

EQUAL OPPORTUNITY POLICY

1. PREAMBLE AND OVERVIEW

- 1.1. Aavas Financiers Limited (“**Aavas**”) is committed to promote inclusion and diversity among its employees and aims to create a harmonious workplace for all of its employees without discrimination on the basis of their gender, nativity, community, religious beliefs, physical and mental ability, in order to motivate our employees to achieve their full potential.
- 1.2. The objective of this equal opportunity policy (“**Policy**”) is to provide for an equal employment opportunity to people from all sections of society including but not limited to differently abled people in Aavas and make Aavas an inclusive workplace.
- 1.3. This Policy has been formulated in compliance with the Rights of Person with Disability Act, 2016 (“**Act**”) and the Rights of Person with Disability Rules, 2017 (“**Rules**”) as amended from time to time.
- 1.4. This Policy, as amended from time to time, will be effective from 1st April, 2022.

2. POLICY STATEMENT

- 2.1. Aavas is committed to comply with the provisions of the Act and the Rules not just in letter but also in spirit. Aavas is also committed to eliminate all forms of unlawful discrimination including but not limited to direct/indirect discrimination, bullying and harassment of Person with Disability.
- 2.2. Aavas has always worked for the benefit of the Person with Disability associated with the organization and has ensured that all the facilities, services, information and technologies, along with the allied privileges will enable the Person with Disability to effectively discharge her/his duties.
- 2.3. In situations, where the person has incurred the disability during the term of the employment, then in such case, he’s given the option to continue at the same rank, and if the same task cannot be performed by such person anymore, then Aavas strives to invests in upskilling the person along with creating opportunities for such person, if not otherwise available.

3. APPLICABILITY

- 3.1. This Policy covers all Person with Disability i.e. all employees, contractual employees, interns, trainees of Aavas as well as job applicants applying for a job at Aavas etc. It is clarified here that this Policy also covers those employees who acquire a disability during their employment.
- 3.2. This Policy is applicable on every facet and aspect of employment, including but not limited to recruitment, training, working conditions, pay, transfers, employee benefits, and career growth.

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4. DEFINITIONS

- 4.1. **“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.
- 4.2. **“High Support”** means an intensive support, physical, psychological and otherwise, which may be required by a person with benchmark disability for daily activities, to take independent and informed decision to access facilities and participating in all areas of life including education, employment, family and community life and treatment and therapy.
- 4.3. **“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.
- 4.4. **“Reasonable Accommodation”** means necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden in a particular case, to ensure to Person with Disability the enjoyment or exercise of rights equally with others

5. FACILITIES

5.1. List of Positions identified and Selection Process:

- (a) At Aavas, all the positions are open for all types of people, able or disabled.
- (b) The selection process at Aavas is the same for all the candidates including the Person with Disability however the process followed for the evaluation of the Person with Disability is provided with reasonable flexibility, as required for a fair evaluation of such person.
- (c) Aavas is an equal opportunity employer which will be communicated through all the literature or advertisements in relation to the recruitment process.
- (d) Employment at Aavas is based on merits and not on any personal individual attributes.
- (e) Further, all development and promotional opportunities are based on the performance and potential of the employees as per business requirements.

5.2. Other Facilities

- (a) Aavas is committed to provide Reasonable Accommodation and High Support to all the Person with Disability, whether applicants or employed, enabling them to facilitate the smooth and equal

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process of selection and promotions as well upon employment, to perform their duties effectively.

- (b) Aavas endeavours to make all company events and meetings inclusive by ensuring that the place of meetings and events are in compliance with the accessibility standards with a provision of Reasonable Accommodation being available to Person with Disability.
- (c) Aavas ensures in providing suitable facilities and infrastructure to Person with Disability enabling them to easily access such facilities and privileges and effectively discharge their duties in the establishment.
- (d) Any new facility that is built, renovated, leased, or rented by Aavas is evaluated for compliance with accessibility standards at different stages of the building construction for the convenience of the Person with Disability.
- (e) Aavas will endeavour to post the Person with Disability to a place where the employee being a Person with Disability can work without any barriers and can utilize their skills at the optimum level. In doing so, Aavas shall also consider the preference given by the concerned person subject to the business requirement.

