EIH Associated Hotels Limited
A MEMBER OF THE OBEROI GROUP

HUMAN RIGHTS POLICY

Saturday, November 7, 2026

Version	Revision Date	Approved by	Date of Approval
2nd Version	10th November 2026	Board of Directors	10th November 2026

Introduction:

EIH Associated Hotels Limited (hereinafter referred to as "EIHA", the "Company", or "We/Us/Our") is committed to conducting its business in a transparent, ethical, and responsible manner while respecting and promoting human rights throughout its operations and value chain. This Policy outlines our commitment to upholding internationally recognized human rights standards and ensuring that our business activities do not infringe upon the rights of our employees, guests, suppliers, business partners, and local communities.

This Human Rights Policy is guided by internationally recognized human rights principles and standards, including the Universal Declaration of Human Rights (UDHR), the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Labour Organization (ILO) Core Conventions, the United Nations Global Compact (UNGC), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and the principles of SA8000 covering areas such as human rights, labour practices, environmental responsibility, and ethical business conduct.

EIHA recognizes that respect for human rights is a fundamental responsibility of business. We are committed to conducting our operations in a manner that respects the dignity, freedom, equality, health, safety, and well-being of all individuals affected by our activities.

Scope and Applicability

This Policy applies to all employees, directors, officers, contractors, consultants, suppliers, and other business partners of EIHA and its subsidiaries. EIHA expects all individuals and entities within its sphere of influence to uphold and respect the human rights principles outlined in this Policy.

We encourage our business partners, suppliers, and contractors to adopt and maintain practices that are consistent with internationally recognized human rights standards and to demonstrate a commitment to protecting and promoting human rights in their operations and business relationships.

Definitions:

- **Human Rights**: Fundamental rights, freedoms, and standards of treatment to which all individuals are entitled, regardless of nationality, ethnicity, race, gender, religion, age, disability, sexual orientation, gender identity, socioeconomic status, or any other status, as recognized under applicable laws and internationally recognized human rights principles.
- **Child Labor**: Any work that is mentally, physically, socially, or morally harmful and interferes with the education of a child under the minimum age prescribed under applicable law and, in any case, not less than the age permitted under applicable labour legislation.
- **Forced Labor**: Any work or service that is compelled from an individual under threat of penalty and for which the individual has not offered themselves voluntarily.
- **Human Trafficking**: The coercion, deception, or threat-driven recruitment, transportation, and exploitation of individuals for labor or sexual exploitation.
- **Modern Slavery**: Situations of exploitation where individuals cannot refuse or leave due to threats, violence, coercion, deception, or abuse of power.
- **Retaliation**: Any adverse actions taken by an employer or other parties against an employee or worker in response to the individual's exercise of their legal rights or reporting of wrongdoing.

- **Living Wage**: A wage that meets or exceeds the minimum income required to cover the basic needs of workers and their families, including food, housing, clothing, healthcare, transportation, and education. A living wage excludes bonuses, incentives, and overtime pay and is determined based on the applicable cost of living and recognized benchmarks. It is distinct from the statutory minimum wage, which may not always be sufficient to meet basic living requirements.

Principles of the Policy

Human Rights Due Diligence

EIHA periodically conducts human rights due diligence to identify, assess, prevent, mitigate, and monitor actual or potential human rights risks arising from its operations, projects, business relationships, supply chain, and service providers. The Company undertakes human rights risk assessments and implements corrective measures where risks or adverse impacts are identified.

Findings from human rights assessments are considered in business decision-making, supplier engagement, corrective action plans, and risk management processes.

Significant human rights risks and adverse impacts identified through due diligence processes are escalated to senior management and, where appropriate, reported to the Board of Directors or its delegated committee for oversight, review, and necessary action.

Forced and Child Labour

We are steadfast in implementing ethical labour practices throughout our operations and have zero tolerance for any form of forced and/ or child labour. We uphold the fundamental right of all workers to freely choose their employment and explicitly reject any form of compulsory, forced, indentured, or bonded labour in our workforce. We maintain a zero-tolerance policy towards disrespectful or inappropriate conduct, unfair treatment, or any form of retaliation. Our commitment includes full compliance with labour regulations, such as the United Nations Convention on the Rights of the Child (UNCRC), Modern Slavery Act and International Labour Organization Minimum Age Convention.

