

Diversity, Equity and Inclusion (DEI) Policy

The concept of Diversity, Equity and Inclusion encompasses acceptance and respect. It entails unifying a heterogeneous workgroup in a safe, positive and nurturing environment. It involves understanding each other and moving beyond simple tolerance to embracing and celebrating the rich dimensions of diversity contained within each individual. These results in a collaborative and all-inclusive business operational model aimed at promoting growth, profitability, and employee engagement.

This policy also takes into consideration an anti-discrimination approach.

Diversity, Equity and Inclusion includes, but are not limited to gender or gender reassignment, marital status or civil partnership, having or not having dependents, maternity, religious beliefs, political opinions, race, caste, colour, age, nationality, culture, language, ethnic, and indigenous origin, socio-economic status, physical appearance, people living with disability and special needs, migrants or refugees (based upon legal working rights as per legal law) and sexual orientation. These are known as protected characteristics.

Inclusion is providing equal opportunities in employment and avoiding unlawful discrimination in employment and against customers.

The company commits its support to the principles and practice of equal opportunity in employment and understands that it is the duty of the organization and all its employees to ensure that diversity and inclusion are a part of their everyday business. The company believes that Diversity, Equity and Inclusion in the workplace is good management practice.

Objective

The company is committed to fostering a diverse, equitable, and inclusive workplace where every individual is valued, respected, and provided with equal opportunities.

The company does not discriminate directly or indirectly in recruitment or employment because of any of the protected characteristics (mentioned above). The aim of this policy is to set guidelines for promoting equal opportunity in employment and in the business conduct irrespective of any individual differences.

Applicability

This covers all employees of the company and its affiliates and subsidiaries (“Employees”). This would also apply to any part-time or full-time Consultants or Contractual workforce including Interns.

Key features

- The company would promote diversity, equity and inclusion within recruitment, retention, and promotion, and would monitor regularly to ensure accountability. All company practices (including but not limited to recruitment, role rotation, performance management or learning and development) would be in line with the company’s policy on Diversity, Equity and Inclusion.
- The company aims to create a conducive work environment that encourages employees from diverse backgrounds, perspectives, and skills to collaborate and work together towards a common objective.
- Confidentiality of an employee’s gender identity shall be maintained, and no individual shall be forced to disclose their gender identity unless required by law. To create an inclusive and comfortable environment for transgender employees, to the best of its abilities the company shall:
 1. Provide gender-neutral or unisex restrooms.



2. Ensure safe and accessible workplace facilities for transgender employees.
 3. Offer hygiene and wellness amenities tailored to the needs of transgender persons.
 4. Implement measures for workplace safety and security.
- The company aims to create a work culture that promotes employees to their full authentic self, by voicing their opinions and ideas and considering their contributions to be imperative in the success of the organization.
 - All employees are treated with respect and the company value system should not be compromised regardless of individual differences.
 - Potential employees would be selected purely on merit, experience, capability, job requirement and any other parameters that may be specified in the hiring process.
 - Employees who are differently abled or become differently abled in the course of their employment should inform the company. They may also wish to inform the company of any reasonable adjustments to their employment or working conditions which they consider to be necessary or which they consider would assist them in the performance of their duties. To create an inclusive and comfortable environment for differently abled employees, to the best of its abilities the company shall:
 1. The company will provide necessary facilities and amenities to enable employees with disabilities to effectively discharge their duties.
 2. Workspaces will be designed to be accessible and barrier-free for persons with disabilities.
 3. The company will identify and maintain a list of posts suitable for persons with disabilities and ensure their recruitment aligns with the prescribed standards.
 4. The recruitment process for persons with disabilities will be inclusive and non-discriminatory.
 5. Post-recruitment and pre-promotion training will be provided to enable skill development and career growth.
 6. Persons with disabilities will receive preference in transfer and posting, special leave, and priority in the allotment of residential accommodation, if applicable.
 - Disability and personal or home commitments would not form the basis of employment decisions.
 - The company is committed to providing equal pay for equal work, ensuring that employees performing the same work or work of a similar nature are compensated fairly regardless of gender. In accordance with the Equal Remuneration Act, 1976, work of similar nature refers to work requiring similar skill, effort, responsibility, and working conditions.
 - The company promotes diversity and equality in the workplace, and compliance with all applicable laws while encouraging the adoption of international best practices.

Pay Audit & Corrective Action Guidelines

To ensure pay equity and compliance with DEI commitments, the company will conduct regular pay audits using a structured methodology.

1. Frequency of Pay Audits
 - A comprehensive pay audit will be conducted annually to assess wage disparities across gender, race, disability status, and other protected characteristics.
 - Interim reviews may be conducted as necessary based on changes in employment trends or regulatory requirements.
2. Methodology for Pay Audits
 - Data Collection & Analysis: Compensation data will be collected for all employees, categorized by job role, experience level, and demographic factors.
 - Comparative Analysis: Salaries will be evaluated to identify any discrepancies that cannot be justified by performance, experience, or responsibilities.



- **Benchmarking:** Compensation structures will be compared internally categorized by job role, experience level, and demographic factors. The company may also compare compensation structures against industry standards and external benchmarks.
- **Confidentiality & Compliance:** The audit process will maintain confidentiality while ensuring compliance with legal and regulatory requirements.

