



2019-20 GMR GROUP ETHICS & INTEGRITY AUDIT REPORT

ABSTRACT

The GMR Group Ethics & Integrity Audit Report was conducted with the aim to ascertain the efforts made by the organization in terms of 'Ethics' and 'Integrity'. The audit comprised of questions, which were divided into two situations i.e. the 'An ideal' scenario and the 'In-Reality' scenario. The two scenarios laid the foundation for the questions to be addressed during the audit. The participants were required to provide their response based on the two scenarios, which helped ascertain the contribution made by the existing E&I policies of the organization towards the interest and welfare of the employees. In addition to that, the audit also included activities such as a focus group, personalized interviews and a workshop, which helped get a better understanding of the working of the E&I program of the organization. On an average, 60% of the participants were of the opinion that the E&I program of the organization was effective and up to the mark. While the view of the remaining 40% reflected that certain areas of the program could be worked upon. Another major aspect of the audit was to help understand and take into consideration the views, opinions and feedback of the employees in terms of the E&I policies and programs. Therefore, on the basis of the questionnaire and the activities we can conclude that the existing E&I program of the organization to a large extent is working effectively.

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Over the years, the tone and culture of the policies and functioning of the organizations must be set in motion. Despite that, there are many rules that the employees may be aware of, which may not necessarily be mentioned in writing by the organization. Going ahead, it's such unwritten rules that lead to the grapevine effect, thus causing miscommunication and controversies within the organization. Therefore, it is imperative for organizations to create a mechanism that enables the effective development and creation of well-structured internal policies and other provisions to be adhered to by the employees of the respective organizations. While creating internal policies, the key aspect should be the 'Ethical' and 'Integral' values of both, the employees and the organization.

With setting off with the power plant project in Chennai to becoming the fourth largest airport developer in the world, the GMR Group has had a remarkable journey. Being a part of the infrastructure industry, the legal framework in such businesses is vast. Since there is a thin line between 'Ethics' and 'Law', it is advisable that organizations also focus on the internal policy creation and management. While implementing internal policies such as Code of Conduct, Prevention of Sexual Harassment at Workplace, Prohibition of insider Trading, etc, the interest of the employees of the organization should be considered as a priority.

The Ethics Audit was conducted at the GMR office between August 19th – 22nd to evaluate the functioning of the internal 'Code of Conduct' of the GMR Group. The audit assisted us towards a better understanding of the organization in terms of functioning and policy implementation. The audit has helped us determine both independently and collectively, the level of adherence to various policies by the employees and the organization. The audit further helped us in analysing the values set out and adhered with, by the organization in respect of the social culture at workplace. It has helped us gauge the opinions and feedback of the employees regarding the existing policies.

As part of the audit, we would firstly like to mention, the efforts of the E&I department of the GMR Group, which in our opinion has done a wonderful job in respect of the internal policies and training programs. In the times when most companies tend to neglect compliance of integral policies and provisions, we appreciate the GMR Group's endeavour towards adherence of the various internal policies and programs.

As part of the audit, our area of focus was the 'Ethics' and 'Integrity' aspect of the organization. Keeping this in mind, the audit was structured as questions, which were divided into two scenarios i.e. "*An ideal*" scenario and an "*In-Reality*" scenario. These questions were then

further divided into sets, whereby each set focused on a specific concept such as employee interest, compliance with law, etc. Accordingly, the participants were required to answer the questions on the basis of the two given scenarios (attached below as ‘Annexure 1’ is the questionnaire on the basis of which the audit was conducted).

Therefore, on the basis of the ratings given by the participants/ employees at different levels in the organization, we have accumulated a significant amount of data that has helped us recognize the opinions of the employees towards the organization and the E&I department. For better understanding of the data, we have collated all the information and created a consolidated excel sheet that provides an aggregate of the information. The audit was conducted keeping in mind specific areas of interest, in accordance with which, the questions were prepared. The following are some key observations of the audit:

- **Employee Interest:** Based on the response of the employees/ participants, it was observed that in comparison to the ideal scenario, there is a drop in the percentage of the in-reality scenario. The audit data revealed that the ideal scenario is in contravention to the opinion of the participants in an in-reality scenario. The participants expressed that the organization lacks focus on employee interest in times of need and difficulty.

