

**SEHAJ SYNERGY TECHNOLOGIES PRIVATE LIMITED
EQUAL OPPORTUNITIES / ANTI-DISCRIMINATION POLICY**

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SEHAJ SYNERGY TECHNOLOGIES PRIVATE LIMITED
EQUAL OPPORTUNITIES / ANTI-DISCRIMINATION POLICY

1 INTRODUCTION

- 1.1 Sehaj Synergy Technologies Private Limited (the “**Company**”) is committed to promoting equal opportunities in all facets of employment, and ensuring that all employees of the Company are treated equally, and do not face any discrimination or harassment. The Company is committed to providing equal opportunities without any discrimination on grounds of gender, race, colour, disability, sexual orientation, religion, origin or nationality.
- 1.2 This policy (the “**Policy**”) sets out the Company’s approach to ensure that all its employees are provided equal opportunities, and to foster an equal opportunities and inclusive workplace culture. The Company intends to make its employees, members and clients aware that any discrimination or harassment is unacceptable and the Company takes strict action against any discrimination or harassment.

2 WHAT IS DISCRIMINATION?

- 2.1 Discrimination is any negative action or attitude directed towards someone on the basis of any Protected Characteristic. It may be intentional or unintentional. Protected characteristics (“**Protected Characteristics**”) include but are not limited to:
- (a) Gender, gender identity, gender expression;
 - (b) Religion, caste, class;
 - (c) Sexual orientation;
 - (d) Race, ethnicity;
 - (e) Colour;
 - (f) Physical or mental disability;
 - (g) Age;
 - (h) Economic background;
 - (i) Physical characteristics or attributes;





- (j) Medical reasons;
- (k) Origin; and
- (l) Nationality.

2.2 This is not an exhaustive list, but here are some instances which the Company considers discrimination:

- (a) Hiring managers purposely disqualifying candidates based on Protected Characteristics.
- (b) Employees not being given a fair opportunity for a training opportunity, promotion or otherwise by reason of a Protected Characteristic.
- (c) Employees making sexist or racist comments or comments against a particular community or religion or comments against any person using one of the Protected Characteristics as the basis for discrimination.
- (d) Exclusion or isolation of a co-worker on the basis of a Protected Characteristic.

3 WHAT IS HARASSMENT?

3.1 Harassment is a form of unwanted conduct that is known, or reasonably ought to be known, to be unwelcome. It can involve words or actions that are known or should reasonably be known to be offensive, embarrassing, humiliating, demeaning or unwelcome, and related to any of the Protected Characteristics.

3.2 It is important to note that people have different standards of what they might construe as harassment. Hence, what might not constitute harassment to one employee, may be harassment to another. It is therefore advisable to refrain from any conduct which may be construed in the least bit as harassment. The Company has a separate policy specifically relating to anti-sexual harassment, and any form of sexual harassment or alleged sexual harassment and the consequences therefore will be dealt with under that policy. A copy of the anti-sexual harassment policy adopted by the Company can be accessed at www.npstx.com.

3.3 Examples of harassment include but are not limited to:

- (a) Remarks, jokes or innuendos related to a person's race, gender identity, gender expression, sex, disability, sexual orientation, creed, age, physical appearance, or any other ground.





- (b) Singling out a person for humiliating or demeaning “teasing” or jokes because of a Protected Characteristic.
- (c) Posting or circulating offensive pictures, graffiti or materials, whether in print form or via e-mail or other electronic means.
- (d) Comments ridiculing a person because of a Protected Characteristic. For example, this could include comments about a person’s dress, speech or other practices that may be related to their sex, race, gender identity or creed or other Protected Characteristics.

If a person does not explicitly object to harassing behaviour, or goes along with it, this does not mean that it is acceptable. The behaviour could still be considered to be harassment under this Policy.

4 COMPANY’S POLICIES AND PROCEDURES

- 4.1 The Company’s practices are non-discriminatory in all respects and do not discriminate, whether in respect of recruitment, selection, training, development or promotion. All decisions will be made solely on individual merit and qualifications.
- 4.2 The Company discourages any form of discrimination or harassment by its employees, and takes strict cognizance of any act of discrimination or harassment committed.
- 4.3 To ensure the Company’s commitment towards an equal opportunity, discrimination and harassment free workplace, the Company takes the following steps, including:
 - (a) Ensuring equal opportunities for applicants and employees, including in respect of recruitment, training, development or promotion. This includes having processes and guidelines which the Company follows for recruitment, training, development or promotion.
 - (b) The Company offers similar pay and benefits to persons in similar positions without discriminating against any person on the basis of a Protected Characteristic.
 - (c) Conducting regular trainings for the Company’s employees about this Policy and its practices thereunder.
 - (d) Ensuring an inclusive workplace for the Company’s employees. The Company promotes appropriate standards of conduct at all times.





