



Equal Opportunity Policy

Introduction:

Nuvama Group (hereinafter referred as “the Company”) is committed to provide 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 recognizes its responsibility to adopt procedures to ensure the absence of discrimination in all facets by providing fair & equal opportunities to all employees and applicants. The Company believes that employees need to be offered a working environment where they would be encouraged to maximize their potential. The Company prohibits any form of discrimination in employment opportunities or practices on the basis of religion, race, caste, gender (including gender reassignment), color, gender identity, sexual orientation, national origin, age, veteran or military status, marital status, pregnancy status, disability, disease including HIV, genetic information, or any other characteristic protected by applicable law.

1. Objective

With implementation of this policy, the Company aims to achieve its objective of equality of opportunity and non-discrimination to all its employees, not only in employment opportunities and practices, but also in other policies & practices of the Company. The principles contained in this policy are in line with the objectives of applicable laws of equality enshrined in the Constitution of India & including but not limited to “The Rights of Persons with Disabilities Act, 2016 & Rules thereunder”, “The Transgender Persons (Protection of Rights) Act, 2019” Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention And Control) Act, 2017 & Rules etc.

2. Title, Scope & Applicability of the Policy

This Policy is called as “The Equal Opportunity Policy. The policy is applicable to all the employees of the “Entity” working across locations and countries wherever “Entity” has its offices in the world. If any of the provision of the policy is contradicting with any of the law of the land outside India, the provisions of state / local laws will supersede. This policy also covers job applicants, interns, trainees, retainers / consultants on the rolls of the company.

The equal opportunity policy of a private establishment having twenty or more employees and the Government establishments shall, inter alia, contain the following, namely: -

- (a) facility and amenity to be provided to the persons with disabilities to enable them to effectively discharge their duties in the establishment.
- (b) list of posts identified suitable for people with disabilities in the establishment.
- (c) the selection of persons with disabilities for various posts, post-recruitment and pre-promotion training, preference in transfer and posting, special leave, preference in allotment of residential accommodation if any, and other facilities.
- (d) provisions for assistive devices, barrier-free accessibility and other provisions for persons with disabilities.
- (e) appointment of liaison officer by the establishment to look after the recruitment of persons with disabilities and provisions of facilities and amenities for such employees.

3. Employee Responsibilities

All employees employed by or in any way acting in connection with the work / functioning of the Company shall-

- a. Familiarize themselves with the contents of this policy and honor its principles in spirit and in practice.
- b. Familiarize themselves with the disciplinary consequences of violation of this policy.
- c. Familiarize themselves with Disciplinary Mechanism
- d. Maintain highest standards of conduct that would not make any other person feel discriminated, uncomfortable and violate employee's right to work with dignity in a working environment based on equality.

4. Definitions

- Employee means a person employed at a workplace and is on the rolls of the company for any work on regular basis and also includes, for the purposes of this policy, probationer, trainee, consultant, retainer who is on the rolls of the company
- Discrimination- Practices of less favorable treatment to persons in employment opportunities and practices due to prejudice, misconception, stereotype basis religion, race, caste, gender (including gender reassignment), color, gender

identity, sexual orientation, national origin, age, veteran or military status, marital status, pregnancy status, disability, disease including HIV, genetic information, or any other characteristic protected by applicable law would be considered as discrimination for the purpose of this policy.

- 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.
- Support means an intensive support, physical, psychological and otherwise, which may be required by a person with disability or certain disease for daily activities, to take independent and informed decision to access facilities and participate in all areas of employment opportunities in the Company.
- Reasonable accommodation means necessary and appropriate modification and adjustments in the Company policies, to ensure support to persons with disabilities or diseases. The same shall be made on a case-to-case basis and would be within the discretion of the Company.
- Grievance – Grievance means any complaints, concerns pertaining to discrimination raised to the designated officer.
- Aggrieved Person- Any person who has raised a grievance as per clause 5 (f) of this policy.
- Designated Officers- The officers who are responsible to receive any grievances with respect to implementation of this policy.

5. Employment Opportunities & Practices

Following is the list of indicative practices and guidelines towards implementation of this policy and may contain any other relevant process followed in the Company.

