



## SPONSORSHIP & DONATION POLICY

### I. Purpose

This policy defines the framework within which Elior India contribute towards its sponsorship and donations operations in accordance with the Elior India's Anti-Corruption & Bribery Policy, Integrity & Ethics guidelines available at <https://integrity.eliorgroup.net/> and the laws applicable in India. Each employ working in Elior India or its affiliates must adhere to its Policies and shall strictly comply with its norms. Elior India does not tolerate any act of corruption.

### II. Objectives

This sponsoring and donation policy is an information tool for our potential partners and for employees in the fight against corruption in the context of our business or activities. This Policy applies to Elior India's Management, Employees, Contractual workers, Clients/Customers, Professional Consultants, Agents, Suppliers, Operators, Sales & Marketing and Vendors etc. to comply with Elior's standard rules and regulations to be compliant in every aspect.

### III. Responsibilities

Elior India commits to ensure our full compliance with anti-corruption laws. It is strongly recommended to limit the number of contributions in sponsoring or donation operations and to remain within reasonable amounts as per defined norms of Anti- Corruption & Bribery Policies. It is essential that we all be vigilant because of the considerable impact of the risks that can be incurred from a financial, reputational, legal and criminal point of view.

Elior India supports charitable, sports or any event which has a concern for social cause. In any case, it should be remembered that these contributions should under no circumstances be perceived as the counterpart of a commercial relationship unless it is officially part of the specifications of the commercial relationship. In addition, our commitments must be specific and shall not exceed a period of one (1) year.

An agreement must be systematically signed, according to the model provided by the legal department. To avoid any risk, any contribution in a sponsoring or donation operation must be justified and validated by senior management after prior consultation with the Company secretary & Legal. **The limit shall not exceed INR 8,00,000 (Indian Rupee Eight Lakh Only) on yearly basis. Elior India must obtain prior approval from the Group's Chief Compliance Officer, the Group's Communications Department and the Group's General Counsel for any amounts allocated over and above INR 800,000/- (INR Eight Lakhs Only).** The Marketing and Communications Department must ensure the compliance as per the norms defined.

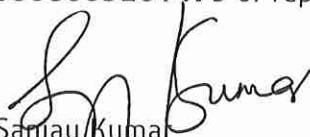
The Company requires to maintain list of Sponsorship and Donations as per the **Annexure I**

#### 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 corrupt practices 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](mailto: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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