

POLICY ON RESPONSIBLE MARKETING

Philosophy

ITC Hotels Ltd. (ITCHL) is committed to responsible marketing practices. ITCHL believes in marketing practices that are truthful and respectful, and strives to ensure that its marketing activities align with the core values of integrity, sustainability, and inclusivity.

Policy

ITCHL's Policy on Responsible Marketing covers:

1. What we market:

- a. To ensure that all marketing communications will be free from misleading claims.
- b. To accurately describe our products & services including providing relevant information as required by the applicable laws.
- c. To provide clear instructions on how to use our products & services, as may be required or appropriate.

2. How we market:

- a. To ensure that all marketing practices will comply with the applicable laws and regulations.
- b. To protect the privacy of customers and comply with applicable regulations pertaining to personal data, in case personal data is collected from customers.
- c. To carefully evaluate advertising platforms and media outlets and attempt to avoid platforms that have been established as promoting violence or pornography.
- d. To be mindful of the beliefs and practices of all religions and communities while developing advertising material.
- e. To strive to work with partners who adhere to applicable laws, regulations and standards.
- f. To provide training on responsible marketing principles, codes, and practices to relevant employees and partners.

3. **Who we market to:**

To strive that our marketing efforts are directed to appropriate audience, considering age, cultural sensitivities etc.

For additional information, refer to ITCHL's Policy on Product & Service Stewardship.

Governance and Implementation

- (a) ITCHL has appropriate systems and processes in place to ensure compliance with the Policy and with statutory provisions, as applicable, including processing of grievances for redressal. ITCHL through Strategic and Executive Management Committee ('SEMC'), will ensure progressive implementation of the Policy, and also communication of the Policy to the employees.
- (b) Compliance with the Policy will be regularly monitored and evaluated by the CSR & Sustainability Compliance Review Committee ('CSR & SCRC') of the SEMC. The report of the CSR & SCRC will be reviewed by the SEMC.
- (c) The CSR and Sustainability Committee of the Board will supervise the implementation of this Policy and will annually review the progress of its implementation.