6. GOVERNANCE FRAMEWORK

6.1. Human Resource Department

The Human Resource Department of Aavas (“**HR Department**”) will have the functional responsibility for ensuring compliance with the provisions of this Policy. The HR Department should proactively take steps to ensure that all employees are sensitized and there is no Discrimination in recruitment, training, career development and other aspects of employment.

6.2. Liaison Officer

- (a) In accordance with the provisions of the Act, Aavas has appointed a Liaison Officer who shall be responsible for taking initiative and providing the requisite support needed to realize the goals of an inclusive and accessible workplace through the facilities, technologies, and Reasonable Accommodation.
- (b) The responsibilities of the Liaison Officer include:
 - (i) Executing the action plan for sensitization and making the workplace along with other relevant technology systems accessible for Person with Disability by liaising with the various departments at Aavas.
 - (ii) Ensuring spreading the awareness about the Act, Rules and this Policy amongst all the employees of Aavas.
 - (iii) Developing proactive strategies to prevent Discrimination and harassment of Person with Disability at Aavas.

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- (iv) Share the progress report with the HR Department of Aavas with respect to this Policy, as and when required by the HR Department.

7. MAINTENANCE OF RECORDS

- 7.1. Aavas, shall in accordance with the provisions of the Act and the Rules, collect and maintain records with respect to the following:
 - (a) number of Person with Disability who are employed and the date from when they are employed;
 - (b) name, gender and address of Person with Disability;
 - (c) nature of disability of such persons;
 - (d) nature of work being rendered by such employed Person with Disability; and
 - (e) the kind of facilities being provided to such Person with Disability
- 7.2. Any employee can ask the HR Department to change the information provided in the Form at any time during her/his tenure along with sufficient proof.
- 7.3. Aavas is committed to keep the information shared by any employee concerning his/her disability confidential. Further, such information will be maintained by the HR Department in a separate file and not in her/his official personnel file. However, Aavas, including but not limited to Liaison Officer and/or its HR Department may disclose the information in any of the following events:
 - (a) Such information is required under the Act, Rules and/or other applicable laws.
 - (b) Such information is required in respect of a proceeding, order, or judgement of the court of law or tribunal.
 - (c) To facilitate the Person with Disability including but not limited to any security personnel in order to facilitate obtaining any necessary support during an emergency or provide to Liaison Officer to provide or allow any facilities or Reasonable Accommodations.
 - (d) In case of any medical emergency to medical professionals in relation to such person with a disability.

8. GRIEVANCE MECHANISM

- 8.1. Any Policy violation i.e., when any Person with Disability are discriminated against or harassed, or any such Person with Disability is not provided with Reasonable Accommodation or denied access to any facility of Aavas, will be regarded as a grievance.

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- 8.2. Any Person with Disability facing accessibility issues shall report or write to the HR Department.
- 8.3. Every employee is encouraged to report any act done in contravention of this Policy. Such acts shall be reported as per the Aavas grievance redressal process. In furtherance, Aavas commits to resolve any such concerns and complaints raised.
- 8.4. On enquiry, if the employee against whom the complaint has been made is found guilty of discriminatory behaviour, she/he will be subjected to disciplinary actions as per norms.

9. MISCELLANEOUS PROVISIONS

- 9.1. Aavas has the right to add/alter/amend this Policy as and when required to do the same in accordance with the applicable Act, Rules, or government orders, notifications or any such other direction issued in relation to this Policy. The HR Department is empowered to interpret and clarify the provisions of this Policy.
- 9.2. This Policy will be available to all employees on the website of Aavas.
- 9.3. All employees shall have the responsibility to comply with this Policy. All the employees of Aavas shall maintain the work environment in a manner, to ensure that it is free from Discrimination and harassment and encourages inclusion and respect for others.
- 9.4. Any term not defined under this Policy shall be construed as per the definitions provided under the Act and Rules.
- 9.5. In case of a conflict between the Act, Rules and this Policy, the provisions of the Act and Rules shall prevail.

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