

NALWA SONS INVESTMENTS LIMITED

CIN:L65993DL1970PLC146414

Corporate Office: Jindal Centre, 12, Bhikaiji Cama Place, New Delhi – 110066

Registered Office: 28, Najafgarh Road, Moti Nagar, Industrial Area, New Delhi-110015

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Website: www.nalwasons.com

EQUAL OPPORTUNITY POLICY

(Approved by the Board of Directors on May 30, 2023)

1. Objective

Nalwa Sons Investments Limited (hereinafter referred to as “NSIL” or the “Company”) respects dignity, privacy and personal rights of every employee and is committed to maintaining a workplace free from discrimination and harassment.

This policy aims to provide inclusiveness and equal employment opportunities for all employees without any bias towards gender, race, religion, caste, ethnic origin, nationality, age, or any other status protected by the laws or regulations in the locations where we operate.

2. Scope and Applicability

The Equal Opportunity Policy is applicable to all employees of the Company.

3. Key Roles and Responsibilities

Employees

- All employees of the Company shall abide by this policy and all applicable laws & regulations when acting as representatives of the Company.

Managers and Supervisors

- All managers and supervisors should take reasonable measures to address complaints that are brought to their attention and maintain confidentiality to the extent possible.

Human Resources Department

- Human Resources representatives should address grievances related to discrimination received from job applicant/employee.

4. Policy Guidelines

NSIL is committed to provide equal opportunities without any discrimination and to ensure that:

- All the employees of the Company shall treat each other with respect and dignity, which includes respecting the rights and differences of others.
- Candidate recruitment and selection will be based on merit and not on any other attributes or characteristics.
- All promotion and development opportunities are based on performance, ability, potential and business needs.

5. Equal Opportunity for Person with Disabilities

- The Company shall comply with all statutory requirements with reference to Rights of Persons with Disabilities Act, 2016.
- The Company shall identify posts that are suitable for Persons with Disabilities and ensure that there is no discrimination of any kind against disabled persons in all aspects of employment, including recruitment, training, working conditions, remuneration, transfers, employee benefits and career development.

- The Company will consider the specific needs of person with disabilities and will strive to provide appropriate facilities and amenities to enable them to perform their duties effectively.

6. Maintenance of Records

- All employees will be requested to fill the 'Voluntary Disability Self Identification Form' to give information regarding any disability they may have. An employee can edit the information at any time during the tenure. Employees are also requested to report disabilities acquired after joining the Company or in case of ceasing of a disability.
- The Company will collect and maintain data regarding employees with disabilities in relation to their employment as per The Rights of Persons with Disabilities Act, 2016.
- The Company respects the privacy of every individual and ensures utmost confidentiality of personal information shared with it by its employees (or potential candidates) in relation to disability / sexual orientation / gender identity or any other personal information. However, if the disclosure is mandated under law, then any such disclosure will be handled with utmost confidentiality and in accordance with the applicable laws.
- NSIL will take pre-consent from the employee for disclosing this information to the Managers/ Supervisors and other individuals involved in facilitating necessary support to the employee for smooth functioning.

7. Grievance Management

HR Head shall lead the implementation of the program and is responsible for planning, monitoring and reviewing its progress to ensure compliance with the policy. HR Head shall also act 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) at the workplace.

8. Violation and Reporting

NSIL has a zero tolerance for disrespectful or inappropriate behavior, unfair treatment, or retaliation of any kind. 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 investorcare@nalwasons.com

The Liaison Officer is responsible for resolving the grievance in a timely manner (within 90 days from the date of receipt of the grievance) to avoid further harm or inconvenience to the employee.

It is pertinent to note 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 as per the code of conduct.

9. Review Timelines

The policy will be reviewed based on changes in regulatory guidelines or any update in Company guidelines.