of CCC

1. CCC shall meet as and when necessary, but at least four times in a year; ideally at the start of each quarter to review / report matters / issues of the last quarter.
2. All records of investigation / proceedings / records pertaining to any case / complaint will be kept confidential.
3. Only Members of CCC and Board of Directors will have access to such records.

Quorum of CCC Meeting

1. Presence of minimum three members of CCC will be considered valid for any decisions regarding selection of investigating committee or for the presentation of findings of investigation or for deciding any case about any Code violation.
2. Any Member of CCC absent without any valid reason for more than three consecutive times for the CCC meetings may be removed and new Member may be appointed by the remaining CCC Members.

Maintenance of case files, records, and reports

1. All cases investigated under this Code will be maintained in a file.
2. Each case will carry a formal closure report, which will be signed by the Chairman of CCC within 30 days of deciding the case.
3. All case papers, investigation reports with case closure report will be physically filed with the Head HR.

Anonymity and Confidentiality

CCC will not distinguish between any complaint / issues raised anonymously and those raised with identity disclosed. When you report any non-compliance, violation or any complaint to the CCC through any medium, you may choose to remain anonymous, although you are encouraged to identify yourself to facilitate investigation / communication.

If you make your identity known, the Committee and investigators will keep your identity confidential, consistent with conducting a thorough and fair investigation. In case you complain / raise any issue anonymously, attempt will nevertheless be made to seek details from the anonymous complainant. CCC will not make any effort to attribute the identity of the anonymous complainant to any Member.

INVESTIGATIONS

All complaints that make out a prima facie case of violation of the Code shall be investigated. The Company may handle the investigation internally or engage expert investigators.

CCC takes all reports of possible misconduct / violation of law / Code seriously. CCC will investigate the matter confidentially, make a determination whether the Code or any law has been violated, and take appropriate corrective action. While conducting an Investigation following any complaint, CCC will ensure it adheres to the

Principles of Natural Justice namely:

1. Both parties shall be given reasonable opportunity to be heard along with witnesses and to produce any other relevant documents
2. No Person will be allowed to be a judge in his / her own case
3. The final decision will be made after due investigation and the application of proper reasoning.
4. The order of the CCC shall be in writing and shall contain reasons for arriving at the decision.

Upon completion of the investigation, both parties (if the identity of the complainant is known) will be informed of the decision of CCC. No set of rules can cover all circumstances. These guidelines may be varied as necessary to conform to local law or contract.

Decision of CCC

5. CC Members shall decide the cases about any Code violations.
6. Decision of CCC shall be final and binding upon the Members involved in a particular case.
7. CCC shall provide reasoning to its decision.
8. Presence of minimum three members of CCC will be considered valid for any decisions regarding selection of investigating committee or for the presentation of findings of investigation or for deciding any case about any Code violation.
9. In the event of any dissent within the CCC on any decision, the decision of the majority shall prevail. In the event of equal number of votes cast for and against a decision, there shall be re-voting. In the event that the re-voting also results in equal number of votes cast for and against the decision, then the Chairman of the CCC shall have a casting vote.

Disciplinary Actions

CCC strives to impose discipline that fits the nature, gravity and circumstances of each Code violation. It uses a system of progressive discipline, issuing letters of reprimand for less significant, first-time negligent offenses. Violations of a more serious nature may result in transfer, suspension without pay; loss or reduction of merit increase, bonus or stock option award; or termination of employment without compensation. The complainant's views may be taken into consideration for this purpose.

No Retaliation

The Company has an unwavering policy against retaliation for raising a good-faith concern under this Code. The Company values the help of members or associates who follow this Code of Conduct and raises a concern or reports misconduct / violation. Any retaliation against a member or organization that raises an issue honestly is a violation of this Code. That a member has raised a concern honestly, or participated in an investigation, cannot be in any circumstances, the basis for any adverse employment action, including separation, demotion, suspension, loss of benefits, threats, harassment or discrimination. Allegations of retaliation will be investigated and appropriate action will be taken. Anyone responsible for reprisals against individuals who report suspected misconduct or other risks to business will be subjected to disciplinary action up to and including dismissal. If you believe someone has retaliated against you, or if you suspect that you or someone you know has been retaliated against for raising an ethical issue report the matter immediately to the Ethics Committee.

Making False Accusations

Honest reporting does not mean that you have to be right when you raise a concern; you just have to believe that the information you are providing is accurate. Knowingly making false accusations will constitute a violation of this code and will be investigated accordingly.

ANNEXURES

1. Whistle Blower Policy
2. Prevention of Sexual Harassment at Work Place