

EQUAL OPPORTUNITY POLICY

PREAMBLE

At **SIDBI Venture Capital Limited** (“**Company**”), we believe in equal opportunity for all our employees, where we are committed to providing an inclusive work culture and environment free from any discrimination. Company values and welcomes diversity and will not treat anybody differently because of their race, sex, religion/beliefs, disability, marital or civil partnership status, age, maternity or paternity status, sexual orientation, gender identity, gender expression, caring responsibilities, or any other class of person protected by laws in the country.

The Company’s vision is to be “Disability Confident”. Company as an inclusive employer actively encourages the recruitment, development and retention of people with disability and ensures they have equal opportunities in the workplace and strives to provide a safe, accessible and healthy work environment.

This Equal Opportunity Policy (“**Policy**”) has been framed in accordance with the provisions of the Rights of Persons with Disabilities Act 2016 (“**Act**”) and the rules framed thereunder and provides a framework which is committed to working towards the empowerment of persons with disabilities. This Policy aims to provide practical guidance on the management of disability issues at the workplace in accordance with the provisions of the Act and its rules. This Policy is prominently displayed on the Company website and in the Company premises for easy accessibility and reference.

1. SCOPE

This Policy is applicable to all prospective and existing employees of the Company throughout the period of their employment (right from the recruitment process till superannuation) and all of their offices, units and branches located anywhere in India and will be subject to and have to mandatorily comply with this Policy. This Policy is subject to the provisions of the Act, the rules framed thereunder.

The selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question. Personal specifications and job descriptions will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment, promotion or transfer will be assessed objectively against the requirements for the job. The Company will strictly refrain from demonstrating bias or prejudice towards individual differences which will be valued and protected.

2. DEFINITIONS

- (i) “barrier” means any factor including communicational, cultural, economic, environmental, institutional, political, social, attitudinal or structural factors which hampers the full and effective participation of persons with disabilities in society.
- (ii) “disability” means as any condition which has a significant, adverse and long-term effect on a person's ability to carry out normal day-to-day activities;



- (iii) “person with disability” 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;
- Refer Annexure 1, at the end of the Policy document, for details on the listed disabilities as per the Act;
 - Any employee declaring as under “Person with Disability”, will be required to obtain a Certificate of Disability in the prescribed manner.
- (iv) “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.

3. GUIDING PRINCIPLES

At our Company, we are committed towards providing a safe, diverse and comfortable workplace to our employees with complete fairness around employment related decisions including recruitment, development and retention of people with disability.

At our Company, we strive to ensure:

- i. A culture of mutual respect and we respect individual rights and differences of others thereby creating an environment free from any discrimination and bias;
- ii. Our Policy of equal opportunity provides a conducive work environment which encourages every individual irrespective of any differences to discharge their duties basis their abilities and qualifications;
- iii. No individual will be denied of any opportunity on grounds of disability. All the open positions available at the Company will be published (on official website/intranet) and selection of qualified applicant will be based on merit, considering the job requirements, individual’s suitability, ability, competence and trainability to execute the role;
- iv. We make workplace adjustments to make sure persons with disabilities are not put at a disadvantage by employment arrangements or any physical feature of the workplace and hence provide a free and accessible environment to all;
- v. Equal pay and terms of employment (including benefits, training, promotions, performance reviews, transfers, exits, etc.) without any bias. We believe all employees should receive equal pay when they are carrying out similar work, work rated as equivalent or work of equal value. The Company has a transparent and standard rewards framework applicable to all employees which is objective driven basis individuals’ roles, qualification, experience and duties;



- vi. Any benefits (monetary, developmental or progression) will be based on performance and potential as per the business need;
- vii. We inculcate awareness amongst our employees through educational sessions and forming internal groups to promote diversity for employees;
- viii. All policies and decisions will be applicable to all employees during their course of employment and shall purely be based on organizational needs, job requirements and individual skills, attributes and experience;

4. MONITORING EQUAL OPPORTUNITY

All policies and processes will be applicable to all individuals while employed with the Company.

5. WORKPLACE ADJUSTMENTS

A workplace adjustment is an agreement with your Line Manager for the alteration of the way you do things in order to help you overcome obstacles caused by a health condition or disability and continue doing your job well. Adjustments can be temporary, as part of rehabilitation, or permanent.

Adjustments typically fall into two categories:

- (i) Infrastructure and equipment – for example, barrier-free accessibility within the premises, a new chair, desk, some IT kit or new software, provision of documents, communication and information technology systems adhering to the accessibility standards (through assistance from the IT support team).
- (ii) The task itself – these cover the way someone performs a job. They might include regular breaks, change to working pattern.

At our Company, it is our policy to make the adjustments our people need because we are committed to making sure everyone can succeed here – irrespective of their background, health status or disability.

Procedure for workplace adjustment- If any of the employees with disability is facing difficulty doing his/her job properly because of a health condition or disability, then they should raise the question of adjustments with their respective Line Managers.

6. MAINTENANCE OF RECORDS

The Company shall maintain records reflecting details of the person with disability such as nature of disability, nature of work, gender, address and the facility / ies provided.



At the time of hiring:

- (i) New joiners would need to disclose any existing disability as defined in Annexure 1;
- (ii) The individual intending to be covered under the Policy must submit the disability certificate as obtained from a medical authority / Government authorised personnel as per the Act and the rules framed thereunder; and
- (iii) Recruitment team will ensure the provisions are available in the candidate application form to capture the disability details.

