



**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) to give effect to the United Nations Convention on the Rights of Persons with Disabilities and for matters connected therewith or incidental thereto. Sonata Finance Private Limited (SFPL) has framed this Equal Opportunity Policy in compliance with the requirements of “The Rights of People with Disabilities Act, 2016”.

At SFPL, we recognize the value of a diverse workforce and are committed for 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 alongwith achieving the business excellence.

Through this policy we shall proactively work for achieving at least 5% of our workforce being comprised of people with benchmark disability. To ensure seamless implementation of this policy, SFPL has created a strategic plan and modified the related employee hiring processes.

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.

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

We encourage differently able candidates 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 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.

## **SCOPE OF THE POLICY**

This policy shall cover all the existing employees of the company who acquire benchmark disabilities during the course of their employment and shall also extend for recruitment of the applicants with disabilities.

This policy also applies to all aspects of employment, be it recruitment, training, working conditions, salaries, transfers, employee benefits and career advancement.

## **TERMS DEFINED**

Some relevant terms of the Rights of Persons with Disabilities Act, 2016 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

## **POLICY DETAILS**

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

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

### **2. List of positions identified**

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.

### **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.
- 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.

### **4. Facilities and Amenities**

a) ***Digital Infrastructure:*** SFPL continuously endeavor 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.

b) ***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 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.

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.

The information that an employee shares about her/his disability will be kept confidential. It will be maintained in a separate file and not in her/his personal file.

### *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 may be given information about an employee's disability.



## **8. 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 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**

As per the mandate of The RPWD Act, 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 knows their duties and rights in relation to the Equal Employment Opportunity policy.
- Developing proactive strategies to prevent discrimination and harassment.
- The Liaison Officer will share the progress report with the MD

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.

## **CONCLUSIVE OBJECT OF POLICY**

Our objective is to ensure everyone works in a fair and respectful environment whilst being mindful of others beliefs, backgrounds and viewpoints.

If an employee believes that he is being subject to unfair treatment then he is strongly encouraged to speak with head of Human Resources in the first instance, to resolve the matter as soon as possible.