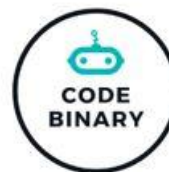


# CodeBinary Initiatives



## Equal Employment Opportunity Policy

This policy applies to all the CodeBinary (“Company”) employees (“employees”) and the operations. CodeBinary, aims to create employment opportunities such that all employees achieve their full potential.

### Overview

CodeBinary recognises that Equal Employment Opportunity is a matter of employment obligation, social justice and legal responsibility. It also recognises that prohibiting discriminatory policies and procedures is sound management practice.

This policy has been designed to facilitate the creation of a workplace culture that maximises organisational performance through employment decisions. These decisions will be based on real business needs without regard to non-relevant criteria or distinctions, and will ensure that all decisions relating to employment issues are based on merit.

This Equal Employment Opportunity Policy is consistently applied throughout the period of employment of the individual right from the recruitment process till superannuation.

### Purpose

This policy is designed to ensure that CodeBinary complies with all of its obligations under the relevant legislation.

### Policy

CodeBinary is an equal opportunity employer and will provide equality in employment for all the people employed or seeking employment. Every person will be given a fair and equitable chance to compete for appointments, promotion or transfer, and to pursue their career as actively as others. Employment decisions relating to appointment, promotion and career development will be determined according to individual merit and competence.

Consistent with this, CodeBinary does not condone any form of unlawful discrimination or vilification, including that which relates to:

- Gender;
- Pregnancy;
- Potential pregnancy;
- Marital/ domestic status;
- Disability;

- Race, colour, national extraction, social origin, descent, and ethnic, ethno-religious or national origin;
- Age;
- Family responsibilities, family status, status as a parent or career;
- Racial classification;
- Sexuality;
- HIV/AIDS vilification;
- Religious belief or activity;
- Political belief or activity;
- Industrial activity;
- Employer association activity;
- Trade union activity;
- Physical features;
- Breastfeeding;
- Trans-sexuality;
- Transgender;
- Profession, trade, occupation or calling;
- Medical records; and
- Criminal records.

In all the cases, no factor other than performance and competence are to be used as the basis for performance assessment, training and development opportunities and promotions

### **Equal Opportunity for Persons with Disability**

In accordance with the provisions of the Rights of Persons with Disabilities Act, 2016 and Rules, it is Company's Policy to ensure that the work environment is free from any discrimination against persons with disabilities. Further, the Company will take all actions to ensure that a conducive environment is provided to persons with disabilities to perform their role and excel in the same. The Company will build systems and processes to ensure:

1. That appropriate facilities and amenities are provided to persons with disabilities to enable them to effectively discharge their duties in the establishment.
2. That provision is made for an accessible environment and of availability of assistive devices as required.
3. That the HR Department will ensure a Liaison officer is designated to oversee the provision of required facilities/amenities including the process of recruitment for persons with disabilities. Such Liaison Officer shall be part of the Human Resources team reporting to the Executive Director Human Resources of the Company.
4. That a Grievance Redressal mechanism for addressing the matters related to the employment of persons with disabilities is available.
5. That the Business Integrity Committee will ensure if any grievance does arise and is brought up to the Committee concerning selection of person(s) with disability for any

position, training, promotion, transfer posting, leave & preference in accommodation allocation etc. is dealt with in a fair and equitable manner free from any discrimination.

6. That no opportunity is denied to persons with disabilities, merely on ground of disability.

Individuals with disabilities who apply or employees who believe themselves to be covered by the Rights of Persons with Disabilities Act, 2016, should contact the Human Resources Representative in any given location. 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 Act.

## **Policy Implementation**

1. Equal employment opportunity takes place in all employment practices: hiring, promotion, demotion, transfer, recruitment, termination, rates of pay or other forms of compensation, and selection for training. Every employee has access to Company-sponsored educational, training and recreational activities.
2. The Company endeavours to provide every employee with a working environment free from harassment. Individually and collectively, we share the responsibility for understanding the great importance of a respectful work environment, and for assuring that every employee is welcomed, accepted and rewarded according to his or her contribution to the attainment of our goals and objectives.
3. In addition, unlawful harassment, intimidation, threats, coercion, discrimination or retaliation in any other form against anyone is strictly prohibited for:
  - making a good faith internal complaint of any conduct, act or practice violating the Company's EEO Policy;
  - filing a complaint allowed by any equal employment opportunity law or regulation ("EEO laws");
  - participating in an investigation or any other activity undertaken by the Company or any governmental agency related to compliance with our EEO policy or any EEO law;
  - opposing in good faith any act or practice that violates any EEO law; or
  - exercising any right under any EEO law.
4. We know that positive, results-oriented action to advance equal employment opportunity serves the best interests of the Company, its employees and the communities in which it operates. Towards this end, the Director of Corporate Human Resources serves as CodeBinary's Equal Employment Opportunity Compliance Officer with overall responsibility for monitoring program effectiveness and assuring compliance with this policy. Managers at all levels are responsible for assuring full compliance with this policy in their respective areas. Each employee is responsible for supporting equal opportunity, assisting the Company in meeting its objectives in this

area, and assuring that their own conduct conforms to the Company's commitment to equal employment opportunity.

5. If an employee has any questions about the Company's policy on equal employment opportunity, the Company encourages the employee to talk to his or her Supervisor, Department Head, local Human Resources Representative, the Corporate Human Resources Department or the Law Division.

## **Procedure**

Employees who believe they are being treated unfairly as a result of discrimination should promptly notify their managers. Any supervisor or manager who receives such a complaint (whether formal or informal) must report the complaint to a local Human Resources Representative or the Corporate Human Resources Department.

Should a complaint of discrimination or harassment be made, it will be investigated in a confidential and procedurally fair manner. If proven, the person responsible will be disciplined. In serious cases, this may involve dismissal.

## **Review Timelines**

This policy will be reviewed on the basis of changes in the legal and market guidelines

## **Communication of Policy**

1. This Policy will be available to all employees via CodeBinary Intranet sites and normal communication vehicles within the business.
2. Suitable material will be included in Company publications, management conferences, and supervisory training courses.
3. All recruitment literature and employment advertising will indicate that the Company is an Equal Opportunity Employer.

## **For CodeBinary**



**Nilay Jayswal**

**Founder, CodeBinary Initiatives**