

Equal Employment Opportunity Policy
Version 3.3

PB Fintech Limited
& its Subsidiary/group companies

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1. Overview:

This policy ("Policy") is made in light of various acts, legislations, rules, Policies (as notified by the Central or State Governments) from time to time which aim to provide equal opportunities in terms of employment, and protection from various forms of discrimination throughout the employee lifecycle.

This policy is made to implements the provisions of the following Acts and any rules and policies incidental thereto:

- The Right of Persons with Disability Act, 2016
 - The Right of Persons with Disability Rules, 2017
 - The Transgender Persons (Protection of Rights) Act,2019
 - The Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Act,2017
- (Collectively referred to as "Respective Acts")

2. Eligibility

This Policy shall be applicable to all the employees, full time or otherwise, of PB Fintech Limited and to all its subsidiaries, hereinafter collectively referred to as "Company".

3. Definitions:

For the purpose of this policy, the same definition of a '**Disabled Person**' is adopted here as given in the Disability Act, 2016. A 'disabled person' is any person(s) with disability, persons with benchmark disability, and persons with disability having high support needs. This definition is inclusive and categorizes 21 types of disabilities as 'specific disabilities' as provided in the Annexure 1. For further details, one may refer to the Disability Act and Rules.

For the purpose of this policy, the same definition of a '**Transgender person**' is adopted here as given in the Protection of Rights Act, 2019. A '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*.

For the purpose of this policy, the same definition of a '**HIV and AIDS**' is adopted here as given in the HIV & AIDS (Prevention and Control) Act,2017. "AIDS" means Acquired Immune Deficiency Syndrome, a condition characterized by a combination of signs and symptoms, caused by Human Immunodeficiency Virus, which attacks and weakens the body's immune system making the HIV-positive person susceptible to life threatening conditions or other conditions, as may be specified from time to time. HIV" means Human Immunodeficiency Virus. "HIV-affected person" means an individual who is HIV-positive or whose partner (with whom such individual normally resides) is HIV-positive or has lost a partner (with whom

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such individual resided) due to AIDS. "HIV-positive person" means a person whose HIV test has been confirmed positive.

The definitions of other terms used in this Policy shall be the same as defined in the Relevant Acts.

4. Scope:

This Policy covers and is applicable to all the persons who seek employment with the Company or who are working with the Company such as job applicants, full time and part time employees of the Company, interns/ trainee, fixed term employees, contractual employees including temporary employees. Further, the Policy aims at:

1. Appointment of a Liaison officer to oversee recruitment of disabled as per The Right of Persons with Disability Act, 2016.
2. , Appointment of a Complaints officer for grievance redressal and complaint resolution in case of Transgender& people infected with and affected by HIV and AIDS respectively.
3. Identification of Job vacancies for Disabled Person.
4. Prohibition of discrimination in recruitment, selection and growth of Disabled, Transgender person(s) and people infected with and affected by HIV and AIDS
5. Provision of additional facilities or equipment for Disabled, and people infected with and affected by HIV and AIDS
6. Accessibility norms with respect to company premises & infrastructure
7. Maintenance of records of Disabled, and people infected with and affected by HIV and AIDS in employment of the Company
8. Confidentiality related to HIV-related information.
9. Complaints procedure for Disabled, Transgender& people infected with and affected by HIV and AIDS.

5. Policy Statement:

It is the Policy of Company to provide equal employment opportunities, and Company is committed to eliminate all kind of discrimination on the grounds of HIV or AIDS, age, colour, disability, marital status, nationality, race, religion, gender or sexual orientation. The Company strives that all decisions on employment, career progression, training or any other benefits are solely based on qualification and merit.

The Company is committed to maintain a work environment that is free from any harassment based on above considerations. This Equal Opportunities Policy is subject to The Right of Persons with Disability Act, 2016, The Transgender Persons (Protection of Rights) Act, 2019 and the HIV & AIDS (Prevention and Control) Act,2017 and any rules, guidelines or government policies incidental thereto as amended from time to time, along with other applicable laws & regulations whose intent is primarily anti- discrimination.

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The Company may provide a reasonable assistance to people living with HIV if need be in the form of minor adjustments to a job or work that enables an HIV positive person who is otherwise qualified to enjoy equal benefits or to perform the essential functions of the job or work, as the case may be. Termination without reasonable accommodation would be an exception and would be initiated based on a written assessment of a health care provider only if the HIV positive person poses a significant risk of transmission to other person in the Company or is unfit to perform the duties of the job. The Company will also submit a copy of a written statement stating the nature and extent of administrative or financial hardship for not providing the person reasonable assistance.

This Equal Employment Opportunity Policy is consistently applied throughout the period of employment of the individual, right from the recruitment process till superannuation. In accordance with the provisions of the Relevant Acts, it is Company's Policy to ensure that the work environment is free from any discrimination against all persons. Further, the Company will take all actions to ensure that a conducive environment is provided to persons to perform their role and excel in the same.

