

FINOVA CAPITAL PRIVATE LIMITED

Equal Opportunity Policy

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1. Introduction

Finova Capital ('Company') recognizes the importance of Equal Opportunity as both a moral obligation and a legal responsibility. We are committed to fostering a work environment free from discrimination, where every individual is treated with dignity and respect. This Equal Opportunity Policy ('Policy') is designed to ensure compliance with relevant laws and promote inclusivity across all aspects of our operations.

2. Objective

Company is dedicated to providing equal opportunities to all individuals, regardless of age, color, disability, marital status, nationality, race, religion, gender, gender identity, sexual orientation, HIV/AIDS status, or any other protected status recognized under applicable laws. Our objective is to maintain a workplace free from harassment and discrimination, where decisions concerning employment and customer interactions are based solely on merit and qualifications.

3. Equal Opportunity Statement

In accordance with applicable laws including the;

- Rights of Persons with Disabilities Act, 2016
- The Transgender Persons (Protection of Rights) Act, 2019
- The Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Act, 2017

Company ensures that all practices and policies are non-discriminatory towards individuals belonging to protected categories. We are committed to creating an environment that supports the professional growth and contributions of every employee, customer, and stakeholder.

4. Anti-Discrimination

Company strives to ensure a culture of respect for individual rights and differences thereby creating an environment free from any discrimination and bias and provides a conducive work environment which encourages every individual irrespective of any differences to discharge their duties basis their abilities and qualifications. Discrimination here refers to practices of less favorable treatment to persons in employment opportunities and practices due to prejudice, misconception, or stereotype basis gender (including gender reassignment), disability, HIV+ status, or any other characteristic protected by applicable law. The following forms of discrimination are prohibited:

(a) Direct discrimination: Treating someone less favourably because of a particular protected characteristic they have.

(b) Indirect discrimination: A provision, criterion, or practice that applies to everyone but adversely affects people with a particular protected characteristic more than others and is not justified.

(c) Victimization: Retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.

5. Monitoring Adherence

Company has appointed a Liaison/Complaints Officer to ensure effective implementation of this Policy and to receive any complaints of violation of this Policy. The name and contact number of the officer shall be notified (and updated from time to time) through official communication channels and will remain available on the Company's intranet portal.

The Liaison/Complaints Officer oversees compliance and ensures the following:

- (a) Provision of required infrastructure facilities and amenities for persons with disabilities, transgender persons and HIV+ persons;
- (b) Hiring process based on fairness, ability and merit and ensuring that no opportunity is denied to any person on ground of gender identity, disability, or other protected characteristics;
- (c) Implementation of policies and processes including but not limited to job responsibilities, training, performance review, promotion, transfers, exits;
- (d) Provision of redressal mechanism in case of any grievance raised involving unlawful discriminatory conduct; and
- (e) Suggestion of any changes / recommendations based on industry best practices to ensure that the Company remains at the forefront of being an equal opportunity employer.

6. Facilities and Amenities for Persons with Disabilities and Transgenders

a) Physical and Digital Infrastructure: Company endeavours to maintain accessible physical facilities and digital platforms in compliance with accessibility standards. Similarly, all necessary infrastructure facilities and measures for safety and security and amenities are provided to all its employees to effectively discharge their duties.

Employees and customers requiring accommodations are encouraged to communicate their needs to the designated Liaison/Complaints Officer for prompt resolution.

b) Reasonable Accommodation: The Company provides reasonable accommodations to qualified individuals with disabilities or special needs, which may include modifications to equipment, flexible work arrangements, or accessible formats for communication and training materials. No person shall be compelled to bear the cost of such reasonable accommodation which will be provided on a best effort basis.

7. List of Positions Identified

All positions in the Company are open to individuals belonging to protected categories. Recruitment and selection processes are conducted based on merit, skills, and qualifications relevant to the job role.

8. Manner of Selection

Vacancies are advertised internally and externally, ensuring transparency and equal access to employment opportunities. Selection criteria are reviewed regularly to eliminate discriminatory

practices and align with job-related requirements. Company aims to provide reasonable accommodation during the recruitment process based on requests made by a candidate.