Eliminating Human Trafficking and Modern Slavery:

Given the nature of our business, we recognize the serious issue of human trafficking. The Company maintains a zero-tolerance policy towards human trafficking and collaborates with its hotel operators to implement measures that prevent involvement in any activities related to human trafficking. The Company raises awareness about such exploitation and cooperates with law enforcement authorities in applicable jurisdictions to address any instances of trafficking or exploitation that come to its attention.

Child Protection

The Company is committed to protecting children from exploitation, abuse, neglect, trafficking, and other forms of harm. Employees are encouraged to report any suspected child exploitation or abuse observed within Company premises or during business operations in accordance with established reporting procedures and applicable laws.

Protection of Migrant and Contract Workers

The Company is committed to ensuring fair treatment of contract, temporary, outsourced, and migrant workers. The Company does not require workers to pay recruitment fees, surrender original identity documents, or work under exploitative employment conditions.

The Company does not retain original passports, identity documents, work permits, or personal belongings of employees or workers. Employees are free to terminate their employment in accordance with applicable notice requirements and are not subjected to coercion, financial penalties, intimidation, or other practices that restrict their freedom to leave employment.

Protection of Vulnerable Groups

The Company recognizes that certain individuals and groups may be at greater risk of discrimination, exploitation, or adverse human rights impacts. The Company is committed to promoting equal opportunity, inclusion, dignity, and protection for women, persons with disabilities, migrant workers, young workers, contract workers, and other vulnerable groups within its operations and business relationships.

Responsible Supply Chain

The Company expects suppliers, contractors, manpower agencies, and business partners to comply with applicable labour laws and internationally recognized human rights standards. The Company assesses, monitors, and audits suppliers, where necessary, and reserves the right to take corrective action or terminate business relationships in cases of serious human rights violations.

The Company's human rights expectations extend across its value chain and apply to suppliers, contractors, manpower agencies, housekeeping service providers, security service providers, laundry vendors, food and agricultural suppliers, and other business partners engaged in its operations. The Company expects these parties to uphold ethical labour practices, respect human rights, and comply with applicable laws and internationally recognized human rights standards.

Suppliers and business partners are encouraged to communicate these human rights expectations within their own operations and supply chains and take reasonable steps to identify and address human rights risks.

Discrimination and Harassment:

We are committed to fostering a diverse, equitable, inclusive, and respectful workplace where every individual is treated with dignity and respect. The Company maintains a zero-tolerance approach toward all forms of discrimination, harassment, bullying, victimization, and retaliation.

Discrimination or harassment based on race, colour, religion, caste, ethnicity, nationality, ancestry, age, disability, marital status, pregnancy, gender, Transgender status, gender identity or expression, sexual orientation, HIV-positive, genetic information, socioeconomic status, or any other characteristic protected under applicable law is strictly prohibited.

The Company prohibits all forms of harassment, including sexual harassment and non-sexual harassment, whether verbal, physical, visual, psychological, written, electronic, or otherwise. Any conduct that creates an intimidating, hostile, offensive, humiliating, or unsafe work environment will not be tolerated.

Complaints relating to sexual harassment are addressed in accordance with the Company's Prevention of Sexual Harassment (POSH) Policy and applicable legal requirements.

The Company is committed to providing accessible workplaces and reasonable accommodation for persons with disabilities, enabling equal access to employment, training, career development, and workplace facilities.

We are committed to providing equal employment opportunities in every aspect of the employment lifecycle, including recruitment, hiring, training, compensation, promotion, career development, transfers, and termination decisions, based solely on merit, qualifications, and business requirements.

