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Policy Preface

The Government of India has notified The Rights of People with Disabilities Act, 2016 (“**RPWD Act**”), The Transgender Persons (Protection of Rights) Act, 2019 (“**TP Act**”) and The Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention And Control) Act, 2017 (“**HIV Act**”) to provide protection to the rights of persons with disabilities, transgender persons and HIV positive persons respectively.. Veritas Finance Private Limited (“**Company**”/ “**VFPL**”) has framed this equal opportunity policy in compliance with the requirements of the RPWD Act, the TP Act and the HIV Act together with the rules prescribed thereunder (collectively, the “**Relevant Laws**”).

At VFPL, we recognize the value of a diverse workforce and are committed to providing equal opportunities in employment thereby creating an inclusive workplace and work culture in which all employees are treated with respect and dignity.

We constantly strive to ensure that our workforce is representative of all sections of society. We believe that, by doing so, we would be better equipped to develop and deliver inclusive growth to all the employees of the organization along with achieving business excellence.

In accordance with anti-discrimination law, it is the purpose of this policy to effectuate these principles and mandates. Through this policy the Company shall proactively work towards equal opportunity in all aspects of employment of persons with disabilities, HIV positive persons or transgender persons including the hiring/selection process, promotions, transfers, provision of training opportunities, compensation and the employee benefits.

The Managing Director along with the Designated Officer has the overall responsibility for the effective operation and implementation of the equal opportunity policy.

Policy Statement

The Company is an equal opportunity employer and is committed to providing a working environment where diversity is embraced and respected. The Company is committed to achieving equality while providing employment as well as during employment. The Company recognises its responsibility to adopt procedures to ensure absence of discrimination in all facets by providing fair & equal opportunities to all employees and applicants. VFPL is committed to eliminating all forms of unlawful discrimination (which includes direct discrimination, indirect discrimination and denial of reasonable accommodation), bullying and harassment of people with disabilities, transgender persons or HIV positive persons.

At VFPL, we continuously strive to ensure that all our facilities, technologies, information and privileges are accessible to people with disabilities, transgender persons and HIV positive persons.

We encourage differently abled candidates, transgender persons and HIV positive persons to apply for any job opportunity arising within the organization. Our decisions on employment, career progression, training or any other benefits are solely based on merit. We follow an inclusive evaluation process by ensuring that a person with disability is provided with such suitable flexibility and accommodation that may be required so that she/he/they may be evaluated fairly. VFPL prohibits discrimination and harassment of any type and affords equal employment opportunities to employees and applicants without regard to race, caste, colour, religion, sex, gender (including gender reassignment), sexual orientation, gender identity or expression, pregnancy, age, national origin/ethnicity, place of birth and/or residence, marital status, the status of being transgender, disability status, genetic information, medical condition including HIV, protected veteran status, or any other characteristic protected by law (a "**Protected Characteristic**"). Any such information shared by an employee shall remain confidential in accordance with applicable data-protection laws and relevant policies of the Company.

If an employee acquires the status of a Protected Characteristic during his/her/their employment tenure, he/she/they can return to work at the same rank as before. In case the employee is unable to perform the assigned job, the organization will invest in re-skilling the employee for another suitable equivalent position.

Scope and Legal Framework

I. Scope and Applicability

This policy is called as “**The Equal Opportunity Policy**” / “**EO Policy**” and is applicable to all the employees of VFPL working across locations wherever VFPL has its premises. The EO Policy applies to all aspects of the relationship between VFPL and its employees, including recruitment, employment, promotion, transfer, training, working conditions, wages and salary administration, employee benefits and application of policies.

This EO Policy will also apply to the selection and treatment of independent contractors, job applicants, interns, trainees, retainers, consultants, personnel working on our premises who are employed by temporary agencies and any other persons or firms doing business for or with VFPL.

