

Equal Employment Opportunity, Diversity & Inclusion and Anti-Discrimination Policy

Authority	Name & Designation
Approved by	Board of Directors
Reviewed by	Sandhya Rani G Chief Human Resource Officer
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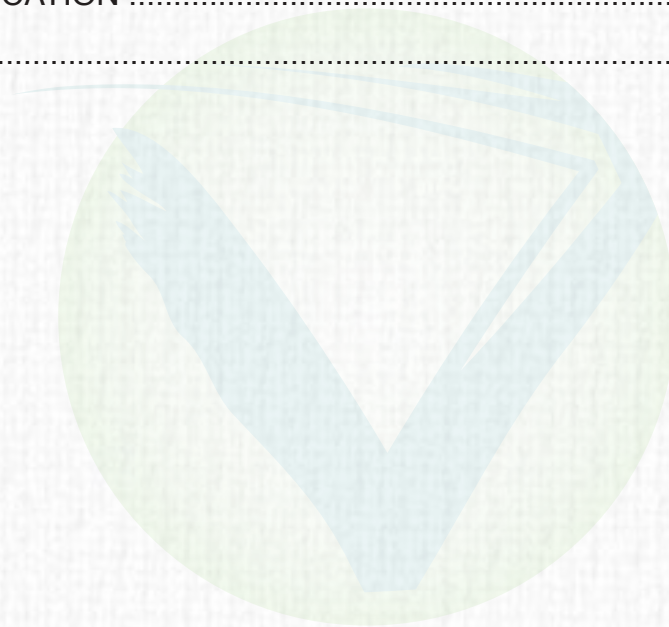
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AMENDMENTS to the STANDARD, if any:

- Shall be made, only by the policy owner as approved by the Management.
- Shall be incorporated in all the controlled copies and entered in the Document Control Log enclosed in the template

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1. PURPOSE

Vidal Health Insurance TPA Pvt Ltd. referred as “**The Company**” is an equal opportunity employer. We have been and will continue to be committed to recruiting, hiring, promoting, and training qualified individuals for positions at all levels within the organization. We will, therefore, maintain our commitment to and support of equal employment opportunities for all individuals without any discrimination on the grounds of age, color, disability or veteran status, marital status, nationality or ethnic origin, race, religion, sex, sexual orientation, gender identity, or disease (viz. HIV/AIDS) (“Discrimination Characteristics”).

The Company strives to maintain a work environment that is free from any harassment based on the above considerations. This Equal Employment Opportunity and Non-Discrimination Policy is subject to applicable laws and regulations and is based on the qualifications and merit of an individual.

This policy is consistently applied throughout the period of employment of the individual, right from the recruitment process to retirement.

The company maintains a Zero Tolerance policy and is opposed to any form of harassment or retaliation whatsoever, including sexual orientation, racial, ethnic, or religious harassment, regardless of whether the harassment or retaliation occurs directly or indirectly. Verbal or physical conduct directed at a person's race, color, religion, gender, national or ethnic origin, age, sexual orientation, gender identity, disability may constitute harassment and is strictly prohibited.

Our commitment to equal employment opportunity and non-discrimination extends to any other protected classes which may exist under applicable laws. This statement reaffirms our dedication to the principles of equal employment opportunity and non-discrimination, and it is our expectation that all employees will lend their full support to furthering the Company’s objectives by ensuring sincere implementation of this policy.

2. WORKPLACE

For the purposes of this policy, the expression ‘workplace’ or ‘at work’ is not confined or limited to the actual working place of the employees, in the sense of the physical space in which paid work may be performed as per the prescribed duty hours. ‘Workplace’ or ‘at work’ would include inter alia, office parties, any place visited by employees, arising out of or during the course of employment (including transportation provided, if any), work-related social functions, phone calls, sending messages through cellular phones or email from home, even on an off day, or other contacts outside office hours and work-related interactions.

3. POLICY AT VIDAL HEALTH INSURANCE TPA PVT LTD

The company's people have been, and will continue to be, the key to our success. The company strongly supports and recognizes its responsibility to provide equal employment opportunities to all qualified individuals. The company is committed to promoting equal employment opportunities and a workplace that is free of all forms of discrimination. All employment decisions are made purely on merit.