Freedom of Association and Collective Bargaining:

We uphold our employees' freedom to join, form, or abstain from labor unions and to engage in collective bargaining without fear of retaliation, intimidation, or harassment. When our employees are represented by legally recognized unions, we are committed to fostering a constructive dialogue with their chosen representatives. The Company negotiates in good faith with employee representatives and promotes fair and respectful bargaining practices.

Fair Compensation:

We are committed to providing fair and equal compensation to our employees and workers that aligns with industry standards and local labour markets. This commitment entails compliance with relevant labour laws concerning wages, working hours, leave policies, overtime, and other compensation and benefits in all locations where we operate.

We are committed to avoiding excessive overtime, and setting maximum working hours to safeguard employee health, safety, and well-being. We ensure that the workers are provided with paid annual leave in accordance with applicable laws and international labor standards. The Company recognizes the importance of a living wage and maintains compensation practices that support employees in meeting their basic needs and maintaining a reasonable standard of living, in compliance with applicable laws and in consideration of industry practices and employee well-being.

Occupational Health and Safety:

The Company prioritizes the physical health, safety, and mental well-being of its employees and promotes a balanced and healthy work environment. The Company has implemented appropriate workplace safety standards, employee welfare measures, and health and safety management practices to maintain a safe, healthy, secure, and productive workplace. The Company supports emergency preparedness, accident reporting and investigation mechanisms, the provision and use of appropriate Personal Protective Equipment (PPE) wherever required, and initiatives that promote the physical and mental well-being of employees. The Company also encourages a proactive safety culture aimed at preventing workplace injuries, illnesses, and occupational hazards.

Security Practices

Security personnel engaged by the Company perform their duties in a manner that respects human rights, dignity, and privacy. The Company does not tolerate the use of excessive force, harassment, discrimination, or intimidation by security personnel.

Employee Upskilling and Development:

EIHA ensures equal access to learning and development initiatives for all members of our workforce, regardless of gender, age, or physical abilities. These programs are tailored to individual roles within the organization and encompass targeted training in technical skills, managerial capabilities, process expertise, industry-specific knowledge, and leadership development opportunities.

Human Rights Awareness and Training

The Company is committed to promoting a culture of respect for human rights through education and awareness. Human rights awareness training is conducted periodically for employees, managers, and relevant business partners based on risk exposure, operational requirements, and applicable legal obligations.

Individual Responsibilities

All employees, contractors, suppliers, and business partners are expected to comply with this Policy, participate in applicable training programs, report concerns in good faith, and support a workplace culture that respects human rights.

Governance:

The Board of Directors or its delegated committee provides oversight of the Company's human rights commitments. The Human Resources function, business leaders, and line managers are responsible for implementing, monitoring, and reporting on compliance with this Policy and associated human rights standards throughout the organization.

Grievance Redressal Mechanism

We are committed to providing an accessible, fair, and effective grievance redressal mechanism through which employees and other stakeholders may raise concerns relating to human rights, workplace practices, employment-related matters, or violations of this Policy without fear of retaliation.

All concerns and grievances are handled confidentially and may be reported through the designated grievance channel at **Disclosure@oberoigroup.com**.

In accordance with applicable laws and regulations, including provisions relating to grievance redressal under the Industrial Relations Code, 2020, each hotel/unit maintains an appropriate Grievance Redressal Committee, wherever required. These committees address and review employee grievances relating to employment terms, compensation and benefits, working conditions, disciplinary matters (except matters covered under separate statutory mechanisms), human rights concerns, workplace issues, and other non-sexual harassment grievances. Each hotel/unit maintains records of grievances received, investigations conducted, actions taken, and resolutions achieved, in accordance with applicable legal, regulatory, and internal compliance requirements.

In addition to the hotel/unit-level committees, the Company has established a Centralized Grievance Committee to oversee grievance management across the organization, ensure consistency in grievance handling, monitor compliance requirements, provide guidance on complex matters, and review cases escalated from hotel/unit-level committees where necessary.

The respective hotel/unit management and Grievance Redressal Committees are responsible for ensuring that all grievances are appropriately documented, reviewed, investigated, and resolved in an impartial, fair, and timely manner, while addressing any potential conflicts of interest that may arise during the process. All grievance records are maintained and preserved in accordance with applicable laws, regulations, Company policies, and record-retention requirements.