Sr. No.	Statement	Ideal Rank	In Reality Rank
	Even in difficult times, employee interests are given importance.	70 %	49%

- **Downsizing:** The audit revealed that in reality, in comparison with the ideal scenario, there is a drop-in percentage of the opinion of the participants in the in-reality scenario as, the participants feel there is lack of support on part of the organization in respect of downsizing. In accordance with the data and the response of the participant, it is seen that the organization needs to work on developing a better mechanism to offer support and take into consideration, the sentiments of the employees, while making such crucial decisions.

Sr. No.	Statement	Ideal	In Reality

1	In case our company has to Downsize it takes care of the interests of the employees	75%	44%
2	In case our company has to Downsize it communicates effectively with employees taking care of their sentiments	74%	46%
3	In case our company has to Downsize it will do the same as the last option	71%	52%

- **Payments:** According to the response of the participants, the organization in an in-reality scenario tends to delay the payment to the suppliers/ vendors. It has been observed on the bases of the ratings made by the participants that there has been a drop in the percent of people that believe that the organization pays to the suppliers on time. As in comparison to the ideal scenario.

Sr. No.	Statement	Ideal	In Reality
1	Our organization gets the best bargain in every deal (we are the best negotiators in the industry) as every penny saved is more than every penny earned.	76%	56%
2	Our organization's credit dealings with their suppliers is the best in the industry / Our suppliers' value us for the credit deals that we offer that make both of us profitable.	73%	41%
3	Our organization takes pride in paying their suppliers on time. We never delay payments even to small suppliers.	79%	36%

- **Policies of the organization:** As per our observations the policies of the organization are made well aware to the employees except the whistle blower policy that has been rated as unclear and needs to be put light on as a considerate number of employees were either unaware about the policy or unclear as to what it meant.
- **Choose your preferred answer (Yes/ No):**

Sr. No.	Statement	Yes	No
7	Do you perceive a risk of retaliation if you blow the whistle?	44%	55%

Key findings on the basis of the ‘Focus Group’:

Concerns:

- Ethics Barometer Test:** In respect of the barometer test, it has been shared that some questions are not very clear and may cause confusion, thereby, resulting in a low score. However, this does not necessarily mean that there is a lack of ethics and compliance. Instead, it may be a result of lack of understanding or miscommunication.
- Employee opinion on the barometer test:** As per the questions set outcome, from a team, it was revealed that some participants are of the opinion that if one employee scores well on the test, such an employee is made to take the test on behalf of the rest of the team members, thus resulting in an overall high score for the organization. However, another group was of the opinion that neither was such practice being followed in their team, nor were they aware about such a process. Overall, the audit showed that most employees are familiar with the Ethics Barometer Test.
- Recognition and award:** There was a divided opinion about recognition and awards in respect of ethical compliance. While some participants look at being awarded or recognized for their efforts as a way of motivation. Other participants suggested that the ones not being awarded may consider the employee(s) receiving the award as a mole. Further, the participants not in favour of recognition and awards, believe that one need not be awarded for ethical compliance, as adherence to such provisions should by default, be the ideal approach of all the employees.

- **Lack of concentration on ethical issues:** As per the audit data, a considerable number of participants highlighted that money and other forms of bribes are major issues. In the midst of the monetary concerns, the organization tends to neglect crucial elements/ circumstances leading to other important ethical issues such as support extended by the organization towards the employees, focusing on employee interest, etc.
- **The Internal Complaint Committee (ICC):** The audit revealed that the current ICC of the organization consists of an all women board. This may be a concern as having a gender dominated committee may give an impression of the committee being biased. We suggest that the Committee should comprise of five members as having odd number of members would allow the Committee to freely carryout the decision-making process, without being stuck in a deadlock.
- **Lack of training at places far from the head office:** As per the participant response in respect of training programs, the participants showed appreciation towards the existing internal training programs conducted by the E&I department. However, the in-reality percentage of response revealed that there is lack of awareness and training in programs conducted at office-plant(s) situated at a significant distance from the head office. Some employees were of the opinion that the COC training in sites situated away from the head office could be made better.
- **Lack of communication:** The employees shared that while the E&I department is proactive, most communication is occasion centric such as during Diwali, etc. Whereas, in general the employees sense a lack of communication, which could be worked upon.
- **Investigation:** During the audit, the participants mentioned that there was a prolonged investigation that was carried out by the organization, wherein they felt there was undue delay in bringing the investigation to closure, thus sending out a wrong message to the employees of the organization.

