

## ***Section IV: Working in the TCIL Community***

**TCIL is as responsible for ethical dealings with and among its employees, as with its customers and suppliers. Our responsibilities go beyond those we have to customers and suppliers, to those we have to each other and to the communities in which we work.**

**Today, every TCIL employee has an important role to play in making the Company a constantly more exciting, inspiring and rewarding place to work. Through a Company-wide initiative, TCIL is seeking to unlock the full energy, potential and creativity of each member of the organisation and the teams in which they work. Behind this commitment are policies designed to provide all of us with the opportunity to work to our full capabilities. Further, TCIL values a well-motivated and positive workforce and hence is strongly against any form of workplace harassment.**

### ***Policy VI: Equal Employment Opportunity***

*Every individual has a right to be treated with dignity. In recognising and respecting the needs of individuals, TCIL aims to promote equal opportunity and fair treatment for all employees on the basis of merit. HR policies will promote diversity and equality in the work place. All employees will be treated with dignity. All employees of TCIL and those of its subsidiary companies, have a duty not to breach this policy.*

### ***Requirements***

- Use merit, qualifications and other job-related criteria as the sole basis for all employment related decisions and other matters affecting employees.
- Recruit, hire, train, compensate, promote and provide conditions of employment without regard to a person's race, colour, religion, national origin, sex, age, disability, veteran status or other characteristics protected by law.
- Ensure that there is no discrimination against employees having or perceived as having HIV or AIDS.
- Ensure selection of successful candidates based on qualifications and merit.
- Foster co-operation and teamwork among your co-workers.
- Respect the rights and dignity of those who may be different from you and others.
- Ensure that every employee gets a fair appraisal of his performance against standards set for his role.

## ***Section I: Working with Customers and Suppliers***

**No matter how fierce the competition may be, no matter how high the stakes may seem, TCIL will compete only by lawful and ethical means. When working with customers and suppliers - as in every other dimension of our business -we will not compromise on our Commitment to Business Ethics and Integrity.**

**The success of TCIL's Business Ethics and Integrity Policy depends on the integrity of everyone inside and outside the Company who is involved in the process.**

**This section offers an overview of three TCIL policies that relate to customers and suppliers: Ethical Business Practices, Following International Trade Controls, and Supplier Relationships.**

### ***Policy I: Ethical Business Practices***

*TCIL expects employees to use only ethical practices in selling its products and services and in representing the Company to governmental authorities. This policy sets forth the ethical standards of conduct and practices which must be followed with respect to certain kinds of payments, entertainment, as also political contributions to governmental authorities. We must ensure fair dealings with our customers. TCIL is against bribery and corruption in any form and endeavours to comply with laws related to bribery and corruption in jurisdictions in which it has operations.*

*Bribery and corruption may be used interchangeably and are defined differently under various laws related to bribery and corruption (including the Prevention of Corruption Act, the Foreign Corrupt Practices Act and the Bribery Act).*

*Bribery and corruption may be broadly understood as offering, giving or receiving of something of value in exchange for influencing the recipient in the exercise of his/her duty and to incline him/her to act contrary to the accepted standards of honesty and integrity.*

*Some of the salient points covered under the respective Acts are mentioned as follows:*

- A Public Official is punishable if he/she accepts a gratification in any form or an improper payment in return or as a reward for an official act or a promise of one, as an unfair favour to any person.*
- In case any person accepts a gratification or an improper payment with a view to influencing a Public Official to exercise his/her official function for an unfair favour to any other person is also punishable.*
- Commercial or private bribery as well as failing to establish adequate procedures in place for preventing bribery is also an offense.*
- Abetment of the offences explained above is also an offence.*

*TCIL will not authorise, involve itself in, or tolerate any business practice that does not follow this policy.*

## ***Policy IX: Off Duty Conduct***

*TCIL has created a brand/reputation over the years. Accordingly, TCIL expects that employees behave in a manner that does not have an adverse impact on its brand/reputation, even when they are not performing their professional duties.*

### ***Requirements***

Every employee is expected to conduct their personal affairs in a manner that does not hamper their ability to perform their duties at TCIL, interfere with the business interests of TCIL, or impact the reputation and brand of TCIL.

