

## Attachment 11

### H3.4 Anti-Corruption

**We have internal accounting and auditing procedures related to anti-corruption**

#### **How corruption is monitored**

As part of our Internal Control and to monitor corruption, we have dedicated members with different job responsibilities to procure/order/receive from suppliers/handle cash. HACCP officer and Chef check on suppliers/quality and delivery mode. Purchase officers check that pricing is not fluctuated and that purchases go through a serial purchase order. Segregation of duties at every level is important – vendors only deal with the Purchasing Manager , and the person who places order does not receive goods or & prepares GRN ( Goods receiving Note) and the person preparing the payment does not place the order or receive the goods.

These cross controls avoid corruption are verified as part of the annual audit process by our external auditors who spot check during the interim & final audits.

Vendors are only accepted if undertakings are signed that they should deal only with our Purchasing dept. with full transparency.

Further, all Gifts received from Vendors have to go through HR Dept Head who would exercise his discretion on dealing with items according to the hotel policy for Gifts & Gratuities.(APP80) Staff are checked upon arrival and when leaving premises by trained security to see no unlawful goods are being carried.

Periodic checks on purchase officers, sales contracts, front office personnel and where cash is handled are a regular SOP. An audit report is submitted to the CEO in case of loopholes. To date we have had one dismissal due to Cash Shortage and another on misappropriation of IHG Rewards Points. This verifies that we honour our code of conduct which is explained at induction orientation. (APP38/39)