

EQUAL OPPORTUNITY POLICY

PREAMBLE

Northern Arc Capital Limited (“Company”) is an equal-opportunity employer. We celebrate diversity and are committed to creating an inclusive workplace where all employees are treated with respect and dignity.

The Company adopts a zero-tolerance policy towards unlawful discrimination and harassment at the workplace. Discrimination against employees - including on grounds of age, sex, disability, religion, nationality, colour, sexual orientation, and such other characteristics protected by law - is strictly prohibited.

In order to give effect to its commitment of being an equal-opportunity employer, and to protect the rights of Persons with Disabilities and Transgender Persons employed or otherwise hired by the Company in accordance with the Rights of Persons with Disabilities Act, 2016 and the Transgender Persons (Protection of Rights) Act, 2019 and rules made thereunder respectively, the Company has framed this Policy.

APPLICABILITY

- a) This Policy is subject to applicable law and contains certain special provisions for the protection of rights of Persons with Disabilities and Transgender Persons at the workplace.
- b) The Company shall pursue equal opportunity as a policy commitment in all aspects of employment of Persons with Disabilities and Transgender Persons including the hiring/selection process, promotions, transfers, provision of training opportunities, compensation, employee benefits.
- c) The Policy applies to all stakeholders. ‘Stakeholders’ for the purposes of this Policy shall include all employees (whether permanent, fixed term or temporary), business partners, vendors, suppliers, consultants, contractual staff, seconded staff, trainees, apprentices, direct selling agents, and any other person / entity acting for and on behalf of the Company.

DEFINITIONS

“Act” shall mean The Rights of Persons with Disabilities Act, 2016 and/or the rules framed thereunder.

“Code of Conduct” shall mean the code of conduct adopted by the Company.

“Employee” for the purpose of this policy shall mean employees, interns, trainees and secondees of the Company.

“Liaison Officer” shall mean the liaison officer required to be appointed by the Company pursuant to the Act, who shall be responsible for the implementation of this Policy.

“Person with Disability” shall have the meaning assigned to it under the Act – i.e. person with long term physical, mental, intellectual or sensory impairment which, in interaction with barriers, hinders her/his full and effective participation in society equally with others.

“Policy” shall mean this Equal Opportunity Policy adopted by the Company.

“Reasonable Accommodation” shall have the meaning assigned to it under the Act – i.e. necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden in a particular case, to ensure to Persons with Disabilities the enjoyment or exercise of rights equally with others.

"Transgender Person" means a person whose gender does not match with the gender assigned to that person at birth and includes trans-man or trans-woman (whether or not such person has undergone Sex Reassignment Surgery or hormone therapy or laser therapy or such other therapy), person with intersex variations, genderqueer and person having such socio-cultural identities as kinner, hijra, aravani and jogta.

DIVERSITY AND EQUAL OPPORTUNITY COMMITMENT

The Company’s relationship with all of its Employees shall be based on principles of equal opportunity and fair treatment. Discrimination by the Company (or its Employees) on grounds like age, sex, gender, disability, ailment, religion, race, nationality, social or ethnic origin, colour, sexual orientation, political opinion and other personal characteristics unrelated to the inherent requirements of the job, is strictly prohibited and shall be subject to disciplinary action in accordance with the provisions of the Company’s Code of Conduct.

The Company shall not discriminate with respect to any aspect of the employment relationship including the hiring/selection process, promotions, transfers, provision of training opportunities, compensation, employee benefits, termination or retirement policies, and disciplinary practices.

Further, the with regard to Transgender persons, the Company shall maintain confidentiality of the gender identity of the employees except where the Company or its representatives is required to disclose such information to government officials or in order to cater to or provide support to such Employees.

Northern Arc follows the principle of equal pay and terms of employment (including benefits, training promotions, performance reviews, transfers, exits etc). without any bias. The Company believes that all its employees should receive equal pay where they are carrying out similar work, work rated as equivalent or work of equal value.

Any workplace concerns (including grievances in relation to alleged discrimination at the workplace) may be raised by Employees with the Liaison Officer and Chief Legal Counsel in accordance with the procedure detailed below under the heading ‘Liaison Officer’. It is clarified that any grievances or allegations of sexual harassment at the workplace shall be handled in accordance with the specific policy of the Company thereon (as contained in the HR Policy).

POSITIONS FOR DISABLED PERSONS AND TRANSGENDER PERSONS

Pursuant to the Persons with Disabilities Rules, 2017, all establishments are required to identify posts that are suitable for Persons with Disabilities. Further, in addition to Persons with Disabilities Rules, 2017, Transgender Persons (Protection of Rights) Rules, 2020 require all establishments to implement all measures for providing a safe working environment and to ensure that no person with disabilities or transgender person is discriminated in any matter relating to employment including, but not limited to, infrastructure adjustments, recruitment, employment benefits, promotion and other related issues. At Northern Arc Capital, all positions of employment, internships, secondments, etc, are open to everyone, as long as they are capable and competent at carrying out the essential functions of the position. Hiring for positions of employment, internships or secondments shall be solely based on the merit, skill set and competence of the candidate as well as the business need of the Company.

SELECTION PROCESS

The Company adopts a transparent selection process guided by the merit of the candidate. The Company shall review the selection criteria from time to time to ensure that it is not discriminatory against Persons with Disabilities and Transgender Persons. Upon request, application forms shall be made available in alternative formats that are convenient for Persons with Disabilities and Transgender Persons.