- Access to work and ensuring applicable enabling conditions of working environment.
- Diversity of the community is recognized, valued, and respected.
- Training and development opportunities to enhance career growth.
- Access to conditions and benefits (including compensation) of employment for all employees is fair and equitable.
- Promotions based on merit as per the internal policies of the Company.
- Support in acquiring higher skills or education.
- Relevant support in offering time off for treatment and therapy.

- An employee's request for extra leave, for a reason related to her/his disability, disease will be treated as a request for reasonable accommodation and will be evaluated accordingly.

6. Participation and Inclusion

To implement this policy in its letter and spirit, the Company encourages increased participation of its employees in all aspects and levels across the Company. The Company shall provide a platform for regular communication, consultation and facilitating knowledge sharing with interested groups and individuals on matters regarding equal opportunities.

7. Grievance Reporting and Resolution

Company values the diversity and has taken all necessary steps to ensure diversity is respected by all employees. The company has provided appropriate platform to raise any concern, grievance or voice against any kind of discrimination. In accordance with this, the violation of this policy or any clause of this policy would be reviewed under the Disciplinary Mechanism of the Company and may attract consequences based on the severity of the violation.

- Any aggrieved person can raise his or her grievance / make complaint to the "Designated Officers" appointed as per clause 9 of the policy through a written complaint or through an email along with the copies of evidence, if available in the form or documents or any other form.
- We foster culture of "speak up" in a timely manner wherein employees are encouraged to share their concerns without fear of retaliation or penalty. In line with that, for the purpose of this policy, the complaint should be raised within 3 (three) months from the date of the incident and in case of a series of incident(s), within a period of 3 (three) months from the date of the last incident. As an exception, we are open to evaluating cases that is deemed beyond 3 months from the date of act of violation (to be evaluated on case-to-case basis).
- Depending upon the nature of grievance, the Designated Officer Shall investigate the matter and submit the primary investigation report to the Disciplinary Action Committee within 15 days for further enquiry and resolution.
- The aggrieved person shall fully participate and support any investigation or inquiry initiated by the Disciplinary Committee.
- The Disciplinary Action Committee shall endeavor to decide the matter based on the investigation report within 30 days of its receipt and share its outcome

with the Designated Officer, who in turn is the authority responsible to share with the aggrieved person.

8. Designated Officers

For the purpose of this policy, the respective Designated Officers have been assigned and mentioned below:

Entity	Designated Officer
Nuvama Wealth And Investment Limited	Natasha Patel
Nuvama Custodial Services Limited	Vineet Sethi
Nuvama Wealth Finance Limited	Suvashree Rebello
Nuvama Clearing Services Limited	Vineet Sethi
Nuvama Wealth Management Limited	Vineet Sethi
Nuvama Asset Management Limited	Vineet Sethi
Nuvama Capital Services (IFSC) Limited	Vineet Sethi
Nuvama And Cushman & Wakefield Management Private Limited	Vineet Sethi

In absence of any appointed Designated officer, Chief Human Resources Officer will act as Designated Officer.

No person who is a complainant, witness, or defendant in the complaint of violation of the Policy can act as a Designated Officer or be a part of the Disciplinary Committee overseeing the investigation

9. The Disciplinary Committee – The Company has a Disciplinary Mechanism in place which provides for the Disciplinary Committee to look into matters listed in but not limited to Annexure 1 of the Disciplinary Mechanism.

1. Non-Retaliation

The aggrieved person or any person who in good faith has shared the grievance or participated in the enquiry or has provided information pertaining to the incident/s of discrimination shall be protected from any kind of retaliation and Company will observe zero tolerance in the case of any such retaliation. Individuals engaging in retaliatory conduct or wherever the outcome of the redressal process has concluded that the complaint has been made to malign or disgrace the image of any person or Company, will be subject to appropriate disciplinary action by the Company.

2. Review of the Policy

The policy shall be reviewed and amended by the Company as and when required in its discretion or basis any statutory changes that are applicable to the Company.

3. Policy Communication & Awareness

This policy is made available on intranet to all employees and is uploaded on the Internal Website of the Company.