



**EQUAL  
OPPORTUNITY  
POLICY**



**SONATA FINANCE PRIVATE LIMITED**

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## **POLICY PREFACE**

The Government of India notified “The Rights of People with Disabilities Act, 2016” (RPWD) and “The Transgender Persons (Protection of Rights) Act, 2019” to provide protection to the Rights of Persons with Disabilities and to Transgender Persons employed or otherwise hired by the Company and for matters connected therewith or incidental thereto. Sonata Finance Private Limited (“the Company/ SFPL”) has framed this Equal Opportunity Policy in compliance with the requirements of “The Rights of People with Disabilities Act, 2016” and “The Transgender Persons (Protection of Rights) Act, 2019”.

At SFPL, we recognize the value of a diverse workforce and are committed to providing equal opportunities in employment thereby creating an inclusive workplace and work culture in which all employees are treated with respect and dignity.

We constantly strive to ensure that our workforce is representative of all sections of the society. We believe that, by doing so, we would be better equipped to develop and deliver inclusive growth to all the employees of the organization along with achieving business excellence.

Through this policy the Company shall proactively work towards equal opportunity in all aspects of employment of Persons with Disabilities and Transgender Persons including the hiring/selection process, promotions, transfers, provision of training opportunities, compensation, employee benefits.

The Managing Director along with the Liaison Officer has the overall responsibility for the effective operation and implementation of the equal opportunity policy.

## **POLICY STATEMENT**

SFPL is committed to eliminating all forms of unlawful discrimination (which includes direct discrimination, indirect discrimination and denial of reasonable accommodation), bullying and harassment of people with disabilities and transgender persons.

At SFPL, we continuously strive to ensure that all our facilities, technologies, information and privileges are accessible to people with disabilities and transgender persons.

We encourage differently abled candidates and transgender persons to apply for any job opportunity arising within the organization. Our decisions on employment, career progression, training or any other benefits are solely based on merit. We follow an inclusive evaluation process by ensuring that a person with disability is provided with such suitable flexibility and accommodation that may be required so that she/he may be evaluated fairly. Any information shared by employee on disability/medical condition/sexuality/gender identity shall remain confidential.

If an employee acquires a disability during her/his employment tenure she/he can return to work at the same rank as before. In case the employee is unable to perform the assigned job, the organization will invest in re-skilling the employee for another suitable equivalent position.

## **TERMS DEFINED**

Some relevant terms of the Rights of Persons with Disabilities Act, 2016 and The Transgender Persons (Protection of Rights) Act, 2019 are stated below:

**1. *Discrimination:***

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.

**2. *Person with benchmark disability:***

It means a person with not less than forty per cent of a specified disability where specified disability has not been defined in measurable terms and includes a person with disability where specified disability has been defined in measurable terms, as certified by the certifying authority.

**3. *Person with disability:***

It 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. *Reasonable accommodation:***

Reasonable Accommodation means necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden in a particular case, to ensure to persons with disabilities the enjoyment or exercise of rights equally with others.

**5. *Special Employment Exchange:***

It means any office or place established or maintained by the Government for the collection and furnishing of information, either by keeping of registers or otherwise, regarding-

- i. Persons who seek to engage employees from amongst the persons with disabilities.
- ii. Persons with benchmark disability who seek employment
- iii. Vacancies to which persons with benchmark disabilities seeking employment may be appointed

**6. *Specified Disability:***

Specified Disability shall mean and cover all the disabilities as specified in the Rights of Persons with Disabilities Act, 2016.

**7. *"Transgender Person"***

means a person whose gender does not match with the gender assigned to that person at birth and includes trans-man or trans-woman (whether or not such person has undergone Sex Reassignment Surgery or hormone therapy or laser therapy or such other therapy), person with intersex variations, genderqueer and person having such socio-cultural identities as kinner, hijra, aravani and jogta.

## **POLICY DETAILS**

### **1. Rights and Entitlements**

Equal Opportunity Policy of the Company aims at ensuring that none of the employees with disability is discriminated against on the ground of disability, unless it is shown that the impugned act or omission is a proportionate means of achieving a legitimate aim.

The Company shall not discriminate with respect to any aspect of the employment relationship including the hiring/selection process, promotions, transfers, provision of training opportunities, compensation, employee benefits, termination or retirement policies, and disciplinary practices.