### ***Employee responsibilities: (Also refer point (2) of Introduction)***

- Conduct themselves outside office in a way that does not adversely affect TCIL's business interests/reputation/brand or their ability to perform their job.
- Do not engage in additional employment or other activities that may interfere with their responsibilities at TCIL.
- Ensure that off-duty activities conform with applicable laws and regulations.
- Refrain from the unauthorized use of TCIL assets and premises when off-duty.
- Do not come to the workplace in an inebriated state.
- Do not smoke at areas that are not designated for smoking. TCIL's properties are a non-smoking premise and everyone is requested to co-operate in this respect.
- Do not abuse illegal drugs or medications at the workplace. The use of medications is allowed only in cases that are backed by genuine medical reasons and prescriptions (where warranted).
- Do not consume, possess or distribute any kinds of illegal drugs, mind altering or intoxicating substances in the office premises or while on official work.

### ***Additional responsibilities of Managers/Department Heads/Heads of Subsidiary Companies /EXECOM: (Also refer point (3) of Introduction)***

### ***Penalties for violation: (Also refer point (7) of Introduction)***

Any conduct that goes against this policy will not be tolerated and is liable to disciplinary action against the employee.

## ***Policy XI: Health and Safety***

*TCIL will provide a safe and healthy environment for customers, visitors, employees and contractors ensuring that statutory requirements of health and safety are met. Making sure we follow all health and safety laws is the job of every TCIL employee at every level. We will set high goals for ourselves to continue to improve our health and safety compliance. We will hold ourselves and our managers accountable for their performance on this policy.*

### ***Requirements***

- Comply with applicable health and safety laws and regulations (including the provisions of the locally applicable Shop and Establishments Act in relation to ventilation, cleanliness, lighting, precautions against fire, first-aid, etc).
- Take appropriate measures to prevent workplace injuries and illnesses, and to provide employees with a safe and healthy working environment.
- Eliminate unreasonable risks from TCIL's facilities.
- Provide adequate training, instruction and supervision to enable employees to perform their work safely and efficiently.

### ***Employee responsibilities: (In addition to point (2) of Introduction)***

Employees have a legal obligation to:

- Take reasonable care for their own health and safety and that of others who may be affected by their actions.
- Inform the Company through the HR department or their supervisor, in cases where they suffer from life threatening or contagious diseases.
- Ensure that they have disclosed all illnesses they have prior to joining the company. This disclosure includes all diseases like diabetes, liver / kidney / heart / back problems, etc. – which will hamper with the employee discharging his / her duties to the satisfaction of the Company.
- Co-operate with the Company by following instructions and guidance.
- Use and take due care of anything provided by the Company to protect them whilst at work and report any defective safety equipment immediately.
- Observe all precautions laid down by the Company for health and safety at work.

### ***Additional responsibilities of Managers/Department Heads/Heads of Subsidiary Companies/ EXECOM: (Also refer point (3) of Introduction)***

- Managers/Department Heads/Heads of Subsidiary Companies / EXECOM will make sure this policy is part of an over all policy compliance program as described in point (5) of Introduction.
- Ensure that employees know and understand their responsibilities for health and safety.

- Promote health and safety by instructing employees in safe working practices and good house keeping.
- Conduct regular health and safety checks, identify problems, organise corrective action and monitor as appropriate.
- Ensure that all employees know the current local arrangement for first aid, fire procedures and accident reporting.
- Ensure that all employees are trained to operate the safety equipment correctly.
- Ensure the safety of customers/visitors/contractors whilst on Thomas Cook premises.
- Refer any unresolved matters to the Administration Department.
- Managers responsible for a facility, activity, product or service will:
  - Communicate responsibly with the employees, communities, customers, and government agencies regarding health and safety issues.
  - Co-operate with the public, government, and interested parties to develop appropriate regulatory and public policies that protect employees and public health, and the environment.
  - Ensure that prospective employees are appropriately screened by designated Company Doctors before appointment, and that their continued appropriateness for their positions vis a vis their health status, is periodically reviewed. Alternately, prospective employees need to submit a “medical fitness” declaration from a medical doctor of repute.
  - Promptly report to the HR and Administration Departments:
    - emergency evacuation, communicable disease or other serious health incidents which may have exposed employees to health hazards
    - work-related employee fatalities and other serious safety incidents requiring a report to a governmental agency.

***Penalties for violation: (Refer point (7) of Introduction)***