Positives

- **Candid and enthusiastic employees:** Candour is a reflection of a '*speaking-up culture*'. The participants were candid in their response to the audit. While conducting the audit, we thought the employees were an enthusiastic lot, whereby they demonstrated a warm and healthy work culture.
- **E&I Department at GMR:** We highly appreciate the efforts of the E&I department towards ethical compliance and functioning of the organization. Moreover, the working department was well received and readily accepted by the employees of the organization.
- **Internal training programs:** The audit helped us discover that the organization has successfully conducted a commendable number of 120 + training programmes and learning modules, the feedback of which was reviewed by us and in our opinion deserves credit. In totality the training programs are well-designed and effectively conducted.
- **Friendly work environment:** We appreciate that the employees volunteering internally to execute videos for the program. This shows that the concept of teamwork and collaboration is present in the organization, which helps in building a friendly work-environment. Also, the content and quality of the videos were relevant and appropriate to getting the message across.

Areas of Improvement

During the audit, the participants were also given the opportunity to share their opinions, views and feedback about the existing policies and other provisions of the organization. It must be noted that though this feedback received from limited members i.e. the participants of the E&I Audit, it is important that whether single or multiple feedbacks, the organization should pay heed to each concern and look at it with the perspective to learn and improve further. The following are some of the suggestions that we have put together on the basis of the feedback from the participants and our findings during the audit:

- **Detailed inquiry:** Before the organization draws a conclusion to any situation, it is recommended that a thorough inquiry should be conducted and only after proper understanding of the situation, the organization should take a decision.
- **Enhance policies for protection against sexual harassment and mental agony:** Emphasizing the need for more stringent policies, the participants suggested that the organization should focus on implementing policies which ensure strict action against corruption, any form of harassment; irrespective of 'who is who' i.e. without discrimination as to the aggrieved employee and the employee against whom the complaint is made.
It is pertinent to highlight that a concerning feedback from the employees was regarding an undercurrent of male chauvinism in the workforce. Thus, leading to discriminatory behaviour by men towards women employees. Such feedback needs to be given top priority by the organization.
- **Whistle-blower policy:** In the recent times, employees are seen more willing to disclose details pertaining to a fraud or wrongdoing, so much that the corporate whistle-blowers are being referred to as the new 'heroes' of the nation. Therefore, it is essential that the organization focuses on maintaining a policy that enables the employees to come forward and reveal cases of misconduct and fraud in the organization.
- **Using social network platforms for work:** Making use of '*WhatsApp Groups*' to communicate about projects, assignments or other work-related discussions may also

be seen as a concern. Normally, the accountability/ traceability of data becomes difficult while using such platforms for discussions. Therefore, we would suggest that this issue should be worked upon and resolved internally at the earliest.

- **Work-culture:** A common feedback from most participants was that the organization should promote and incorporate a transparent, objective and professional work culture.
- **Frequent sessions on importance of ethics:** It is advisable to conduct short but regular seminars, talks or programs, whereby interactive sessions are held by the organization, discussion the importance of ethics and the consequences related to its violations. This will help the employees be involved and updated with the ethical norms of the organization and being updated and aware of the consequences in case of violations of any of the provisions. The organization may also consider quizzes or brainstorming sessions on E&I, to spread awareness on the subject.
- **HR policies:** It was observed that during the hiring process, there is lack of communication on part of the HR department in respect of introducing the organization's E&I policies and programs to the prospective candidate.
- **Seminars & training:** We suggest that the organization should conduct seminars and training programs about ethics at regular intervals and also take that opportunity to explain about the problems occurred on account of violations of rules, if any along with examples. Such practice can help the employees in better understanding and to work more efficiently at their respective workplace.
- **Lack of flexibility:** On account of stringent approach of the organization, the employees tend to feel lack of support from the organization. For e.g. – An employee taking short breaks in between work hours to pursue his passion for writing. However, the rules laid down by the organization do not permit the employees to indulge in personal activities. We agree that making use of official work hours to indulge in one's passion or hobby, may not be in context with the policies of the organization. Nonetheless, we would suggest that if not encourage, the organization can at least

support an employee's passion as long as there is no conflict of interest. This will help reflect on supportive work culture and help in making it a great place to work at.