II. Relevant Definitions

Some relevant terms of the Relevant Laws are stated below:

Under the RPWD ACT

1. Discrimination:

Discrimination in relation to disability, means any distinction, exclusion, restriction on the basis of disability which is the purpose or effect of impairing or nullifying the recognition, enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field and includes all forms of discrimination and denial of reasonable accommodation.

2. Person with disability:

It means a person with long term physical, mental, intellectual or sensory impairment which, in interaction with barriers, hinders his full and effective participation in society equally with others.

Whereas, “**barriers**” is defined in the RPWD Act to mean:

“any factor including communicational, cultural, economic, environmental, institutional, political, social, attitudinal or structural factors which hampers the full and effective participation of persons with disability in society”.

3. Reasonable accommodation:

Reasonable Accommodation means 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.

Under the TP ACT

4. 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.

Whereas, “persons with intersex variations” is defined in the TP Act to mean:

“person with intersex variations” means *“a person who at birth shows variation in his or her primary sexual characteristics, external genitalia, chromosomes or hormones from normative standard of male or female body”*.

Under the HIV ACT

5. **Discrimination** means any act or omission which directly or indirectly, expressly or by effect, immediately or over a period of time,—
- i. imposes any burden, obligation, liability, disability or disadvantage on any person or category of persons, based on one or more HIV-related grounds; or
 - ii. denies or withholds any benefit, opportunity or advantage from any person or category of persons, based on one or more HIV-related grounds, and the expression “discriminate” to be construed accordingly.

Whereas, **“HIV-related grounds”** include—(i) being an HIV-positive person; (ii) ordinarily living, residing or cohabiting with a person who is HIV-positive person; or (iii) ordinarily lived, resided or cohabited with a person who was HIV-positive.

6. **HIV-positive person** means a person whose HIV test has been confirmed positive.

III. Harassment and Discrimination

The following forms of discrimination are prohibited under this EO Policy and are unlawful:

- (a) **Direct discrimination**: treating someone less favourably based on a Protected Characteristic.
- (b) **Indirect discrimination**: a provision, criterion or practice that applies to everyone but adversely affects specific people with a Protected Characteristic more than others, and is not justified.
- (c) **Harassment**: this includes unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
- (d) **Victimisation**: retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- (e) **Disability discrimination**: this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

Policy Details

1. Rights and Entitlements

The Equal Opportunity Policy of the Company aims at ensuring that none of the employees with disability is discriminated against on the ground of disability, unless it is shown that the impugned act or omission is a proportionate means of achieving a legitimate aim.

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.

2. Positions for persons of Protected Characteristic

In VFPL, the hiring for all the positions is purely based on merit and the candidates are evaluated based upon their skills and competence. Flexibility and accommodations will be provided to persons with disabilities on an individual basis.

Further, the Relevant Laws require all establishments to implement all measures for providing a safe working environment and to ensure that no person is discriminated against in any matter relating to employment and other related issues on account of their disability/sexuality/gender identity/ HIV status. At VFPL, 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.

3. Manner of selection

All positions at the Company are open to people with disabilities, and the hiring and recruitment processes are purely based on the merit and qualifications of the candidate. The manner of employment of persons with disabilities will be the same as the process prescribed for the employment of persons without disabilities, subject to reasonable accommodations and applicable law.

Vacancy advertisement and application

- Wherever possible, all vacancies will be advertised internally and externally.
- Wherever possible, vacancies will be notified to colleges, polytechnics and disability organisations.
- All vacancy advertisements will include an appropriate short statement on equal opportunities for people with disabilities, transgender persons and HIV positive persons.
- Selection criteria (job description and employee specification) will be kept under constant review to ensure that they are non-discriminatory and that they relate purely to the skills needed for the job and nothing else.
- Application forms will be made available in alternate formats, based on request.

4. Facilities and Amenities

The Company shall, make best endeavor to provide such facilities and amenities to persons with disabilities, transgender persons and HIV positive persons to enable them to effectively discharge their duties in the Company.