FACILITIES AND AMENITIES

The Company shall, as far as possible, endeavor to provide such facilities and amenities to Persons with Disabilities and Transgender Persons to enable them to effectively discharge their duties in the Company. The Company shall take into account the specific and special needs of Person with Disabilities and Transgender Persons employed by it and ensure that its facilities (including physical infrastructure, information and communication technology, safety and security and transportation system, if any, provided by the Company) are easily accessible.

Physical Infrastructure

The Company shall endeavor to ensure that it provides barrier-free accessibility to Persons with Disabilities and that its physical infrastructure is disabled-friendly. Further, the Company shall endeavor to ensure that it provides infrastructural facilities, such as unisex toilets, to Transgender Persons. Towards this end, the Company shall, on a continuous basis, liaise with service providers, facility managers or such other appropriate persons who manage the premises within which its offices are located, in order to endeavor to observance of the accessibility standards prescribed under the Act in relation to its physical infrastructure. On a case to case basis, the Company may also opt to provide assistive devices for the convenience of Persons with Disabilities. Employees facing accessibility issues in relation to the physical infrastructure of the Company or with regard to any other issue, are requested to report the same to the Liaison Officer. Employees may report accessibility issues relating to the Company's information and communication technology, to the Liaison Officer and Chief Legal Counsel.

Transportation System

Transportation facilities, if any, provided by the Company shall adhere to the accessibility standards prescribed under the Act. Employees facing accessibility issues are requested to report the same to the Liaison Officer.

OTHER FACILITIES

Special leave

Upon request by a Person with Disability, the Company, may, at its discretion, allow special leave to such persons if such leave is required in connection with her/his disability.

Reasonable Accommodation

The Company may at its discretion offer Reasonable Accommodation to Persons with Disabilities to enable them to discharge the essential functions of their position in the Company. What constitutes Reasonable Accommodation may differ from case to case and shall be up to the discretion of the Company.

Training and career development

The Company shall ensure that all workshops, orientations or materials provided for post-recruitment and pre-promotion training of its employees are consistent with the needs of Persons with Disabilities. Depending on the role and special needs of Persons with Disabilities, the Company may at its discretion give preference to such persons in matters of transfers and posting and, where applicable, allotment of residential accommodation.

POLICY AWARENESS

Details of the policy and the rights and duties thereunder of the employees of the Company shall be communicated through formal training sessions (on-line and off-line) and informal educational and coaching sessions at regular intervals by the Liaison Officer who will be responsible for the implementation and monitoring of the Policy.

REPORTING OF DISABILITY & CONFIDENTIALITY OF INFORMATION

Employees are requested to report the existence of a disability to the Liaison Officer at the time of joining the organization, in order to ensure protection of their rights under this Policy. Employees are also requested to report disabilities acquired after joining the Company or in case of ceasing of a disability.

Northern Arc respects the privacy of every individual and ensures utmost confidentiality of information /concerns in relation to disability /sexuality/gender identity or any other personal information shared with it by its employees (or potential candidates). However, if the disclosure is mandated under law, then any such disclosure will be handled with utmost confidentiality and in accordance with applicable laws.

LIAISON OFFICER

Pursuant to the provisions of the Act, the Company has appointed Ms. Umasree Parvathy, Chief People Officer as the Liaison Officer. The Liaison Officer shall have the following responsibilities:

- a) Ensuring disability-friendly workplace,
- b) Spreading awareness of this Policy and the rights and duties thereunder among employees of the Company;
- c) Looking after the recruitment of Persons with Disabilities and Transgender Persons;

- d) Provision of facilities and amenities for such employees;
- e) Ensuring the Company's compliance/ implementation of this Policy,
- f) Developing strategies to prevent discrimination or harassment of persons (including disabled persons and Transgender Persons) at the workplace.

VIOLATIONS AND REPORTING

Northern Arc has zero tolerance for disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind. Harassment (physical, verbal or mental harassment) is not tolerated in the workplace and in any work-related circumstances outside of work. Complaints and grievances in relation to discrimination or harassment at the workplace and in any work-related circumstances outside of work may be forwarded to:

Level I:

The Liaison Officer through e-mail communication marked to grievances@northernarc.com or if the Employee so desires, grievances may also be sent anonymously to the Liaison Officer by making use of the drop-box facility instituted in the workplace. The Liaison Officer shall use best efforts to resolve and address grievances in a timely manner including to prevent any further harm or inconvenience to the Employee.

It is clarified that grievances raised with the Liaison Officer shall not affect any rights or recourse that Employees may have under applicable laws.

Level II:

Complaints may be sent to the Chief Legal Counsel through email communication to the official email id of the Chief Legal Counsel.

No reprisal or retaliatory action will be taken against any individual for raising concerns as regards this policy. However, any such reporting by an employee if found to be in bad faith or in a false or frivolous manner, will be considered a violation of the code of conduct, and such employee may be subject to disciplinary action.

REPORTING OF DISABILITY AND CERTIFICATE OF IDENTITY

Employees are requested to report the existence of a disability or certificate of identity issued by the District Magistrate under the Transgender Rules to the Liaison Officer at the time of joining the organization, in order to ensure protection of their rights under this Policy. Employees are also requested to report disabilities / identity acquired after joining the Company or in case of ceasing of a disability. Such information reported to the Company shall be kept confidential except where the Company or its representatives is required to disclose such information to government officials or in order to cater to or provide support to such Employees.