5 a. In line with the provisions of the Disability Act, the Company will build systems and processes to ensure:

- That no opportunity is denied to persons with disability(ies) , merely on ground of disability
- That, as such, a disabled person may apply to any of the jobs vacancies available in the company provided that his/her selection or otherwise, is purely on the grounds of merit and as assessment of the key skills, knowledge or abilities required for said job.
- A grievance redressal committee - Equal Employment Opportunity Committee ("EEO Committee"), headed by the Complaints Officer is constituted for addressing the matters related to the employment of persons with disabilities, is constituted and can be reached via email or Employee Helpdesk, PBsupport, under the section of Grievance >EEO(Equal opportunity). Details are appended in this policy.
- That the EEO Committee will ensure if any grievance does arise and is brought up to the Committee concerning selection of person(s) with disability(ies) for any position, training, promotion, transfer posting, leave & preference in accommodation allocation etc. is dealt with in a fair and equitable manner free from any discrimination and in accordance with the procedure set out in the Respective Acts.
- That, given the nature of disability(ies), the EEO Committee or Human Resources ("HR") team may suggest, not coerce if a particular job or role may be less suitable for an individual. At the same time, another more suitable role may be recommended.
- That appropriate facilities and amenities are provided to persons with disability (ies)to enable them to effectively discharge their duties in the establishment.
- That provision is made for an accessible environment and of availability of assistive devices as required.
- That the HR Department will ensure a Liaison officer is designated to oversee the provision of required facilities/amenities including the process of recruitment for persons with disabilities.

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Such Liaison Officer shall be part of the Human Resources team reporting to the Head of Human Resources of the Company.

- That all forms of discrimination against persons with disability (ies) are prohibited, unless it can be proved that such discrimination is proportionate in nature and a necessary means of achieving legitimate purposes.

5 b. In line with the provisions of the Transgender Act, the Company shall ensure no discrimination against a transgender person on any of the following grounds, namely:

- The unfair treatment in, or in relation to, employment or occupation.
- The denial of, or termination from, employment or occupation.
- The denial or discontinuation of, or unfair treatment with regard to- access to, or provision or enjoyment or use of any goods, service, facility, benefit, privilege or opportunity dedicated to the use of the general public or customarily available to the public.

The Company shall designate a person to be a Complaints Officer to deal with the complaints relating to violation of the provisions of the Act.

5 c. In line with the provisions of the HIV & AIDS (Prevention and Control) Act., the Company will build systems and processes to ensure:

- That no opportunity is denied to persons on ground of HIV & AIDS status.
- That, as such, infected person may apply to any of the jobs vacancies available in the company provided that his/her selection or otherwise, is purely on the grounds of merit and as assessment of the key skills, knowledge or abilities required for said job.
- A grievance redressal committee - Equal Employment Opportunity Committee (“EEO Committee”) headed by a Complaints Officer, is constituted for addressing the matters related to the employment of persons, is constituted, and can be reached via email or Employee Helpdesk. Details are appended in this policy.
- That the EEO Committee will ensure if any grievance does arise and is brought up to the Committee concerning selection of HIV & AIDS person for any position, training, promotion, transfer posting, leave & preference in accommodation allocation etc. is dealt with in a fair and equitable manner free from any discrimination in accordance with the procedure laid down in the Respective Acts.
- That, every complaint would be made to the Complaints Officer in writing in the Form Appendix A. Where a complainant is unable to file the complaint in writing, the Complaints Officer shall provide reasonable assistance to the complainant to file the complaint in writing. The complaint shall be made within three months from the date that the complainant became aware of the alleged violation of the Act in the establishment. Extension of another three months shall be granted, if the complaints officer is satisfied of the circumstances that prevented the complainant from registering the complaint within the stipulated period.
- That, the Complaints Officer on receipt of a complaint should provide an acknowledgement within 2 days of the receipt of the complaint to the complainant and record the complaint in

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electronic form. The time of the complaint and the action taken on the complaint should be recorded.

- The Complaints Officer should arrive at a decision of the complaint promptly and in any case within seven working days. In case of emergency where the complaint relates to discrimination in the provision of universal precautions, the complaint officer should decide the complaint on the same day.
- **Action by Complaints Officer:** In event of any Violation of the HIV & AIDS (Prevention and Control) Act, 2017 Act, the Complaints Officer shall direct the establishment to take measures to rectify the violation and counsel the person who has committed the violation and shall require such person to undergo training in relation to HIV and AIDS, provisions of the Act, rules, guidelines and aspects of stigma and discrimination and social service should also be done for a fixed period. Upon subsequent violation of the Act by the same person, the Complaints Officer may recommend the establishment to take disciplinary action in accordance with the law.
- The Complaints Officer should inform the complainant of the action taken in relation to the complaint and of the complainant's right to approach the ombudsman appointed as per HIV & AIDS (Prevention and Control) Act, 2017 or to any other appropriate legal recourse in case the complainant is dissatisfied with the action taken.
- **Reporting of Complaints:** The Complaints Officer shall ensure that the complaint, its nature and number and the action taken are reported to the appropriate authority under the Central Government (Deputy Director General, Information Education and Communication or Director Administration, National AIDS Control Organization) every six months. In case there are no complaints in last six months, submission of a 'nil report' is not a compulsion.
- The complaints officer if requested by the complainant should ensure the protection of the identity of the protected person in the following manner namely :-
 - a) The Complaints Officer should file one copy of the document bearing the full name, identity and identifying details of such protected person which shall be kept in a sealed cover and in safe custody with the complaints officer.
 - b) The Complaints Officer shall provide pseudonyms to protected person involved in complaints before them.
 - c) The identity and identifying details of the complainant should not be revealed by any person or their representatives including assistants and staff.
- The complaints officer shall comply with the data protection measures in assistance with the section 11 of the HIV and AIDS (Prevention and Control) Act, 2017 and Guidelines on Confidentiality of Data of protected persons there under. Data protection measures shall be adopted including protecting information from disclosure, procedures for accessing information, provision for security systems to protect the information stored in any form and mechanisms to ensure accountability and liability of persons in the establishment
- Accountability and liability of security of HIV-related information should be with Data Management Committees or the heads of concerned establishment.

