



CONFLICT OF INTEREST POLICY

I. Purpose

This policy defines the framework within which Elior India manages potential conflicts of interest in accordance with the Elior India's Anti-Corruption & Bribery Policy in accordance with the laws applicable in India i.e. Indian Penal Code 1860 and Prevention of Corruption Act 1988 and Elior Group's Integrity & Ethics Guidelines available at (<https://integrity.eliorgroup.net/>). Each employ working in Elior India or its subsidiaries must adhere to its Policies and shall and comply with its norms. Non-adherence to compliance Policies will lead to strict action against the employees involved in the action.

II. Applicability

This Conflict of Interest Policy is an information tool for employees in order to help them to detect and avoid a potential conflict of interest. This Policy applies to Elior India's Clients/Customers, Suppliers, Operators, Sales & Marketing and Vendors to comply with Elior's standard rules and regulations to be compliant in every aspect.

III. Responsibilities

Elior India commits to ensure full compliance with anti-corruption laws and to avoid any personal activities which may be in conflict with the professional activities.

The employees are advised to avoid holding any equity interests – either directly or indirectly through a third party – in companies that have business relations with the Elior India or its group companies, when such holdings could lead to a conflict of interest or with someone (family, friends, etc.) who has decision-making power or a position that may put them in contact with the Elior India or its group Companies. In such a case, the employees must ensure to report the matter to their respective Line Manager/HR / Company Secretary & legal and shall comply as per the defined rules:

The rules to be respected include ensuring that:

- i. under no circumstances shall the person who holds a direct or indirect interest participate in the negotiation of the contract;
- ii. the signed contract is in the Elior India's interest and is carried out at market value.

IV. Non-Adherence

The Policy specifies the good practices defined in the Group's Elior integrity & Ethics guide, which all persons concerned must respect or otherwise be subject to disciplinary sanctions, which may go as far as immediate dismissal, depending on the seriousness and frequency of the events.

V. Prevention and detection of corruption

The prevention, detection and reporting of Conflict of interest is the primary responsibility of all the employees working with Elior India or its affiliates as per the norms defined in the Integrity & Ethics guidelines. Any employee who witnesses a breach of this policy is obliged to promptly report the matter to the dedicated line for whistleblower as per **Group Elior Whistle blower charter** by contacting the compliance consultant through email at alert.eliorgroup@isope.solutions or by calling on **India help line No 0008003201479** or reporting the matter to **Company Secretary & Legal**.



Sanjay Kumar
MD & CEO-Elior India

Bangalore India
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