The organization aims to provide equal employment opportunities to qualified individuals. The policy of equal opportunity encompasses all aspects of employment relationship which includes hiring, promotion, transfer, selection for training opportunities, wage and remuneration and application of benefit plan and policies. It applies to all individuals involved in the operations of the company and prohibits un-lawful discrimination by any individual in the organization, including leadership/management, managers and co-workers.

The company also promotes and encourages employment for candidates who are differently abled and ensure they are not discriminated.

The company strives to create an inclusive environment which embraces differences and fosters inclusion. Our anti-discriminatory policies ensure that employees feel safe, confident and comfortable at work.

4. POLICY SCOPE

This policy applies to all employees of the company. The company's aims to create employment opportunities such that all employees can apply themselves to their full potential.

5. OBJECTIVE

5.1. The Organization ensures that:

- Employees do not suffer unfair discrimination at workplace.
- Everyone has an equal chance when applying for jobs, promotions and training opportunities.
- Recruitment procedures and selection criteria for appointment or engagement of a person as an employee shall be on a non-discriminatory basis.
- Uniform application of labour laws in the organization.
- Respectful communication and cooperation between all employees.
- Ensure that all generations are welcomed and skills & strengths are utilised.
- Inclusion of different ways of thinking, viewpoints, experiences, skill sets & personality traits. This is achieved through Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
- Employer and employee contributions to the communities we serve to promote a greater understanding and respect for diversity.

An anti-discrimination policy is a series of processes and procedures put in place by the company to maximize diversity and Inclusion in the workplace and to promote equal opportunities. The company and its employees shall try to create a workplace that is free from discrimination in their employment practices against any potential or existing employees, and shall not discriminate on a person's:

- Cultural or social beliefs such as religious
- Physical features
- Race , ethnicity and nationality
- Marital status
- Gender identity and expression
- Sexual orientation
- Spiritual, traditional or customary beliefs
- Socio-economic status

5.2. Diversity & Inclusivity and Equal opportunity initiatives are applicable but not limited to the following activities will be conducted in a uniform manner:

- Recruitment procedure
- Selection criteria
- Employment
- Promotion and transfer
- Training and staff development
- Working condition provisions
- Wages and salary administration
- Employee benefits and application of policy
- Any other benefits or process applicable to the employees.

6. POLICY GUIDELINES

6.1. Equal opportunities

The company provides equal opportunities to its employees without regard for the Discrimination Characteristics. All actions of the company with regard to its employees (in relation to their employment, compensation, benefits, transfers, leave(s), layoffs, training, education, and assistance) will be made in a transparent manner and without regard for the Discrimination Characteristics.

Any person who believes themselves to have been subjected to discrimination on the basis of the Discrimination Characteristics is encouraged to bring the matter to the attention of the Chief Human Resource Officer of the company at the earliest practical opportunity.

6.2. Non-discrimination

The company is committed to providing a work environment for its employees that is free from any form of discrimination.

- In the event that any discriminatory practices are identified, appropriate steps will be taken to address the same.
- Any person who believes themselves to have been subjected to discrimination on the basis of the Discrimination Characteristics is encouraged to bring the matter to the attention of the Chief Human Resource Officer of the company at the earliest.
- Any discriminatory action or behavior that constitutes an offence under the Company's policies will be dealt with in accordance with applicable disciplinary procedures.
- The company prohibits discrimination against any person with a disability in any matter related to employment, in line with the Rights of Persons with Disabilities Act, 2016 ("Act") and the Transgender Persons (Protection of Rights) Act, 2019.
- With reference to individuals affected by adverse medical conditions such as HIV & AIDS, the following additional protective measures shall apply:
 - An individual employee/applicant affected by HIV/AIDS will be considered at par with any other illness in terms of employee policies and benefits, including health and life insurance, disability benefits, and leaves of absence.
 - No employee shall, either orally or in writing or in any other visible form, communicate, disseminate, or publish any information or material which may result in hatred, insult, discrimination, and/or physical abuse of an employee/individual affected by HIV/AIDS.
 - No employee shall victimize an individual/employee for raising a complaint under the HIV/AIDS (Prevention & Control) Act, 2017 through any of the grievance redressal mechanisms mentioned in this policy.
 - Any information obtained is voluntary, will be kept confidential, and will be used in accordance with applicable laws. Refusal to provide information will not subject an employee or applicant to any adverse treatment. Employees and applicants will be protected from coercion, intimidation, interference, discrimination, or retaliation for filing a complaint or assisting in an investigation under the Rights of Persons with Disabilities Act, 2016 ("Act"), the HIV/AIDS (Prevention & Control) Act, 2017, and the Transgender Persons (Protection of Rights) Act, 2019.
- No opportunity shall be denied to persons with disabilities merely on the ground of disability.