3. Corrective Actions

- If pay gaps are identified, the company will take necessary steps to correct disparities through salary adjustments, policy modifications, and process improvements.
- Employees affected by unjustified pay gaps will receive fair adjustments in a timely manner, aligned with the organization's compensation structure.
- The company will provide training to managers and HR personnel on equitable pay practices to prevent future disparities.

Record Maintenance

- The company will maintain and update records for gender-wise remuneration details to ensure transparency and compliance with the law.
- Regular reviews will be conducted to assess the nature of work performed by employees to ensure that equal pay is provided for equal work and that no unjustified discrepancies exist.
- All records will be securely stored and periodically audited to meet compliance requirements and uphold the organization's commitment to pay equity.

Responsibilities

Although Human Resources department is the guardian of Diversity Management within the organisation, each employee plays an active role in maintaining a healthy work environment. The Human Resources department will also be responsible for conducting training sessions to promote awareness and sensitization.

1. Employee's Duties

All employees have a responsibility to play a part in eliminating discrimination, promote and uphold the DEI policy as follows:

- Employee should support and implement the practice of Diversity, Equity and Inclusion in their daily work.
- Employees should understand that breach of DEI policy, as misconduct, could lead to disciplinary proceedings.
- Employees can be held personally liable as well as, or instead of, the company for any act of discrimination. Employees who conduct serious acts of harassment may be guilty of a criminal offense.
- Employees should note that acts of discrimination, harassment, bullying or victimisation against other employees or customers are disciplinary offences and would be dealt with under the company's Disciplinary policy.
- Employees should acknowledge the similarities and the differences between the persons in contact with company like colleagues, managers, vendors, clients for creating a starting point for understanding and appreciating diversity and spreading awareness of various behaviours and barriers that may negatively impact a diverse work environment.
- Employee should not discriminate on the basis of race, indigeneity, rurality, disability and sexual identity, amongst other characteristics.

2. Reporting Manager and Leadership Team Duties

Reporting Managers and Leadership Team have a responsibility to promote and uphold the DEI policy as follows. This would be to:

- Promote inclusive leadership by actively seeking out and considering different perspectives of employees in decision making processes.
- Practice and demonstrate inclusive behaviour within the team, acting as role models.



- Promote diversity, equity, and inclusion by progressive portrayals of equal opportunities that extend beyond gender, race, age, ethnicity or any other protected characteristics.
- Encourage an open culture with good communication channels based on open dialogue and active listening.
- Encourage ownership and empower the team to make decisions.
- Promote inclusion by liberal communication and providing proper guidance to build trust and confidence typically amongst new employees.
- Leadership Team is responsible for setting the tone and ensuring Diversity, Equity and Inclusion practices are integrated into the company's strategic decisions.

Grievance Officer and procedure for reporting a concern

Employees are encouraged to report DEI-related concerns to the grievance officer Manisha Khandelwal, Director - Human Resources.

Whenever a complaint is reported, it must follow the below process:

1. *Preliminary review* – Within 3 days of receiving a concern, grievance officer will review the complaint to understand the nature and details of the complaint. The grievance officer will determine if this complaint can be resolved informally or if a formal investigation is necessary.
2. *Investigation* – Within 3 working days of the preliminary review,
 - a) The grievance officer will arrange and facilitate a meeting (which may take the format of an in-person meeting or a video call) with the complainant. Dependent on the nature of the complaint, the complaint may be discussed with the company's Internal Grievance Redressal Committee and involve them in the procedure and more so especially for complaints received from differently-abled and transgender persons.
 - b) The grievance officer will provide the complainant a written notice of the meeting (which may take the format of an in-person meeting or a video call), including sufficient information about the case to enable the respondent to prepare.
 - c) If the employee cannot attend the meeting at the time specified, he/ she should let the grievance officer know as soon as possible and agree on an alternate schedule.
 - d) The grievance officer may request to meet the employee with his/ her Reporting Manager, Department Head and any other involved stakeholders and review the complaint.
 - e) Any meetings and discussions as part of an investigation are solely for the purpose of fact-finding and no disciplinary action will be taken prior.
3. *Decision making and recommendation* –
 - a) On conclusion of the investigation, findings of the case whether established in full or partial should be documented and a suitable action should be recommended by the grievance officer. The same should also be communicated to the concerned employee in writing, within 3 days of the investigation.
 - b) The complainant will be informed of the outcomes by the grievance officer after the findings and plan of action is discussed with the Management.
4. *Record keeping and tracking* – The Human Resources team should maintain adequate details of all the complaints reported, whether found valid, severe, or not and track progress of it. The monthly progress report should be submitted to the Management.

The grievance officer should handle as well as resolve all reports, matters confidentially and promptly.

Individuals with valid complaint will not face any loss of remuneration while utilizing the redressal mechanism.



Anti-retaliation (Protection and Support for Complainants)

In executing our anti-retaliation policy, our central concern will always be to safeguard the rights and well-being of any person who has lodged, in good faith, a complaint or grievance with the firm. This policy aims to encourage openness and will support complainants to raise genuine grievances.

If the complainant believes that they have been subject of retaliation as a result of registering a grievance, they should contact the relevant personnel immediately and provide specific details of what has occurred. Relevant personnel will investigate and if there is clear evidence of retaliation against them, subsequently take action to remedy the situation.

However, a complainant who has made false allegations maliciously or with a view to personal gain may be subject to disciplinary action.

Commencement, Amendment or Termination of the Guidelines

The Company has the right to review, amend or terminate the guideline from time to time in accordance with the relevant legislation, at its absolute discretion.