- (e) Regularly monitoring organizational systems and the provisions of this Policy to ensure compliance with industry good practice.
- (f) Taking strict disciplinary action against any employee who is found to be engaging in an action which constitutes discrimination or harassment.
- (g) The Company is in compliance with all requirements under applicable law in respect of anti-discrimination, including the Rights of Persons with Disabilities Act, 2016. The Company maintains necessary records as required under the said Act containing information of the persons with disabilities who are employed in the Company.
- (h) The Company shall undertake all necessary measures required to ensure that the Company has appropriate facilities in place to enable a 'person with disability' (as defined under the Rights of Persons with Disabilities Act, 2016) to work in the workplace. The Company has undertaken requisite measures, as set out in **Annexure 1**, as necessary under the Rights of Persons with Disabilities Act, 2016 and rules thereunder in relation to employment of any person with disability.
- (i) [The Company has appointed [Mr. Ramesh Verma as the liaison officer to look after the recruitment of persons with disability.]

5 EMPLOYEE RESPONSIBILITIES

- 5.1 All employees as individuals are expected to uphold and abide by this Policy. Employees should refrain from any form of harassment or discrimination, and cooperate fully in any investigation of a harassment or discrimination complaint. Each employee is encouraged to sensitize themselves about this Policy.
- 5.2 It will be the duty of management and persons in leadership positions to educate persons who are working for them about this Policy. Managers and supervisors have the additional responsibility to act immediately on observations or allegations of harassment or discrimination.

6 REMEDY

- 6.1 If any employee has been subject to any form of discrimination, harassment or victimization, such employee may approach the Company Compliance Officer appointed by the Company or the Grievance Redressal Committee ("**Committee**") constituted by the Company to address such complaints by the employee. The



appointment of the Company Compliance Officer/composition of the Committee and process for complaint have been provided under the Code of Business Practices adopted by the Company (“Code”), which can be accessed at www.sstpl.in

6.2 No employee who brings a complaint in good faith will suffer victimization. However, if the complaint is untrue and has been brought in bad faith, disciplinary action will be taken against such employee.

7 QUESTIONS, SUGGESTIONS OR COMPLAINTS

7.1 If any of the employees have any questions on this Policy, such questions may be addressed to the Company Compliance Officer or to the employee’s supervisor.

7.2 If any of the employees of the Company face discrimination or harassment as a result of any of the Company’s policies, they are encouraged to bring up such issue with the Company Compliance Officer. The Company aims to promote an equal opportunities workplace and will strive to resolve any such complaints received.

8 REVIEW AND AMENDMENTS

This Policy shall be subject to review, from time to time. Any amendments to this Policy shall be in writing and effective upon a resolution being passed by the board of directors of the Company approving such amendments. Brief details of each amendment shall be in the format specified below:

Date	Version	Description of Amendments

Effective Date: 15.10.2021



**ANNEXURE 1 (LIST OF MEASURES UNDERTAKEN BY THE COMPANY FOR
PERSONS WITH DISABILITY)**

The facilities and amenities provided by the Company to facilitate persons with disability to discharge their duties are as follows:

1. Company will identify the type of job which could be easily performed by persons with disability.
2. Induction training programmes for the persons with disability shall be imparted together with other employees.
3. Persons with disability will be provided with aids and appliances which are suitable to their needs and the Company shall ensure that they are provided assistance on high-tech / latest technology led assistive devices in accordance with their requirements to improve their efficiency.
4. Company shall ensure to provide easy accessibility and barrier free environment for persons with disability as per the provisions of the PWD Act, and shall take special steps to provide barrier free and accessible work stations, access from main entrance to their work stations and access to common utility areas such as Toilets, canteens etc. Lifts/elevators.
5. As far as possible, the persons with disabilities may be exempted from the rotational transfer policy/transfer and be allowed to continue in the same job, where they would have achieved the desired performance.

Ramesh Kumar
Auth.
Signatory