



Responsible AI Policy

Purpose:

Mahindra Holidays & Resorts India Limited (hereby referred to as “MHRIL”) is committed to the responsible, ethical, and secure use of artificial intelligence (AI). This Responsible Artificial Intelligence Policy sets out the principles governing the development, deployment, and use of AI systems across the organization to ensure trust, accountability, transparency, sustainability, and compliance with applicable laws and regulations.

This Policy is intended to supplement, and be read together with, the Company’s other applicable policies, standards, and procedures, including those relating to information security, data protection, risk management, technology governance, human resources, and compliance.

Scope:

This policy applies to all AI systems developed, procured, deployed, or used by the Company, including those developed internally or provided by third-party vendors, across all business functions and geographies.

Policy Principles:

- **Fairness and Bias Mitigation:**
The Company is committed to reducing the risk of unfair bias in the use and development of AI systems. Reasonable steps are taken to identify, assess, and mitigate potential bias in AI models, datasets, and outputs throughout the AI lifecycle, including through periodic reviews where appropriate to the nature and risk of the use case.
- **Human Oversight and Accountability:**
Critical or high-impact AI-driven decisions are subject to appropriate human oversight, with mechanisms in place for timely review, intervention, override, or escalation where required. The Company ensures that humans remain actively involved in decision-making loops for all critical use cases. Clear accountability is established for outcomes produced by AI models and tools, with defined ownership, roles, and responsibilities at relevant management levels to ensure oversight. Human intervention mechanisms are maintained to review, challenge, and, where necessary, override AI-driven outcomes.
- **Transparency and Explainability:**
The Company promotes transparency in the use of AI. Where feasible, AI-generated outputs and AI-assisted decisions are identifiable or labelled, and explanations of AI outcomes are provided to relevant stakeholders to support understanding and trust.

- **Defined Boundaries for AI Use:**
Clear boundaries are established for what AI systems are permitted and not permitted to do. AI systems are designed and used strictly within approved use cases and risk controls. AI systems may be developed, deployed, and used only for defined and approved business purposes, and not beyond the approved scope, context, or user permissions. Appropriate guardrails apply to higher-risk use cases, including use involving sensitive data, external-facing deployment, automated actions, or decisions with material impact. Material changes to approved AI use cases shall be subject to appropriate review and control.
- **Data Privacy in AI Development and Deployment:**
The Company is committed to protecting personal data and other sensitive information in the development, testing, deployment, and use of AI systems, in accordance with applicable law and internal data protection standards.
- **Cybersecurity of AI Systems:**
The Company endeavours to maintain appropriate technical and organisational measures for safeguarding AI systems, models, data, and supporting infrastructure. Access to sensitive AI capabilities, models, tools, and related systems is subject to appropriate access controls, consistent with business need and risk.
- **Sustainable and Environmentally Responsible AI:**
The Company seeks to minimize the environmental impact of AI by promoting energy-efficient AI systems and

responsible computing practices. This includes encouraging the use of infrastructure, data centers and models with a low ecological footprint, including those operated by third parties, and taking sustainability considerations into account as part of AI-related decision-making.

- **Monitoring and Review:**

The Company endeavours to maintain appropriate mechanisms to monitor relevant AI systems for continued functionality, reliability, and performance over time, and to take corrective action where required. The Company may also assess its AI governance practices against relevant standards, frameworks, certifications, or assurance benchmarks, as appropriate, including in relation to sustainability impact.

- **Grievance Redressal and Escalation Mechanisms:**

Where applicable, the Company shall maintain appropriate channels through which concerns, complaints, grievances, or appeals relating to AI-driven decisions may be raised and reviewed in accordance with applicable internal processes.

- **Prohibited AI Practices:**

The Company does not develop, deploy, or use AI systems that engage in manipulative behavior, exploit human vulnerabilities, enable social scoring, or involve unauthorized biometric identification or surveillance, in line with applicable legal requirements and emerging regulatory expectations. The Company may also restrict or prohibit other AI use cases based on applicable legal, ethical, security, or risk considerations.

- **Governance and Implementation:**

This policy is supported by internal governance mechanisms, procedures, and training programs to ensure effective implementation. Employees involved in AI development, use, or oversight receive training on ethical AI use, data protection, and security responsibilities. More detailed requirements, controls, and processes may be set out in supporting standards, procedures, and guidance issued by the Company from time to time.

Manoj Bhat
Managing Director & CEO

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THANK YOU!