Further, the with regard to Transgender persons, the Company shall maintain confidentiality of the gender identity of the employees except where the Company or its representatives is required to disclose such information to government officials or in order to cater to or provide support to such Employees.

### **2. Positions for Disabled Persons and Transgender Persons**

In SFPL, the hiring for all the positions is purely based on merit and the candidates are evaluated based upon their skills and competence. Flexibility and accommodations will be provided to persons with disabilities on an individual basis.

Pursuant to the Persons with Disabilities Rules, 2017, all establishments are required to identify posts that are suitable for Persons with Disabilities. Further, in addition to Persons with Disabilities Rules, 2017, Transgender Persons (Protection of Rights) Rules, 2020 require all establishments to implement all measures for providing a safe working environment and to ensure that no person with disabilities or transgender person is discriminated against in any matter relating to employment and other related issues. At SFPL, all positions of employment, internships, secondments, etc, are open to everyone, as long as they are capable and competent at carrying out the essential functions of the position.

### **3. Manner of selection**

#### ***a) Vacancy advertisement and application***

- Wherever possible, all vacancies will be advertised internally and externally.
- Wherever possible, vacancies will be notified to colleges, polytechnics and disability organisations.
- All vacancy advertisements will include an appropriate short statement on equal opportunities for people with disabilities and transgender persons.
- Selection criteria (job description and employee specification) will be kept under constant review to ensure that they are non-discriminatory and that they relate purely to the skills needed for the job and nothing else.
- Application forms will be made available in alternate formats, based on request.

Employees are requested to report the existence of a disability or certificate of identity issued by the District Magistrate under the Transgender Rules to the Liaison Officer at the time of joining the organization, in order to ensure protection of their rights under this Policy.

#### 4. Facilities and Amenities

The Company shall, as far as possible, endeavor to provide such facilities and amenities to Persons with Disabilities and Transgender Persons to enable them to effectively discharge their duties in the Company. The Company shall take into account the specific and special needs of Person with Disabilities and Transgender Persons employed by it and ensure that its facilities (including physical/digital infrastructure, information and communication technology, safety and security and transportation system, if any, provided by the Company) are easily accessible.

- a) **Physical Infrastructure:** SFPL shall endeavor to ensure that it provides barrier-free accessibility to Persons with Disabilities and that its physical infrastructure is disabled-friendly. Further, the Company shall endeavor to ensure that it provides basic infrastructural facilities to Transgender Persons. Towards this end, the Company shall, on a continuous basis, liaise with service providers, facility managers or such other appropriate persons who manage the premises within which its offices are located, in order to endeavor to observance of the accessibility standards prescribed under the Act in relation to its physical infrastructure. On a case to case basis, the Company may also opt to provide assistive devices for the convenience of Persons with Disabilities. Employees facing accessibility issues in relation to the physical infrastructure of the Company or with regard to any other issue, are requested to report the same to the Liaison Officer. Employees may report accessibility issues relating to the Company's information and communication technology, to the Liaison Officer.
- b) **Digital Infrastructure:** SFPL continuously endeavors to ensure that all our documents, communication and information technology systems adhere to the accessibility standards. We shall always ensure that only accessible technologies are procured. Any employee facing accessibility challenges can reach out to the local IT support team.
- c) **Reasonable Accommodation:** SFPL will make reasonable accommodations, whenever necessary, for qualified employees or job applicants who have disabilities, as per The RPWD Act. Such accommodation will be provided:
- 1) to ensure equal opportunity in the application and selection process,
  - 2) to enable an employee with a disability to perform the essential functions of a job, and
  - 3) to enable an employee with a disability and transgender persons to enjoy the same benefits and privileges of employment as non-disabled employees

All documents concerning an employee's reasonable accommodations request would be maintained in the employee's confidential file, separate from the employee's official personnel file.

#### 5. Training and Career development

SFPL will endeavor to provide course materials meant for induction and training in accessible formats on request. The request for reasonable accommodation, such as assistive aids, accessible training venue, accessible materials, interpreter, scribe, etc. shall be placed at least one week prior to the scheduled date of commencement of induction/training.

The company has an accessible and inclusive appraisal process. Any employee/Manager requiring any accommodations for an appraisal process must place a request at least two days in advance.