- **Lack of trust:** More often than not, many employees refrain from recommending vendors, who might be cost effective. This is because, they fear being misunderstood for having an ulterior motive behind such suggestion(s). Hence, the organization may consider incorporating a well thought and planned process, which may enable employees to put forth their suggestions/ recommendations without any hesitation.

Recommendations:

- **Internal communication:** We recommend that the organization works upon improving its internal communication. Maintaining transparency and being vocal with the employees about decisions pertaining to the organization. In fact, the opinion of the employees should also be taken into consideration while implementing new policies and procedures. Having a well-structured mechanism in place for internal communication, gives the employees a sense of trust and belief in the organization and feel that their opinion also matters to the organization.
- **Internal Complaints Committee (ICC):** In the report, ICC refers to the Internal Complaints Committee. In accordance with the Prevention of Sexual Harassment at Workplace Act, 2013 (POSH), the committee shall consist of minimum four members. The audit revealed that the current ICC of the organization consists of an all women board. This may be a concern as having a gender dominated committee may give an impression of the committee being biased. We suggest that the Committee should comprise of five members as having odd number of members is recommended, as that allows the Committee to freely carryout decision-making process, without being stuck in a deadlock. Though this committee does not fall within the purview of the E&I department, we suggest that the organization considers making it a part of the above department.

- **Implementing a more stringent Prevention of Sexual Harassment at Workplace (POSH) policy:** During the audit, one of the participants gave their feedback on the presence of male chauvinism in the organization. Although the issue was highlighted by one, it is important that each feedback/ recommendation is taken into consideration to maintain a safe and well-protected work culture. We would suggest enhancing of the existing POSH policies, which can help safeguard the rights of not just the women but of all the employees, in general.
- **Training programs at site/ branch offices:** In respect of site/branch offices situated at significant distances, a mechanism needs to be put in place which enables a proper training program at sites which are away from the head office. As important as it is to train the employees at the head office. It is equally essential to conduct regular training of the employees working at various sites and other locations of the organization, which may be situated far away from the head office. The organization should emphasize more on training the head of departments and/ or the site managers at locations so that they can train their teams.
- **Investigations:** It is suggested that once an investigation is put into motion, all efforts must be made to resolve the issue/ dispute and the same is brought to closure at the earliest.
- **Hiring process:** It is advised that the organization looks into intricacies and ensures that all policies pertaining to the organization in relation with employees are specifically disclose to the employees, preferably at the time of the hiring process. During recruitments, talking about the ethical practices followed by the organization, demonstrates that value that the organizations upholds in terms of ethical practices.
- **Implement supportive internal policies:** We suggest that the organization should work upon establishing more supportive internal policies, which are structured keeping in mind the interest and welfare of the employees. For eg. the internal Code of Conduct of the organization should be altered and designed in a way whereby, it not only focuses on development of the organization but also works upon ensuring that the employee interests are taken care of.

- **Benchmarking:** Benchmarking refers to incorporating certain practices that contribute towards improving the existing E&I policies and programs in the organization. The aim of the organizations should be to get recognized amongst the *'World's Most Ethical Companies'*. Here, we would like to acknowledge the efforts made by *'Tata Steel'* and *'Wipro'*, who have emerged as the only two Indian companies to be recognised on this world list.

The following are some of the common best practices an organization can incorporate to help separate the organization's *'good ethics program to a great one'*.

1. A common organizational practice of the business industry is effectively conducting/celebrating an association day such as the Central Vigilance Commission (CVC) Week conducted by the Government to fight corruption and ensure integrity in public administration. We suggest the GMR Group to consider the implementation of the ***Compliance and Ethics Week (CEW) or an Ethics Day.***

As pioneers in the field of ethics and compliance, Ethicsindia – A Legasis Company offers a customised program, whereby we help organize and conduct the CEW or Ethics Day at all locations of the organization. Our customized CEW program is designed with the objective of bringing ethics and compliance into the forefront and making it an integral part of the work culture.

The program helps build a well-structured mechanism for understanding and adhering to compliance-based roles and responsibilities, ensure minimum loss of work-hours and enhanced productivity, strategic planning, resource management and much more.