Upon completion of an investigation, appropriate corrective, disciplinary, or remedial actions are taken, where necessary. The Company resolves grievances within the timelines prescribed under applicable laws and internal procedures and maintains appropriate communication with concerned individuals regarding the status and outcome of their complaints.

Where a grievance remains unresolved through internal mechanisms, individuals may seek recourse through the appropriate legal or regulatory channels available under applicable law. The Company strictly prohibits retaliation against any individual who raises a concern or grievance in good faith and takes corrective, disciplinary, or other appropriate action against any person found engaging in retaliatory conduct.

Remediation and Corrective Action

Where the Company identifies that it has caused or contributed to adverse human rights impacts, it takes appropriate corrective and remedial actions consistent with applicable laws and Company procedures. The Company seeks to prevent recurrence and address root causes.

Privacy and Personal Data Protection

The Company respects the privacy rights of employees, guests, and stakeholders and processes personal information in accordance with applicable data protection laws and Company policies.

Reporting and Communication:

The Company communicates this Policy to employees, contractors, suppliers, and relevant stakeholders and makes it available through appropriate internal and external communication channels. The Company periodically reports on its human rights commitments, initiatives, and performance in accordance with applicable legal, regulatory, ESG, sustainability, and BRSR reporting requirements.

Non-Retaliation

The Company is committed to maintaining an environment where employees and other stakeholders can raise concerns, report suspected violations, participate in investigations, or exercise their legal rights without fear of retaliation.

The Company strictly prohibits any form of retaliation, intimidation, harassment, discrimination, or adverse treatment against individuals who, in good faith, report concerns relating to human rights, workplace misconduct, unethical behaviour, or violations of this Policy. Any act of retaliation is treated as a serious violation and results in appropriate disciplinary action in accordance with applicable policies and procedures.

Community Engagement

The Company recognizes and respects the rights, dignity, interests, and cultural heritage of local communities affected by its operations and is committed to engaging with local stakeholders in a transparent, respectful, and responsible manner.

The Company considers the potential social, economic, and environmental impacts of its operations, expansion activities, projects, and business decisions and seeks to foster sustainable and mutually beneficial relationships with local communities.

The Company recognizes the importance of creating positive social and economic value and, where feasible and appropriate, supports local employment opportunities, engages local suppliers and service providers, and contributes to the economic and social development of the communities in which it operates. The Company seeks to avoid adverse impacts on local communities, cultural heritage, traditional livelihoods, land rights, and access to natural resources arising from its operations, expansion activities, or business relationships.

Respect for Guests and Customers

The Company is committed to treating guests and customers with dignity, fairness, respect, and equality, without discrimination based on any protected characteristic.

The Company is committed to providing accessible facilities and services for guests with disabilities and fostering an inclusive, welcoming, and respectful hospitality experience for all guests.

Environmental and Human Rights Impacts

The Company recognizes the interrelationship between environmental sustainability and human rights, including access to clean water, sanitation, health, livelihood, and community well-being.

The Company manages its environmental impacts through responsible operational practices, including pollution prevention, waste management, resource efficiency, and the sustainable use of natural resources. The Company seeks to minimize adverse environmental impacts arising from its operations and considers the potential effects of resource consumption, environmental degradation, and pollution on employees, guests, local communities, and other stakeholders.

Monitoring, Reporting and Policy Review

The Company periodically reviews, monitors, assesses, and evaluates the effectiveness of this Policy through audits, risk assessments, grievance analysis, compliance reviews, human rights due diligence exercises, and management oversight mechanisms. The Company also assesses and, where applicable, discloses its human rights performance and related initiatives in alignment with applicable ESG, sustainability, and Business Responsibility and Sustainability Reporting (BRSR) requirements. This Policy is reviewed periodically and updated, where necessary, to ensure continued alignment with applicable laws, regulatory requirements, industry practices, internationally recognized human rights standards, and evolving stakeholder expectations.