

Equal Opportunity Policy
Of
Valueattics Reinsurance Limited

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1. INTRODUCTION

At Valueattics Reinsurance Limited (“VRL”/“Company”), we recognise the value of a diverse workforce. We are committed to providing equal opportunities in employment and creating an inclusive workplace in which all employees are treated with respect and dignity. One of the primary objectives of this Policy is to ensure compliance with the provisions of The Rights of Persons with Disabilities Act, 2016 (“RPWD Act”).

1.1. SCOPE: The policy applies to all employees of Valueattics Reinsurance Limited.

1.2. OBJECTIVE: The objectives of this Equal Employment Opportunity (EEO) and Anti-Discrimination Policy are to ensure that all:

- Employees or potential employees do not suffer unfair discrimination in the workplace.
- Individuals and groups work in an environment where all decisions are free of discrimination, where they have an equal opportunity based on relevant abilities and merit.
- Application of labour laws to be uniformly applied in the organization.

2. POLICY ELEMENTS

2.1. DEFINITIONS AS PER THE RPWD ACT:

- “Person with a disability” 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.
- “Discrimination” concerning disability, means any distinction, exclusion, restriction based on 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.

2.2. SPECIAL FACILITIES EXTENDED:

- The Company has the capability to build the physical and technological infrastructure to adhere to the accessibility standards as prescribed by the Government of India. Any new facility that is built, renovated or rented will be evaluated for compliance with accessibility standards at different stages of the building construction.

2.3. EQUAL EMPLOYMENT OPPORTUNITY:

It refers to the principle which ensures that all employees and potential employees of VRL are treated equitably and fairly, regardless of their race, sex, sexual orientation, gender identity or disability. Everyone has an equal chance when applying for jobs or promotions, training opportunities and in their working conditions. The following activities shall be conducted uniformly:

- Recruitment procedure and selection criteria, for appointment or engagement of a person as an employee.
- Promotion and transfer of an employee.
- Training and staff development for an employee.
- Terms of employment or any other employee-related activity.

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2.4. ANTI-DISCRIMINATION POLICY:

Discrimination occurs when someone is treated unfavourably because of a certain attribute that involves some or all of the following:

- Conduct that can be considered harassing, coercive or disruptive, including sexual harassment.
- Making offensive 'jokes' about another worker's clan, ethnic background, colour, sex, disability, sexual orientation or gender identity
- Expressing negative stereotypes about particular groups e.g. "married women shouldn't be working."
- Judging someone on their political or religious beliefs rather than their work performance.
- Using selection processes based on irrelevant attributes or any other such attribute.

2.5. PARAMETERS OF DISCRIMINATION:

The following can be attributed as different parameters of discrimination:

- Age or other circumstances
- Colour
- Cultural or social beliefs
- Educational Background
- Race, ethnicity or nationality
- Physical features
- Gender
- Marital status
- Health or physical disability or impairment or any other such thing
- Sexual Orientation
- Gender Identity (One's innermost concept of self)

2.6. COMPLAINT PROCESS AND PROCEDURE:

2.6.1. How to make a complaint?

A person wishing to make a complaint of discrimination can consult and file a complaint with the EEO & Anti-Discrimination Committee. The complaint should be made in writing and addressed to the chairperson of the committee within 5 working days of any such incident of discrimination.

2.6.2. Equal Employment Opportunity and Anti-Discrimination Committee:

Name	Designation	Role
TA Ramalingam	Managing Director and Chief Executive Officer	Chairperson
Arnik Parmar	Chief Compliance Officer	Committee Member
Rohit Chitnis	Company Secretary	Committee Member

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2.6.3. Grievance Redressal Process:

- Investigation: Once a complaint has been filed an investigation will be undertaken immediately. In instances where there is an alleged respondent, the respondent will be notified immediately. The complainant and the respondent will both be interviewed along with any individuals who may be able to provide relevant information. Where the alleged discrimination is an organizational practice or procedure, that will be investigated and changed promptly.
- Timelines: The committee will investigate all complaints immediately and will work towards the prompt resolution and prevention of discriminatory acts and practices. The first round of investigation and conclusion shall be arrived at within 10 working days from the date of filing of the complaint.
- Confidentiality: VRL will preserve the confidentiality of all individuals involved in a discrimination complaint.
- Outcomes and Remedies: The committee may, before initiating an Inquiry and at the request of the complainant take steps to settle the matter between the Complainant and the Respondent through conciliation. No monetary settlement shall be made through conciliation.
 - (i) The complaint may be redirected to Human Resources for further appropriate action if it is found that the Complaint does not fall under the purview of sexual harassment.
 - (ii) During the Inquiry procedure, the complainant and the Respondent will be called separately to ensure freedom of expression and an atmosphere free of intimidation.
 - (iii) During the Inquiry procedure, the complainant can call a witness for the proceedings and he/she shall not be discriminated against on any grounds.
 - (iv) The committee would be entitled to elicit all forms of evidence and the concerned parties would cooperate. Failure or refusal of any person to cooperate or attempt to disturb or misguide the committee during its investigations may result in disciplinary action against such persons as deemed appropriate by the concerned authorities.
 - (v) The committee will maintain records of all the investigation proceedings and settlements. A copy of the settlement will be shared with the Complainant and Respondent.
- Appeal Process: Within 10 days from the result of the first round of investigation, either the complainant or the respondent may make a written request that an investigation is reviewed stating which aspect of the investigation is inadequate. The request must be submitted to the chairperson who will determine if the investigation is to be re-opened to address the concerns raised.

3. Review

The Head of HR and/or Managing Director and CEO of the Company is authorized to make changes in the foregoing policy as may be required from time to time. The Policy, along with changes, if any, shall be reviewed by the Board of Directors on annual basis.