It pertinent to note that our CEW program is curated in accordance with the organization's internal Code of Conduct and other polices.

The following topics broadly cover some of the activities organized and conducted by us for such programs/ trainings:

- Activities involving family participation such as contests, quizzes, etc;
- Awareness programmes – Prevention of Sexual Harassment (POSH), Anti-Bribery and Anti-Corruption (ABAC), Board sensitization;
- Revisiting existing policies and restructuring to introduce up-to-date legal knowledge; and

- Gauging employees' concerns to facilitate productive exchanges with senior management.
2. **Proactive:** It is important for organizations to be proactive rather than being reactive i.e. being in control rather than just responding to situations. Some companies such as Volkswagen Group and Siemens, were seen enhancing their respective E&I policies and programs only pursuant to their violations coming to light. Organizations can act in a proactive way when
 - A violation has already been committed in respect of the E&I policies and programs. In such situations, if the organization is proactive, it can work towards adherence of ethics from the moment it becomes aware of non-compliance or violation;
 - Being vigilant from the very start and working towards sustaining it, which can be achieved by ways of conducting regular trainings, workshops, ethics audit, etc, which ensures ethical compliance.
 3. **Maturing and advanced programs:** As organizations develop mature programs, and they adopt a more programmatic approach to building an effective curriculum, they are better able to assess the right balance among full-length courses, micro learning and communication materials. They build stronger, more effective programs with far fewer gaps. The report has revealed that training clearly can also help shape a better culture, increase productivity, attract and retain better people and reduce employee cynicism.
 4. **Ethics champion:** What every organization needs is an '*Ethics Champion*' i.e. recognizing a leader, who has championed the cause of Ethics in their respective organizations and in their industry. another practice that has been carried out by Tata Group is ethics championship. In this practice the ethics champion holds an informal position in the organization in addition to the respective position he/she holds. It is worth giving credit to the Tata Group on their Ethics Champions program, which has been introduced as the first touchpoint for frontline employees to spread awareness and dilemma clarifications.
 5. **Director of Justice (DOJ):** Every organization should review its E&I program in accordance with the below 3 (three) questions:

- Is the corporation's compliance program well designed?
- Is the program being applied earnestly and in good faith? In other words, is the program being implemented effectively?
- Does the corporation's compliance program work in practice?

6. **Ethics officer:** Best practices are also when the Head of the ethics committee reports directly to the Board. Therefore, it is advisable for organizations that alongside an E&I department, to have a system in place for reporting whereby in case of any serious doubt or issue about ethics, the employees of the organization can reach out to the Ethics Officer or the Head of Ethics, who is more involved in the process of ethics and integrity.

To further elaborate the concept of benchmarking, we would like to highlight some of the key findings from *the Navex Global – 2018 Ethics and Compliance Training Benchmark Report* –

- Technology alone does not deliver the best program results.
- For a program to perform at its best, all employees of the organization must be aligned to the organization's goals and aspirations.
- Despite organizations working to improve their training programs, results of the report indicate training shortcomings on key topics central to how the organization does business.

Therefore, it is observed that the path to eliminating gaps in training, appears linked to program maturity. It is pertinent to note that according to the survey More than any other element of the compliance ecosystem, training was identified as the program component that prevented misconduct and ethical violations over the past three years.

Additional points:

- In comparison to most other Indian companies, the management and the working of the organization is above commendable. We would like to appreciate the efforts of the organization for their well-designed policies and program. Further, we would also like to give credit to internal training programs, which in our opinion are well drafted and effectively conducted.
- Compliance and Ethics needs to be brought to the forefront and needs to be made an integral part of the company's culture as it will help build reputation and mitigate risk. A week or even a day to celebrate ethics at all locations of the organization such as an 'Ethics Day' to reflect on the organization's commitment on ethics and compliance. This will help strengthen the corporate moral compass and align it with today's ethical standards. A common industry practice is conducting/ celebration of association day. For instance, as the Government conducts the Central Vigilance Commission (CVC) week.
- While most companies fail to put in place a social media policy, the efforts of the organization are not gone unnoticed. We appreciate the GMR Group incorporating a social media policy. As an addition, we have suggested a few modifications to the existing policy (attached as '**Annexure 2**' is the GMR Social Media Policy along with our suggestions).
- Keeping in mind the Prevention of Corruption (Amendment) Bill, 2018, in case the Amendment Bill is passed, the organization may need to alter the existing anti- bribery and anti-corruption policies, in accordance with the latest provision. The existing policies can be fine-tuned with minor alterations.