#### 6. Travel, stay and transport

For official travel, employees with disabilities will be provided accessible modes of transport - air travel (in case road/train travel is inaccessible), and accessible guest houses and hotels and

allowing a personal attendant to travel along, as per our reasonable accommodation guidelines. An employee can place a written/email request for this with the Travel Officer.

**7. Employee Engagement and social inclusion**

SFPL will endeavor to make all company events and meetings inclusive by ensuring that these are conducted at accessible venues with a provision of reasonable accommodation being available to employees with disabilities.

**8. Maintenance of Records**

SFPL will collect and maintain data regarding employees with disabilities in relation to their employment, facilities provided and other necessary information as per The RPWD Act.

All employees will be asked to fill the Voluntary Disability Self Identification Form in order to give information regarding any disability that she/he may have.

Employees are also requested to report disabilities acquired after joining the Company or in case of ceasing of a disability.

An employee can edit the information at any time during her/his tenure. There will be no penalties imposed because she/he did not share information regarding her/his disability earlier. An employee who acquires disability can also edit and update the form.

SFPL respects the privacy of every individual and ensures utmost confidentiality of information /concerns in relation to disability /sexuality/gender identity or any other personal information shared with it by its employees (or potential candidates). However, if the disclosure is mandated under law, then any such disclosure will be handled with utmost confidentiality and in accordance with applicable laws.

***Exceptions to the confidentiality clause:***

- a. Managers/Supervisors may be given information about an employee’s disability for allowing/providing any accommodations.
- b. Security personnel may be given information about an employee’s disability so as to facilitate obtaining any necessary support during an emergency.
- c. Government officials who are investigating the compliance with The RPWD Act and The Transgender Persons (Protection of Rights) Act, 2019, may be given information about an employee’s disability and sexuality

**9. Furnishing of Returns**

The organization shall furnish information in relation to the vacancies appointed for persons with benchmark disabilities as and when they occur to such special employment exchanges as may be notified by the Government, from time to time.

## **GOVERNANCE FRAMEWORK**

The Managing Director is responsible for ensuring that the establishment operates in compliance with The RPWD Act, 2016 and The Transgender Persons (Protection of Rights) Act, 2019 to fulfil the terms of this policy. The HR Head takes a lead in implementing the program and is responsible for planning, monitoring and reviewing its progress to ensure compliance with the policy.

### **1. Liaison Officer**

SFPL has appointed its HR head as a Liaison Officer who will be responsible for taking initiative and providing the requisite support needed to realize the goals of an inclusive and accessible workplace and reasonable accommodation.

*The Liaison Officer is responsible for:*

- Implementing the action plan for making the workplace and IT systems accessible for people with disabilities by liaising with the various departments in the organisation.
- Ensuring that all employees are aware of the Equal Opportunity Policy and know their duties and rights in relation to the Equal Employment Opportunity policy.
- Developing proactive strategies to prevent discrimination and harassment of persons (including disabled persons and Transgender Persons) at the workplace.

All employees have the responsibility to comply with the Equal Opportunity Policy. Managers and team members need to monitor the work environment to ensure that it is free from discrimination and harassment and encourages inclusion and respect for others.

All employees are encouraged to report any incidents of violation of this policy and Managers should act promptly when concerns arise or complaints are made.

### **2. Violations and Reporting**

SFPL has zero tolerance for disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind. Harassment (physical, verbal or mental harassment) is not tolerated in the workplace and in any work-related circumstances outside of work. Complaints and grievances in relation to discrimination or harassment at the workplace and in any work-related circumstances outside of work may be forwarded to:

The Liaison Officer through e-mail communication marked to [neha.singh@sonataindia.com](mailto:neha.singh@sonataindia.com) (HR HEAD) The Liaison Officer shall use best efforts to resolve and address grievances in a timely manner including to prevent any further harm or inconvenience to the Employee.

It is clarified that grievances raised with the Liaison Officer shall not affect any rights or recourse that Employees may have under applicable laws.

No retaliatory action will be taken against any individual for raising concerns as regards this policy. However, any such reporting by an employee if found to be in bad faith or in a false or frivolous manner, will be considered a violation of the code of conduct, and such employee may be subject to disciplinary action.