4.1 *Under the RPWD Act*

The Company will build systems and processes to ensure that no opportunity is denied to persons with disabilities on the ground of disability. The Company shall take into account the specific and special needs of person with disabilities employed by it and ensure that its facilities (including physical/ digital infrastructure, information and communication technology, safety and security and transportation system, if any, provided by the Company) are easily accessible in accordance with the RPWD Act.

- a) **Physical Infrastructure:** VFPL shall endeavor to ensure that it provides barrier-free accessibility to persons with disabilities and that its physical infrastructure is disabled-friendly. 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 observe the accessibility standards prescribed under the RPWD 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 Designated Officer. Employees may report accessibility issues relating to the Company's information and communication technology, to the Designated Officer (as specified in the Governance Framework).
- b) **Digital Infrastructure:** VFPL continuously endeavors to ensure that all our documents, communication and information technology systems adhere to the accessibility standards. We shall always ensure that only accessible technologies are procured. Any employee facing accessibility challenges can reach out to the local IT support team or the Designated Officer (as specified in the Governance Framework).
- c) **Reasonable Accommodation:** VFPL will make reasonable accommodations, whenever necessary, for qualified employees or job applicants who have disabilities, as per the RPWD Act.
Such accommodation will be provided:
- 1) to ensure equal opportunity in the application and selection process,
 - 2) to enable an employee with a disability to perform the essential functions of a job, and
 - 3) to enable an employee with a disability to enjoy the same benefits and privileges of employment as non-disabled employees.

All documents concerning an employee's reasonable accommodations request would be maintained in the employee's confidential file, separate from the employee's official personnel file. The Company shall not compel any person with a disability to partly or fully pay the costs which the Company has

incurred for providing any reasonable adjustment in relation to employees with disability. No actions of the Company in this regard, will be considered a precedent for any future requests for special consideration from any employee with disabilities.

4.2 ***Under the TP Act***

In accordance with the TP Act, the Company shall ensure that all parts and facilities of the Company's office space are safe and gender neutral. Some of the specific facilities and amenities that the Company has endeavored to put in place, and will continue to do so going forward, are:

- (a) Addition of unisex (gender neutral) restrooms at all its establishments. Wherever possible, the Company shall make available single stall restrooms for increased safety and privacy of transgender persons, if requested. Separately, the employees may be allowed to access any restroom consistent with their asserted gender identity;
- (b) Making hygiene products available at all unisex restrooms, including any product specifically requested by transgender employees;
- (c) Making available safe transportation facilities specifically for the transgender employees, if such employees are not comfortable in using the other modes of transportation and have raised a request in this regard;
- (d) Ensure that any form of violence is not perpetrated against any of the employees, including transgender employees, by providing adequate security guards on the premises;
- (e) Ensure safety by installing CCTV cameras at common places within the establishment.

5. **Training and Career development**

VFPL will endeavor to provide course materials meant for induction and training in accessible formats on request. The request for reasonable accommodation, such as assistive aids, accessible training venue, accessible materials, interpreter, scribe, etc. shall be placed at least one week prior to the scheduled date of commencement of induction/training.

The Company has an accessible and inclusive appraisal process. Any employee/manager requiring any accommodations for an appraisal process must place a request at least two days in advance.

6. **Travel, stay and transport**

For official travel, employees with disabilities will be provided accessible modes of transport - air travel (in case road/train travel is inaccessible), and accessible guest houses and hotels and allowing a personal attendant to travel along, as per our reasonable accommodation guidelines. An employee can place a written/email request for this with the Travel Officer.

7. Employee Engagement and social inclusion

VFPL will endeavor to make all Company events and meetings inclusive by ensuring that these are conducted at accessible venues with a provision of reasonable accommodation being available to employees with disabilities.

To the extent possible and relevant, the Company will extend these measures to visitors as well, especially if the Company has been provided with prior notice of the visit.

8. Other Entitlements

An employee's request for extra leave, for a reason related to their disability, will be treated as a request for reasonable accommodation and will be evaluated accordingly on a case-to-case basis. In addition to the leave entitlements available to all employees of the Company, employees with disability may avail a further 5 (five) days of leave per year, on account of their disability, subject to providing adequate evidence in this regard.