Annexure 1

ETHICS QUESTIONNAIRE

The Ethics framework is designed to cover six broad dimensions

1. Purpose
2. Congruence between Organizational Practices & Branding of Product/Services
3. People Practices
4. Financial Practices
5. Compliance Practices
6. Responsiveness to Crises

These dimensions encompass interests of three major stakeholders

- 1) Customers
- 2) People: Employees
- 3) Community

Instructions:

Please rank each set of items in order of their importance or frequency of occurrence in your organization.

****Ideal refers to what you prefer. * In Reality is What's happening in your organization***

Rank in order of importance:

1 Most important, 2: Somewhat Important 3 Least Important.

***Ideal i.e. what you prefer. * In Reality, i.e. What's happening in your organization**

Sr. No.	Statement	Ideal Rank	In Reality Rank
1	The ultimate goal of my organization is to be profitable.		
2	Even in difficult times, employee interests are given importance.		

3	The ultimate goal of my organization is to satisfy customer needs.		
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**Rank in order of frequency of occurrence 1 Almost Always 2: Often 3: Occasionally
4: Rarely, 5: Never**

Sr. No.	Statement	Ideal	In Reality
1	Our organizations people practices are fair and purely based on merit.		
2	Our organization provides women with equal opportunities for hiring and promotion as men (Our Organization has practices and processes to ensure diversity of employees in terms of gender, race, disability)		
3	In our organization the physically challenged have sufficient opportunities for hiring and promotion as others.		

Rank in order of frequency of occurrence 1 Almost Always, 2: Often, 3 Rarely to never

Sr. No.	Statement	Ideal	In Reality
1	In case our company has to Downsize it takes care of the interests of the employees		
2	In case our company has to Downsize it communicates effectively with employees taking care of their sentiments		
3	In case our company has to Downsize it will do the same as the last option		

Rank in order of frequency of occurrence 1 Almost Always, 2: Often, 3 Rarely to never

Sr. No.	In case a harassment complaint is lodged against a senior member of the organization	Ideal	In Reality
1	A discrete investigation will be conducted to understand the merit of the case before further action to avoid reputational risks to the organization.		
2	Immediate action is taken as soon as the complaint is raised and an Inquiry committee is set up to deal with it		
3	Negotiations and settlement will be discreetly organized as a more appropriate way for all parties concerned- complainant, the senior manager involved and the organization.		

Rank in order of frequency of occurrence 1 Almost Always, 2: Often, 3 Rarely to never

Sr. No.	When a financial malpractice complaint is lodged against a senior member of the organization	Ideal	In Reality
1	A discrete investigation will be conducted to understand the merit of the case before further action to avoid reputational risks to the organization.		
2	Immediate action is taken as soon as the complaint is raised and an Inquiry committee is set up to deal with it		
3	Negotiations and settlement will be discreetly organized as a more appropriate way for all parties concerned- complainant, the senior manager involved and the organization.		

Rank in order of frequency of occurrence 1 Almost Always, 2: Often, 3 Rarely to never

Sr. No.	Statement	Ideal	In Reality

1	Our organization gets the best bargain in every deal (we are the best negotiators in the industry) as every penny saved is more than every penny earned.		
2	Our organization's credit dealings with their suppliers is the best in the industry / Our suppliers' value us for the credit deals that we offer that make both of us profitable.		
3	Our organization takes pride in paying their suppliers on time. We never delay payments even to small suppliers.		

Rank in order of frequency of occurrence 1 Almost Always, 2: Often, 3 Rarely to never

Sr. No.	Statement	Ideal	In Reality
1	We follow all regulations (taxes/permissions) diligently to avoid any risks or fines in future.		
2	We are excellent in finding legally permissible ways to minimize taxes and other regulations that delay our work.		
3	We “manage” taxes and other government regulations to avoid litigations.		