6.3. Grievance Redressal Mechanism

At any time, an employee or a prospective employee feels that they have been discriminated under the Discrimination Characteristics, may utilize the current policy or Code of Conduct. Further, any person who feels uncomfortable or affected may write to **reports@vidalhealth.com**.

7. COMPLAINT PROCESS AND PROCEDURES

7.1. Complaints Procedures:

The person can consult and file complaint with HR department or email to Complaints Committee reports@vidalhealth.com. The complaint will be investigated by unbiased, responsible, senior officials of the company. The complaints committee members are as below:

Chief Human Resource Officer-HR
Chief Finance Officer
IT Software Head
Legal Head
*Additional Committee Members may be included from other relevant business teams to be determined on a case-to- case basis, based on relevance.

Details of complaints committee will be published to all employees and kept available on physical workplace and intranet notice boards.

7.2. Fairness and Confidentiality: Investigation or enquiry into complaint would be conducted with due respect for the rights of both the complainant and the respondent. The entire process would be impartial and without any bias for or against any party. The Company stands committed to maintaining confidentiality to the extent reasonably possible. To ensure confidentiality, the information obtained would be confined to the smallest group possible.

Further, all the members of the Complaints Committee have signed Confidentiality Agreements which are strictly binding. The importance of confidentiality would be emphasized to the witnesses as well. Responsibility to maintain confidentiality would lie on the complainant also. The complainant, thus, would also become part of the confidentiality process and should not discuss the issue with other persons except where it is necessary for substantiating the complaint or otherwise to secure a fair investigation into the complaint or discussing the issue with a counsel or the Complaints Committee. Breach of confidentiality on the part of employees or the committee members involved in the investigative process would render them liable for disciplinary action. While it is important to maintain full confidentiality throughout the investigation/enquiry, the respondent would be provided with all relevant details of the complaint made against him or her and a reasonable opportunity, to respond and defend himself.

7.3. Communication: The Company would give its employees an early introduction to this Policy. The Company would also take all requisite steps to ensure effective dissemination of this policy.

7.4. Training: The Company recognizes the importance of training its employees, particularly supervisors and managers, so as to better equip them to effectively report and be sensitive to the cases or complaints arising out of this policy. The main objectives of such training would be to make the employees more sensitive to, and aware of the problem of discrimination and to understand the causes of discrimination as an issue; to enable them to take an objective and sensitive attitude to complaints of discrimination; impressing on them the need to maintain confidentiality; training them about their responsibility and the procedures they should follow on receiving a complaint of discrimination or on witnessing such conduct, and ensure that their workspace is devoid of discrimination. Further, to draw their attention to the dangers of exaggerated reckless and malicious complaints.

8. POLICY COMMUNICATION

This Policy will be available to all employees via the company's HRMS. Awareness efforts will be made by including training courses.

9. REVIEW

The policy shall be reviewed annually and any changes in applicable laws relating to this policy shall be incorporated into this policy. Any changes introduced to this policy must be approved by the Board of Directors. Whilst, the Company has made best efforts to define detailed procedures for implementation of this policy, there may be occasions when certain matters are not addressed or there may be ambiguity in the procedures. Such ambiguities will be resolved in line with the broad intent of the policy.