9. Key responsibilities of the Company, employees, and HIV positive people

In order to ensure effective implementation of the EO Policy, the Company, its employees and the HIV positive persons have a pivotal role to play. The following key responsibilities must be considered by persons in the Company:

(i) Role of the Company including the administrative staff:

- Implementation of guiding principles - The Company will ensure that no employee is discriminated against on the basis of their HIV status and that all the guiding principles under the HIV Act are being implemented in spirit. The Company will also ensure that no person is denied or terminated from employment because of HIV status. Any other form of discrimination like avoiding talking to that person, sharing of meals, travelling, etc. is also fully prohibited. The Company will also take appropriate steps for implementing other principles including confidentiality and universal precautions.
- Regular capacity building of staff members on basics of the HIV Act - The Company will make provisions for training of staff members on the basics of HIV and AIDS, transmission of HIV, myths and misconceptions, guiding principles with focus on non-discrimination and the HIV Act.

(ii) Role of employees or co-workers:

- As a co-worker it is the responsibility of every employee to not discriminate against colleagues on the basis of HIV status.
- Employees shall ensure that the HIV status if known to them is not disclosed to anyone without informed consent of the HIV positive person.
- If the employees are witness to any form of discrimination against any person on the basis of

HIV status, they should discourage such behaviour and advise the person to file a complaint with either the complaints officer or the ombudsman appointed by the State or district level, in accordance with the HIV Act.

- Employees shall not disclose the personal details including name and address of the person living with HIV to anyone, including the employer, family members, other employees or media agencies.

(iii) Role of person infected with HIV:

- Person infected with HIV, if discriminated, should file a complaint with either the Designated Officer or the ombudsman at the State or district level, in accordance with the HIV Act.
- Person infected with HIV has a duty to prevent transmission of HIV. Every person, who is HIV positive and has been counselled in accordance with the policy issued by the relevant authorities and/or the Company or is aware of the nature of HIV and its transmission, shall take all reasonable precautions to prevent the transmission of HIV to other persons.

10. Maintenance of Records

VFPL respects the privacy of every individual and ensures utmost confidentiality of information / concerns in relation to disability /sexuality/gender identity/ HIV status or any other personal information shared with it by its employees (or potential candidates). All information given to the Company by employees of Protected Characteristic will be treated with respect and confidence and in accordance with applicable data-protection laws and relevant policies of the Company.

10.1 Information relating to persons with disabilities: VFPL will collect and maintain data regarding employees with disabilities in relation to their employment, facilities provided and other necessary information as per the RPWD Act. All employees will be asked to fill the Voluntary Disability Self Identification Form in order to give information regarding any disability that she/he/they may have in accordance with the RPWD Act. VFPL may at any time require an employee to provide proof of disability, including obtaining the necessary certification under the RPWD Act and other applicable laws. The declaration of disability at any time, prior to or during employment, will be completely on voluntary grounds and will be kept confidential.

Employees are also requested to report disabilities acquired after joining the Company or in case of ceasing of a disability. An employee can edit the information at any time during his/her/their tenure. There will be no penalties imposed because he/she/they did not share information regarding her/his/their disability earlier. An employee who acquires disability can also edit and update the form.

10.2 Information relating to transgender persons: Subject to compliance with the applicable laws, VFPL may at any time require any personnel to provide the certificate of identity obtained by a transgender person under the TP Act, if necessary, for internal processes and policies of VFPL. Any such information shared by the employee will be deemed as sensitive personal data or information and will not be disclosed/shared/transferred to any third person, except in accordance with the applicable law.