Rank in order of frequency of occurrence 1 Almost Always, 2: Often , 3 Rarely to never

Sr. No.	Statement	Ideal	In Reality
1	Our organization takes product/service complaints by customers seriously. We take immediate action to rectify and to provide them a happy experience.		
2	Some percentage of customer dissatisfaction is industry norm. Our organization does its best to keep their customer complaints to the minimum.		

3	Our organization has standardized processes and trained customer care representatives to handle customer complaints.		
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Choose your preferred answer (Yes/ No):

Sr. No.	Statement	Yes	No
1	The company has a clear gifts and hospitality policy		
2	The company has a clear conflict of interest policy		
3	The implementation of the Conflict of Interest policy is good in our company		
4.	We have been trained about the Conflict of Interest policy of our company		
5	We are aware of Anti bribery and corruption rules of GMR		
6	There are ample mechanisms to blow the whistle in GMR		
7	Do you perceive a risk of retaliation if you blow the whistle?		
8	There is ample communication in case of action taken in disciplinary cases		
9	Fair action is taken on whistle blower complaints		
10	Fast action is taken in disciplinary cases		

Any Comments:

Rank in order of frequency of occurrence 1 Always, 2: Mostly 3 Often, 4 Rarely 5. Never

Sr. No.	Statement	In Reality

1	The E&I department is approachable	
2	The E&I department is effective	
3	The E&I department is fair and transparent	
4	Is there sufficient communication about E&I programs and policies.	

ANY SUGGESTIONS FOR IMPROVEMENT OR COMMENTS

Annexure 2

Guidelines on the use of Social Media

Policy:

1. PREAMBLE

In today's day and age, social media has become an intrinsic part of everybody's life. Thus, creating a demand for a prescribed set of guidelines to be adhered by the GMR Group employees, in respect of content shared on social media. In order to ensure that work ethics are upheld, a clear demarcation between one's personal and professional social media presence must be maintained. Therefore, the GMR Group trusts and expects its employees to adhere with and practice the present Social Media Policy ("Policy") in letter as well as spirit towards upholding the GMR Values and Beliefs and avoid any disrepute, embarrassment or misrepresentation to the organization.

For the purpose of this Policy, the term "**social media**" includes but is not limited to the internet-based communication channels on websites as well as applications (apps) used for community-based input, interactions, content-sharing and collaborations. It is an online platform that enables users to participate in social networking.

Some examples of social media which are covered under the Policy are as follows:

- Media Sharing - YouTube, Flickr etc.
- Blogging/ Micro-blogging – WordPress, Blogger, Twitter, Whatsapp etc.
- Social Networking – Facebook, MySpace, LinkedIn, Ning etc.
- Document and Data Sharing Repositories Scribd, Slide Share, Socrata etc.
- Social Bookmarking - Delicious, Digg, Reddit etc.
- Widgets - AddThis, etc.

2. OBJECTIVE

More often than not, the lines between public and personal, and private and professional are blurred on social networks online. While we all undeniably enjoy the liberty of voicing our personal opinion on various online platforms, it is pertinent to maintain ethical conduct on the same. The freedom of expressing one's views on social media meets a corresponding duty towards other members of the online platform as well as the professional organization one is associated with. Hence, to participate in social media activities such as posts, discussions, opinions, etc, one must understand what is recommended, expected and required in respect of work ethics, whether at work or on your own time.

3. DO'S AND DON'TS OF USING SOCIAL MEDIA:

CONFIDENTIALITY: One must at all times, avoid discussing any GMR Group related information that is or may be considered confidential and falls within the category of trade secret(s), potential business strategy(ies), etc. Any discussion pertaining to sensitive, proprietary, or classified information in respect of the company, is strictly discouraged. Further, this rule applies to those social media platforms where password or other privacy controls can be implemented.

IDENTITY: One must ensure transparency and clarity as regards your identity on social media and refrain from using anonymity and pseudo-names to carry out wrongful acts in terms of this Policy as well as under law. It must be ensured that the views expressed are rational, civil and not offensive to both, the GMR Group as well as other members/ participants of the social media platform.

AUTHORITY: The GMR Group employees shall refrain from posting personal comments in matters that are sensitive or beyond the purview of public speculation (for e.g. court cases wherein the GMR Group is a party). One must further abstain from posting comments that give an impression that one is posting on behalf of the

company or have been authorized by the GMR Group to post on social media platform(s). At no time whatsoever, shall any employee give the impression that he/she is speaking on behalf of GMR Group, unless specifically authorized to do so.