For existing employees:

- (i) In course of employment with the Company, any employee who wants to be covered by the Policy should contact the Human Resources personnel. The declaration of disability will be completely on voluntary grounds and will be kept confidential.

7. COMMUNICATION OF POLICY

- (i) All employees at the time of joining will be taken through the Policy during their induction.



Specified Disability: (As mentioned in the Rights of People with Disabilities Act 2016)

1. Physical disability –

A. Locomotor disability (a person's inability to execute distinctive activities associated with movement of self and objects resulting from affliction of musculoskeletal or nervous system or both), including—

(a) "leprosy cured person" means a person who has been cured of leprosy but is suffering from—

(i) loss of sensation in hands or feet as well as loss of sensation and paresis in the eye and eye-lid but with no manifest deformity;

(ii) manifest deformity and paresis but having sufficient mobility in their hands and feet to enable them to engage in normal economic activity;

(iii) extreme physical deformity as well as advanced age which prevents him/her from undertaking any gainful occupation, and the expression "leprosy cured" shall construed accordingly;

(b) "cerebral palsy" means a Group of non-progressive neurological condition affecting body movements and muscle coordination, caused by damage to one or more specific areas of the brain, usually occurring before, during or shortly after birth;

(c) "dwarfism" means a medical or genetic condition resulting in an adult height of 4 feet 10 inches (147 centimetres) or less;

(d) "muscular dystrophy" means a group of hereditary genetic muscle disease that weakens the muscles that move the human body and persons with multiple dystrophy have incorrect and missing information in their genes, which prevents them from making the proteins they need for healthy muscles. It is characterised by progressive skeletal muscle weakness, defects in muscle proteins, and the death of muscle cells and tissue;

(e) "acid attack victims" means a person disfigured due to violent assaults by throwing of acid or similar corrosive substance.

B. Visual impairment —

(a) "blindness" means a condition where a person has any of the following conditions, after best correction—

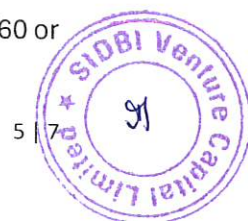
(i) total absence of sight; or

(ii) visual acuity less than 3/60 or less than 10/200 (Snellen) in the better eye with best possible correction; or

(iii) limitation of the field of vision subtending an angle of less than 10 degree.

(b) "low-vision" means a condition where a person has any of the following conditions namely:

(i) visual acuity not exceeding 6/18 or less than 20/60 up to 3/60 or



up to 10/200 (Snellen) in the better eye with best possible corrections; or

(ii) limitation of the field of vision subtending an angle of less than 40 degree up to 10 degree.

C. Hearing impairment

(a) "deaf" means persons having 70 DB hearing loss in speech frequencies in both ears;

(b) "hard of hearing" means person having 60 DB to 70 DB hearing loss in speech frequencies in both ears;

D. "speech and language disability" mean a permanent disability arising out of conditions such as laryngectomy or aphasia affecting one or more components of speech and language due to organic or neurological causes.

2. Intellectual disability, a condition characterised by significant limitation both in intellectual functioning (reasoning, learning, problem solving) and in adaptive behaviour which covers a range of every day, social and practical skills, including—

A. "specific learning disabilities" means a heterogeneous group of conditions wherein there is a deficit in processing language, spoken or written, that may manifest itself as a difficulty to comprehend, speak, read, write, spell, or to do mathematical calculations and includes such conditions as perceptual disabilities, dyslexia, dysgraphia, dyscalculia, dyspraxia and developmental aphasia;

B. "autism spectrum disorder" means a neuro-developmental condition typically appearing in the first three years of life that significantly affects a person's ability to communicate, understand relationships and relate to others, and is frequently associated with unusual or stereotypical rituals or behaviours.

3. Mental behaviour, "mental illness" means a substantial disorder of thinking, mood, perception, orientation or memory that grossly impairs judgment, behaviour, capacity to recognise reality or ability to meet the ordinary demands of life but does not include retardation which is a condition of arrested or incomplete development of mind of a person, specially characterised by sub normality of intelligence.

4. Disability caused due to—

A. Chronic neurological conditions, such as—

(a) "multiple sclerosis" means an inflammatory, nervous system disease in which the myelin sheaths around the axons of nerve cells of the brain and spinal cord are damaged, leading to demyelination and affecting the ability of nerve cells in the brain and spinal cord to communicate with each other;



(b) "parkinson's disease" means a progressive disease of the nervous system marked by tremor, muscular rigidity, and slow, imprecise movement, chiefly affecting middle-aged and elderly people associated with degeneration of the basal ganglia of the brain and a deficiency of the neurotransmitter dopamine.

B. Blood disorder—

(a) "haemophilia" means an inheritable disease, usually affecting only male but transmitted by women to their male children, characterised by loss or impairment of the normal clotting ability of blood so that a minor would may result in fatal bleeding;

(b) "thalassemia" means a group of inherited disorders characterised by reduced or absent amounts of haemoglobin;

(c) "sickle cell disease" means a hemolytic disorder characterised by chronic anaemia, painful events, and various complications due to associated tissue and organ damage; "hemolytic" refers to the destruction of the cell membrane of red blood cells resulting in the release of haemoglobin.

5. **Multiple disabilities** (more than one of the above specified disabilities) including deaf blindness which means a condition in which a person may have combination of hearing and visual impairments causing severe communication, developmental, and educational problems.

6. Any other category as may be notified by the Central Government.