10.3 HIV-related information: VFPL endeavours to ensure that no HIV positive person is forced to disclose his/her/their status or any other HIV-related information. VFPL will adopt the requisite data protection measures, in accordance with the HIV Act, to ensure confidentiality of HIV-related information provided to it. HIV-related information means any information relating to the HIV status of a person and includes: (a) information relating to the undertaking given for performing the HIV test or result of an HIV test; (b) information relating to the care, support or treatment of that person; (c) information which may identify that person; and (d) any other information concerning that person, which is collected, received, accessed or recorded in connection with an HIV test, HIV treatment or HIV-related research or the HIV status of that person.

All employees shall be oriented on concepts of consent, disclosure and confidentiality related to HIV and AIDS and must ensure that they do not disclose HIV-related information. It shall also be the moral responsibility of all employees to not engage in activities which breach confidentiality. HIV-related information is sensitive in nature and the employees shall ensure prevention of unintended or unwanted disclosure and breach of confidentiality of the data.

Exceptions to the confidentiality clause:

- a. Managers/Supervisors may be given information about an employee's disability for allowing/providing any accommodations.
- b. Security personnel may be given information about an employee's disability so as to facilitate obtaining any necessary support during an emergency.
- c. Government officials who are investigating the compliance with the Relevant Laws, may be given information about an employee's disability and sexuality.

Governance Framework

The Managing Director is responsible for ensuring that the establishment operates in compliance with the Relevant Laws to fulfil the terms of this policy. The HR Head takes a lead in implementing the program and is responsible for planning, monitoring and reviewing its progress to ensure compliance with this EO Policy.

1. Designated Officer

VFPL has appointed its HR (Human Resources) head as a Designated Officer who will be responsible for taking initiative and providing the requisite support needed to realize the goals of an inclusive and accessible workplace and reasonable accommodation. The Designated Officer shall be the Liaison Officer as per the RPWD Act, Complaint Officer as per the TP Act, and Complaints Officer as per the HIV Act. The details of the Designated Officer are mentioned below:

Designated Officer	Email ID
Mr. Kumaresh Sivam - Senior Vice President - HR	kumaresh@veritasfin.in

The Designated Officer is responsible for:

- Implementing the action plan for making the workplace and IT systems accessible for people with Protected Characteristics by liaising with the various departments in the organisation.
- Ensuring that all employees are aware of the Equal Opportunity Policy and know their duties and rights in relation to the Equal Opportunity policy.
- Developing proactive strategies to prevent discrimination and harassment of persons (including persons with disabilities, transgender persons and HIV positive persons) at the workplace.

All employees have the responsibility to comply with the Equal Opportunity Policy. Managers and team members need to monitor the work environment to ensure that it is free from discrimination and harassment and encourages inclusion and respect for others.

All employees are encouraged to report any incidents of violation of this policy and Managers should act promptly when concerns arise or complaints are made.

2. Violations and Reporting

VFPL 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:

The Designated Officer through e-mail communication marked to HR HEAD. The Designated 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. The grievance redressal system in place by VFPL shall ensure that the resolution of grievances is completed within the timelines prescribed under the Relevant Laws.

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

3. No Retaliation

No retaliatory action will be taken against any individual who files a complaint of harassment in good faith or who participates in an investigation of a complaint filed under this EO Policy or otherwise raises concerns as regards this EO 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 employeemay be subject to disciplinary action.

4. Policy Communication and Awareness

This EO Policy is made available to all employees and is uploaded on the website of VFPL. The Employees shall be provided with a physical copy of this policy upon request. This EO Policy shall be reviewed and amended by VFPL as and when required in its discretion or basis any statutory changes that are applicable to VFPL.

5. Overriding Effect

Notwithstanding anything contained in this EO Policy, to the extent that there is any inconsistency/discrepancy between this EO Policy and any statute (including the Relevant Laws), the statutory provisions will prevail and supersede this EO Policy. Further, any matter related to this EO Policy, if not covered herein, will be dealt in the manner prescribed under the applicable laws (including the Relevant Laws).

6. Contact and Further Information

Employees could contact Mr. J Prakash Rayen on his/her/their email ID at prakash@veritasfin.in or on his/her/their contact number at 044 46150011 if he/she/they require any information or clarification in relation to this EO Policy.