9. Grievance Redressal Mechanism

The Company has appointed Liaison/Complaints Officer responsible for overseeing compliance with this Policy.

All complaints regarding violations of this Policy can be made as per following:

- Head of People and Culture – For employee related complaints (eop@finova.in)
- Principal Nodal Officer – For customer related complaints (pno@finova.in)

In relation to complaints filed by HIV+ persons, as per legal requirements, the timeline for the complaint to be filed with the Liaison/Complaints Officer is 3 months from the date that the complainant became aware of the alleged violation of the Policy. If the officer is satisfied that there were circumstances that prevented the complainant from making the complaint within the stipulated period, an extension of another 3 months may be granted. It is the responsibility of the Liaison/Complaints Officer to inform the complainant of the action taken in relation to the complaint and in case the complainant is dissatisfied with the action taken, inform the complainant of their right to approach the Ombudsman appointed by the relevant government at the state level, or of any other appropriate legal recourse which may be taken by the complainant. The officer will also ensure the protection of the identity of the person infected with and/or affected by HIV and AIDS in the following manner: (i) file one copy of the document bearing the full name, identity and identifying details of such person, which shall be kept in a sealed cover and in the safe custody with the officer; (ii) provide pseudonyms to the person infected with and / or affected by HIV and AIDS; and (iii) ensure that the identity and identifying details of such person are not revealed by any person or their representatives including assistants and staff.

All complaints should contain key details regarding the violations, including date of the incident, place of the incident, description of the incident, person responsible for the incident, contact details of the complainant, and signature of the complainant (if the complaint is furnished by way of a letter).

The Company shall investigate and resolve all complaints made under this policy within the timelines prescribed by applicable laws and regulations, ensuring prompt and equitable redressal of grievances.

10. Special Leave

Employees requiring additional leave due to disability-related reasons are entitled to apply for special leave in accordance with the Company's leave policy. Requests will be evaluated fairly, considering individual circumstances and business needs.

11. Training and Career Development

Company is committed to providing inclusive training programs and career development opportunities. Training materials are made accessible upon request, and employees during their tenure will receive support to explore suitable career paths within the organization.

12. Disability Questionnaire and Records

To comply with legal requirements and ensure effective support for employees, Company may request employees to voluntarily disclose information regarding disabilities or special needs. This information is confidential and used solely for providing necessary accommodations and support.

Further, as per applicable laws, Company may be required to maintain records of persons with disabilities which will contain the details of the persons with disabilities employed, the nature of disability suffered by the person, the nature of work to be performed by the person, and the type of facility to be provided to such person.

13. Confidentiality

All information related to employees' protected characteristics, including disabilities, gender identity, or HIV/AIDS status, is treated confidentially and disclosed only on a need-to-know basis for accommodation purposes or as required by law.

It is to be noted that since the information about a person's sex at birth, sexual orientation, or health condition is sensitive personal information, and all employees handling such information must ensure that such information is kept confidential and not shared with anybody. Any unwarranted / unauthorised disclosure of the same by any employee may lead to violation of a person's privacy and, therefore, the Company will take strict disciplinary actions against such disclosures.

It is also clarified that any information provided is voluntary and will be used in accordance with applicable laws and policies of the Company. Refusal to provide information will not subject an employee or applicant to adverse treatment in any matter pertaining to employment.

14. Responsibilities of the HIV-Infected / Affected Individual

Any individual infected with HIV and AIDS has the duty to prevent transmission of HIV and AIDS and shall take all reasonable precautions to prevent the transmission of HIV and AIDS to other persons.

15. Anti-Retaliation

Company reserves the right to initiate appropriate disciplinary action (which includes termination of employment) against the concerned individual responsible for violation of this Policy. Actual or threatened retaliation against employees who complain about discrimination, cooperate with investigations regarding discrimination complaints, or request reasonable accommodation, is prohibited and unlawful and shall be dealt with in accordance with the Company's disciplinary policy.

16. Amendments

Any amendments to this Policy shall be notified from time to time, and it is the responsibility to all employees to keep themselves updated about such amendments.