RESPONSIBLE BEHAVIOR: Every social media user/ member associated with the company must ensure polite, discreet, respectful and sensible conduct online. Further, one shall refrain from making any misleading, baseless and irrelevant comments that can directly injure other members of social media or may be considered offensive or inflammatory. For instance, the employees shall strictly abstain from any defamatory or misleading comment(s) aimed at a particular individual, an individual's race, ethnicity, nationality, sexuality, religion, physical disability or in the context of any country. The employees are discouraged from engaging in vulgar or abusive language, personal attacks of any kind, or offensive terms targeting individuals or groups.

ACCURACY: One must refrain from making speculative, baseless and unfounded comments or rumours that can offend other users/members on social media.

PRIVACY: It is essential that we respect the privacy of others and therefore, one shall abstain from sharing any personal information about other individuals. As regards personal details, one must constraint themselves from sharing such information on social media unless one expressly wishes to publicize personal details. Also, the privacy of other members of social media shall not be violated and there shall be no misuse of information shared by them, in the form of pictures, post, etc. Moreover, one must not post details about any of GMR's customers or business partners, including on professional networking sites such as LinkedIn.

MAKE UP FOR YOUR MISTAKES: In case of an error made while sharing any information on social media platform(s), the respective individual must be the first one to voluntarily admit the error, correct it at the earliest and also specify that a modification has been made.

DON'T LET SOCIAL MEDIA ACTIVITIES IMPACT WORK: It is essential that the employees prioritize work over social media activities and ensure that work commitments are not affected.

COMPLIANCE: At all times, one must adhere to and comply with the law, including but not limited to law concerning intellectual property rights, information technology, and basic tenets of civil and criminal law.

GMR GUIDING PRINCIPLES FOR SOCIAL MEDIA USAGE

In addition to the abovementioned Dos and Don'ts, the GMR Group encourages its employees to adhere to the following guidelines in their day-to-day conduct over social media:

Be aware of your association with the GMR Group on social media:

If one represents themselves as a GMR employee, then the employee must be ensured that the respective profile and related content (even if it is of a personal and not official in nature) is consistent with their present position as a GMR professional, conforming to the existing GMR's Values and Beliefs and the GMR Code of Business Conduct & Ethics. If any employee mentions his/ her official designation at GMR, then due care must be taken to use only GMR approved designations. While representing the GMR Group or giving such an impression on social media, one must understand that such representations shall not be interpreted to be private/ personal in nature.

In addition, it is advised that the employees add a disclaimer to their social networking profile, personal blog, or other online presence which clearly states that the respective employee is writing for themselves in an independent capacity and not on behalf of the company. Therefore, it is imperative to convey that the opinions or views expressed are private in nature and do not represent the views of the GMR Group.

Usage of GMR's logo and/or any information relating to GMR:

Employees are obliged to seek prior written approval from the company before using its logo and/ or sharing any information relating to the company or any information in areas that coincide with their employment at the company. Further, the employees are discouraged from copying, digitizing, altering or distributing any part of a copyrighted work belonging to the GMR Group, without first obtaining written permission from the copyright owner.

Compliance with the GMR Values and Beliefs and GMR Code of Business Ethics:

The employees of the company are bound by the terms of conditions covered under the documents issued by the GMR Group.

Liability for misrepresentation, misleading information, defamatory contents:

The GMR Group reserves its right to take action against any employee involved in sharing or circulating information on social media, which may be inaccurate, misleading, defamatory or confidential in nature. The company also reserves the right to initiate action against any employee who is seen derogating the GMR Code of Business Conduct & Ethics, Employment Contract and the Employee Manual Handbook.

The disciplinary action will be undertaken in accordance with the Code of Business Conduct and Ethics, issued by the GMR Group and at its sole discretion, with all fairness. The GMR Group also reserves its right to resort to other remedies available to it under law.

Suggestions:

Usage of official GMR email for personal use: The email address given to employees is for official use only. Therefore, the official GMR email shall not be used for a personal blog, or when posting on social media sites.

When facing a tough situation: Apply the company's principles of business conduct, review the company policies, review legal requirements and then decide what to do. If you still need some help, do not hesitate from reaching out to the Human Resources representative, or the Legal Department.