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Individuals with HIV & AIDS, disabilities or Transgender people who apply to a job with the company or employees who believe themselves to be covered by under respective Acts., are advised to contact the Human Resources Representative in any given location.

Any information related to HIV –AIDS, disability & Transgender that is obtained by the company via it's HR team is voluntary, will be kept confidential, and will be used in accordance with applicable laws. Refusal to provide such information will not subject an employee or a job applicant to any adverse treatment. Employees and applicants will be protected from coercion, intimidation, interference, discrimination or retaliation for filing a complaint or assisting in an investigation under the Act.

6.Responsibility

- Every member of Company management is responsible in giving effect to this policy.
- It is the responsibility of employees to not discriminate against any other employee on the basis of personal characteristics including disability, transgender & HIV status.
- Employees have to ensure that the disability, transgender & HIV status if known to them is confidential information and cannot be disclosed to anyone without informed consent of the concerned persons..
- It is also the moral responsibility of co-workers and other staff members to not engage in activities which breach confidentiality of the persons with disabilities, transgenders and people infected and affected by HIV and AIDS.
- The Company shall ensure that the data of persons as per the Respective Acts is kept confidential and protected against unauthorized use.
- The administration or facilities team is responsible for obtaining and utilizing up-to-date information regarding applicable state and local laws and regulations with regards to accessibility and amenities.
- The Human Resources Managers have the functional responsibility of assuring compliance with EEO policy; developing, coordinating and implementing all programs; and reporting findings and progress.
- Any employee who violates this Policy, or in any manner discriminates with any persons (disabled & transgender) renders any harassment to such person shall be dealt with under the Code of Conduct of the Company.
- The Human Resources Department will maintain the list of HIV-AIDS, disabled & transgender personnel manning any roles within the company at all times
- The Head of Human Resources is accountable to the CEO to oversee and promote this policy.

7.Communication of Policy

- This Policy will be available to all employees via the Company's Intranet site, PB connect and normal communication vehicles (email and notice boards) within the Company.
- Suitable material will be included in Company publications, management conferences, and supervisory training courses.

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- All recruitment literature and employment advertising will indicate that the Company is an Equal Opportunity Employer.

8. Member of EEO Committee

#	Responsibility Type	PB Fintech Limited & its Subsidiary/group companies
1	Liaison Officer/Complaint Officer	Sakshi Singh (VP-HR) sakshi@policybazaar.com
2	EEO Committee Member 1	Kheadup Dorjee Bhutia (CXO) jerry@policybazaar.com
3	EEO Committee Member 2	Dhiraj Kalra (CXO) dhirajkalra@paisabazaar.com
4	EEO Committee Member 3	Shambhavi Solanki (Director – HR) Shambhavi@Policybazaar.com
5	EEO Committee Member 4	Sonika Katyal (VP–HR) sonikakatyal@policybazaar.com

Disclaimer: This is in an internal policy of the Company and is subject to change without notice

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Annexure -1

S.N	Disability	Affected part of body	Diagnosis	Permanent physical impairment/mental disability (in %)
1	Locomotor disability	@		
2	Muscular Dystrophy			
3	Leprosy cured			
4	Dwarfism			
5	Cerebral Palsy			
6	Acid attack Victim			
7	Low vision	#		
8	Blindness	#		
9	Deaf	£		
10	Hard of Hearing	£		
11	Speech and Language disability			
12	Intellectual Disability			
13	Specific Learning Disability			
14	Autism Spectrum Disorder			
15	Mental illness			
16	Chronic Neurological Conditions			
17	Multiple sclerosis			
18	Parkinson's disease			
19	Haemophilia			
20	Thalassemia			
21	Sickle Cell disease			

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APPENDIX A

Form for making Complaint to Complaints Officer

1. Date of Incident.....
2. Place of Incident.....
3. Description of Incident.....
4. Person/institution responsible for the incident.....

Signature/Thumb Impression of Complainant*Name:

Date:

Mobile No./email/Fax/Address:

For official use only:

Complaint Number: