



Category	Inclusion and belonging
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Overview

We have a strong and shared commitment to workplace diversity and fostering a culture of inclusion. This commitment is deeply intertwined with the Piramal Values of Knowledge, Action, Care, and Impact, and our belief that our organization is strongest when we represent the diversity of the communities that we serve. We firmly believe that our ability to strengthen our culture, drive our business strategy and build long-term relationships with our clients, and customers depends on a truly diverse workforce and an inclusive, safe, and dignified work environment.

DIBA stands for Diversity, Inclusion, Belonging, and Accessibility.

1. **Diversity:** The recognition, acceptance, and celebration of the wide range of attributes, identities, characteristics, and experiences that individuals bring to the workplace. These attributes may include but are not limited to age, gender, race, ethnicity, religion, sexual orientation, gender identity, gender expressions, status as a protected veteran, status as an individual with a disability, socio-economic background, educational background, faith, caste, creed, nationality, color, place of birth, language, marital or family status, genetic information, medical condition or any other characteristic protected by law.
2. **Inclusion:** The intentional effort to create an equitable environment where all individuals feel welcomed, valued, and have a sense of belonging. Inclusion ensures that diverse perspectives are respected, heard, and considered in decision-making processes.
3. **Belonging:** The creation of an inclusive and supportive environment where individuals feel accepted, respected, and empowered to bring their whole selves to work, without fear of discrimination, harassment, or exclusion.
4. **Accessibility:** The design and implementation of equitable policies, practices, and physical or virtual spaces that enable equal access and participation for individuals with disabilities or diverse needs.

Purpose

Our organization is committed to fostering a diverse, inclusive, and accessible work environment where all individuals, regardless of their backgrounds or abilities, are valued, respected, and empowered to contribute their unique perspectives and talents. This policy outlines our commitment to diversity, inclusion, belonging, and accessibility (DIBA) to create a culture that celebrates diverse identities, differences, drives innovation, and enables the success of our organization.

1. **For the Organization:** Piramal is a leading diversified Non-Banking Financial Company (NBFC), with presence across retail lending, wholesale lending, and fund-based platforms. Our vision to provide expertise in both wholesale and retail funding opportunities for scalable and sustainable returns across sectors such as real estate and infrastructure, renewable energy, hospitality, logistics, industrials, and auto components and to be a significant provider of customized financing solutions is inspiring in its call to action on diversity and inclusion. We aim to be the preferred financial services partner for all its stakeholders. We believe that having a diverse employee base will enable us to bring our vision to life and ensure the creation of long-term tangible and intangible value for our stakeholders.

2. **For our People:** Our success is fuelled by our colleagues who constantly enable us to deliver on our purpose of “Doing Well and Doing Good”. Our people should feel that they operate in an environment that welcomes and celebrates differences and enables them to bring all of who they are to Piramal to do their best work. In line with this objective, we strive to adopt practices and processes that enable equitable, inclusive, safe, and dignified workplace experiences for all of our people and strengthen our culture of inclusion.
3. **For our Customers and Stakeholders:** We strive to understand our customers' and stakeholders' needs and build our capabilities so that we can effectively address them. To operate in a complex environment and continue to provide expertise in Financial Services domain, we must be equipped to deal with different age groups, gender, race, ethnicity, religion, sexual orientation, gender identity, gender expressions, status as a protected veteran, status as an individual with a disability, socio-economic background, educational background, faith, caste, creed, nationality, color, place of birth, language, marital or family status, genetic information, medical condition, diversity of thought, different cultures, identities, needs and lifestyles and embrace those differences with understanding and respect. We believe that the diversity of our workforce enhances our ability to understand the needs of our customers and stakeholders to create a sustainable impact on the communities in which we operate.

Scope of Application

This Policy is applicable to all the entities listed in Annexure 3. Accordingly for each entity, while reading the Policy, the term “Company” or “Piramal” used in the Policy shall refer to that entity.

DIBA Principles

1. **Respect and Dignity:** We promote a culture of mutual respect, dignity, equity, and fairness for all individuals, regardless of their diverse attributes or abilities.
2. **Equal Opportunity:** We provide equal opportunities for recruitment, hiring, training, promotion, compensation, and professional development, ensuring decisions are based solely on merit and qualifications.
3. **Non-Discrimination and Anti-Harassment:** We prohibit any form of discrimination, harassment, or retaliation.
4. **Inclusive Leadership:** We foster leadership practices that embrace diversity, champion inclusion, and promote a sense of belonging at all levels of the organization. ‘
5. **Accessibility and Accommodation:** We are committed to ensuring that our physical and virtual spaces, information, and technologies are accessible and accommodate the needs of individuals with disabilities or diverse abilities.
6. **Awareness and Education:** We provide ongoing awareness, education, and training on DIBA topics to foster understanding, empathy, and inclusive behaviors among all employees.
7. **Accountability:** We hold all employees accountable for upholding the principles of this policy and encourage reporting of any violations or concerns through established channels.
8. **Continuous Improvement:** We regularly assess and improve our DIBA practices, policies, and initiatives to drive progress and create a more inclusive and accessible workplace.

Ensuring that our organization embraces diversity and inclusion is the responsibility of every employee across the organization. By creating and sharing DIBA Guidelines set forth below, we enable our employees to perform and foster a culture that is fundamental to our continued success.

Our DIBA Guidelines

One of the most effective ways for us to address the needs of our diverse customers and stakeholders is to have a workforce that reflects and appreciates the diversity of the world around us.

This is how we describe our DIBA guidelines:

1. **Attract and hire a diverse talent pool:** We proactively seek to attract a diverse pool of candidates by implementing inclusive recruitment and selection processes that promote equitable opportunities. We aim to strengthen our hiring processes and drive technology-aided recruitment by utilizing diverse interview teams. We strive to ensure that we equip our talent acquisition team and hiring managers to conduct broad searches for diverse candidates and maintain multiple platforms to reach out to suitable candidates from diverse backgrounds.
 - 1.1. We aim to adopt job descriptions that are relevant and inclusive in terms of content, language, and images in our job postings.
 - 1.2. We endeavor to focus more on short-list and select candidates based only on their qualifications, skills, and experience for the applied job.
 - 1.3. We endeavor to ask fair and competency-based questions that are relevant to the role to increase the quality of the hiring process.
 - 1.4. We endeavour to interview a diverse pool of candidates suitable for the role.

2. **Engage and retain a diverse workforce:** We know that through a culture of inclusion, we can encourage a team of people from diverse backgrounds to share their ideas and perspectives. We strive to promote diversity through a wide range of personal and professional development programs that are open to all of our employees and invest in robust employee communication and listening frameworks. Our existing and new leadership imperatives reinforce inclusive behaviors as essential elements in managerial and leadership skills throughout our organization. In so doing, we strive to ensure that each employee in our organization, no matter their background, has the equal opportunity to succeed.
 - 2.1. **Career opportunities:**
 - 2.1.1. We strive to implement processes to ensure that internal promotions and career development opportunities are based on performance, skills, and potential.
 - 2.2. **Learning and development:**
 - 2.2.1. We endeavour to provide access to training opportunities to all employees basis their individual development needs.
 - 2.2.2. We endeavour to provide better access to relevant and comprehensive e-learning resources that assist in understanding different age groups, gender, race, ethnicity, religion, sexual orientation, gender identity, gender expressions, status as a

protected veteran, status as an individual with a disability, socio-economic background, educational background, faith, caste, creed, nationality, color, place of birth, language, marital or family status, genetic information, medical condition, diversity of thought, and cultural sensitivities for the geographical areas in which we operate and build on their foundational understanding of unconscious biases to become more inclusive in their actions.

2.3. Rewards and recognition:

- 2.3.1. We strive to have clear and robust reward and compensation frameworks that ensure employees are paid equally for same and substantially similar job profiles. We endeavor to monitor our internal pay data to ensure the above principle is reflected in our compensation programs, policies, and practices.
- 2.3.2. We recommend a balanced goal-setting approach with clearly defined and measurable outcomes. We aim to link merit increments and performance pay with individual and business performance where individual performance is measured based on achievement of predetermined goals and objectives and display of Piramal Success Factors. We strive to conduct performance reviews in a fair and unbiased manner.
- 2.3.3. We make consistent efforts to equip our managers to recognize performance and provide evidence-based feedback for the growth and development of their team members.

- 3. **Comply with applicable local legislation:** We continue to comply with applicable laws wherever we operate.
- 4. **Inclusive Policies and Practices:** We review and revise our policies, practices, and procedures to eliminate barriers, biases, and inequities, ensuring they align with our commitment to DIBA.
- 5. **Accessibility and Accommodation:** We strive to make our physical and virtual workplaces accessible to all individuals, making reasonable accommodations for individuals with disabilities or diverse needs.
- 6. **Employee Resource Groups:** We support and encourage the formation of voluntary employee resource groups that provide a supportive network, promote inclusion, and raise awareness of diverse perspectives and abilities.
- 7. **Metrics and Reporting:** We establish metrics and regularly measure our progress towards DIBA goals, ensuring transparency.

Equal employment opportunity

We provide equal employment opportunities to all employees and applicants for employment. We do not discriminate based upon age, gender, race, ethnicity, religion, sexual orientation, gender identity, gender expressions, status as a protected veteran, status as an individual with a disability, socio-economic background, educational background, faith, caste, creed, nationality, color, place of birth, language, marital or family status, genetic information, medical condition, or any other characteristic protected by law.

We base our employment decisions on merit considering qualifications, skills, performance, and achievements. We endeavor to ensure that all applicants and employees receive equal opportunity in personnel matters, including recruitment, selection, training, placement, promotion, demotion, compensation and benefits, transfers, terminations, and working conditions, including reasonable accommodation for qualified individuals with disabilities as well as individuals with needs related to their religious observance or practice.

**Refer Annexure 1 for sub-policy within equal employment opportunity under Rights of Persons with Disabilities Act, 2016*

**Refer Annexure 2 for sub-policy within equal employment opportunity under the Transgender Persons (Protection of Rights) Act 2019*

Employee responsibilities

Piramal expects all employees to take responsibility for:

1. Embracing the DIBA Guidelines in all their actions.
2. Treating everyone with respect and dignity while valuing differences and unique perspectives.
3. Engaging in consciously inclusive interactions to enable an environment that is free from discrimination, harassment and bullying and one that facilitates the seamless implementation of the DIBA Guidelines.
4. Enhancing their awareness of non-inclusive behaviors and potential unconscious bias and understanding how these behaviors might hamper our ability to collaborate and create a safe workplace.
5. Employees have responsibility to actively participate in all the DIBA related events, learning and professional development programs.

Manager responsibilities

Piramal expects all managers to take responsibility for:

1. Fairly implementing the DIBA Guidelines as part of their day-to-day responsibilities
2. Creating an equitable, inclusive, and safe work environment that
 - 2.1. Enables the organization to sustain focus on the DIBA guidelines.
 - 2.2. Is free from harassment and discrimination.
 - 2.3. Reinforces Piramal Values.

- 2.4. Fosters a culture of integrity, dignity and respect for each individual.
- 2.5. Encourages employees to collaborate and embrace diverse opinions.
- 2.6. Empowers employees to correct observed non-inclusive behaviors by team members.
3. Engaging in ongoing dialogue to discuss how each team member is contributing to an inclusive work environment.
4. Proactively working towards mitigating unconscious biases in hiring, performance management, talent management and succession planning.
5. Displaying behaviors in line with our Values and Piramal Success Factors
6. Promoting inclusive leadership, thoughtful decision making, creating and taking accountability, and be willing to continuously learn and embrace change.

Prohibiting Discrimination, Harassment and Bullying

Piramal is committed to a workplace that is free from employee harassment, discrimination, and bullying. We expressly prohibit any form of employee harassment or discrimination based on age, gender, race, ethnicity, religion, sexual orientation, gender identity, gender expressions, status as a protected veteran, status as an individual with a disability, socio-economic background, educational background, faith, caste, creed, nationality, color, place of birth, language, marital or family status, genetic information, medical condition or any other characteristic protected by law.

The guidelines forbid behaviors, encompassing verbal, physical, or visual actions, which encompass any form of discriminatory employment measures and any unwelcome behavior directed at an individual due to their protected status.

Reporting Inappropriate Conduct

Each member of Piramal management is responsible for creating an atmosphere free of discrimination and harassment, sexual or otherwise. Further, employees are accountable for respecting the rights of their co-workers.

If any employee experiences or observes any job-related discrimination or harassment based on age, gender, race, ethnicity, religion, sexual orientation, gender identity, gender expressions, status as a protected veteran, status as an individual with a disability, socio-economic background, educational background, faith, caste, creed, nationality, color, place of birth, language, marital or family status, genetic information, medical condition or any other characteristic protected by law or believe they have been treated in an unlawful, discriminatory manner, promptly report the incident to the manager, department or division head, or Human Resources representative. Please refer to table 1 on page 10 of this policy for details of concerned reporting authorities.

These Guidelines apply to all incidents of alleged discrimination or harassment occurring in during employment or engagement with Piramal, including those occurring off- premises or off-hours, where the alleged offender is an employee (direct or indirect employee, manager, co-worker, third party vendor, contractor etc.)

In any case of harassment or discrimination by a third party over which Piramal has no control, the company will make reasonable efforts to help the person take it up with the company where the person is employed or any other reasonable forum as applicable.

We take allegations of discrimination, harassment, and bullying seriously and ensure they are properly investigated. All reported incidents will be investigated with an effort to keep the source of the report confidential, with the disclosure of information as appropriate to facilitate the investigation or the resolution of the matter. All employees must report any conduct they believe violates these Guidelines. Additionally, every employee must cooperate with any investigation conducted by Piramal, regardless of whether the investigation is being conducted by Piramal officials or outside parties retained by Piramal for this purpose, or, for that matter, by an outside agency.

Piramal prohibits retaliation against any employee for raising a concern in good faith. Presenting a concern in good faith means that an employee has made a genuine attempt to provide accurate and

truthful information even if it is later proven to be mistaken. Retaliation against an employee because of a report under these Guidelines or because an employee has participated in an investigation under these Guidelines is strictly prohibited and will not be tolerated. However, if, after investigating any complaint of harassment or discrimination, we determine that the complaint is frivolous and was not made in good-faith, or that an employee has provided false information regarding the complaint, disciplinary action may be taken against the individual who filed the complaint or who gave the incorrect information.

In any case of discrimination, harassment or bullying, the company will take reasonable endeavours to ensure individual's personal information is protected and confidential unless such disclosure is required by law or policy.

For detailed information on appropriate conduct, please refer to the Piramal Code of Conduct at Policy and for guidelines on anti-harassment, consult the POSH Policy available in the HRMS portal under the HR Policy section.

Table 1:

Concerns related to	Reported to
Any violation or offence under this policy*	POSH <ul style="list-style-type: none"> • Internal Committee members or • Posh@piramal.com or • Human Resources representative (BHR or HR Head)
	Discrimination or bullying or harassment, other violations <ul style="list-style-type: none"> • Human Resources representative (BHR or HR Head) or • DIBA team (diversity.inclusion@piramal.com) • Employees' manager or • Department or division head
Any violation or offence under subpolicy 1 & subpolicy 2	<ul style="list-style-type: none"> • Grievance Redressal Committee** • Human Resources representative (BHR or HR Head) or • DIBA team (diversity.inclusion@piramal.com) • Employees' manager or • Department or division head

*Should any individual filing a complaint perceive conflict of interest involving the individual associated with the resolution process, in such cases, they may reach out to Senior management in confidence providing clear explanations for their concerns.

****Grievance Redressal Committee:**

Name	Role in committee	Email ID
Nikhil Prabhu	Liaison Officer	nikhil.prabhu@piramal.com
Pramod Gite	Member	pramod.gite@piramal.com
Parneet Soni	Member	parneet.soni@piramal.com
Aditya Adyar	Member	aditya.adyar@piramal.com
Akshata Shetty	Member	akshata.adukia@piramal.com

Consequences

Employees who do not comply with these Guidelines and/ or are found to have engaged in discrimination, harassment or bullying will be subject to appropriate disciplinary action, up to and including termination of employment.

Review and Amendments

This policy and its sub policies (as stated in Annexure 1 &2 of this policy) will be periodically reviewed to ensure its effectiveness and alignment with the evolving needs of our employees, business, compliance requirements or any eventual laws and amendments. Any necessary amendments will be made in consultation with relevant stakeholders.

Annexure 1- Equal Opportunity Policy under Rights of Persons with Disabilities Act, 2016

Piramal is committed to providing equal opportunities to all its Workforce Members (*defined below*) and specifically wishes to underscore its commitment to the objectives and spirit of the Rights of Persons with Disabilities Act, 2016 and the Rights of Persons with Disabilities Rules, 2017 (“**RPWD Law**”). Piramal casts special attention to the persons with disabilities to provide equal opportunities in all aspects of employment / engagement, including recruitment, training, promotion, and other employment / engagement-related practices.

To enable this, Piramal has accordingly formulated this Equal Opportunity Policy for Persons with Disability (“**Policy**”). As per the provisions of this Policy, Piramal will identify, from time to time, suitable roles for Persons with Disabilities (*defined below*). In the event such individuals are hired, Piramal will also provide them with the requisite support, such that they can discharge their duties effectively and have equal opportunities for success at the organization as any other Workforce Member.

Since a Workforce Member with a disability may have specific concerns and have additional requirements, they are requested to contact the Human Resources Department from time to time, so as to enable Piramal to make suitable arrangements.

Purpose

This Policy is to provide equal opportunities to the Persons with Disabilities (PWDs) Workforce Members of Piramal without any discrimination, on the grounds of age, gender, race, ethnicity, religion, sexual orientation, gender identity, gender expressions, status as a protected veteran, socio-economic background, educational background, faith, caste, creed, nationality, color, place of birth, language, marital or family status, genetic information, medical condition or any other characteristic protected by law.

Definition

For the purpose of this Policy:

- (a) **Barrier** means any factor including communicational, cultural, economic, environmental, institutional, political, social, attitudinal, or structural factors which hamper the full and effective participation of PWDs in society.
- (b) **Discrimination** means any distinction, exclusion, restriction on the basis of a person’s disability whose purpose or effect is to impair or nullify the recognition, enjoyment, or exercise on an equal basis with others, 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. Provided that a particular action or omission shall not be considered discrimination if it is a proportionate means of achieving a legitimate aim.

- (c) **Workforce Member(s)** means all individuals who are working for Piramal (including the entities specified under **Annexure 3**), including all permanent and temporary employees, employees under a fixed term contract and probationers.
- (d) **Person with Disability / PWD** means a person with long term physical, mental, intellectual, or sensory impairment which, in interaction with Barriers, hinders their full and effective participation in society equally with others.
- (e) **Reasonable Accommodation** means necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden on Piramal in a particular case, to ensure to PWDs, the enjoyment or exercise of rights equally with others.

Scope

This Policy applies to all Workforce Members of Piramal who can be classified as Persons with Disability. To further clarify, this Policy shall cover: (a) persons who apply for any posts, and (b) Workforce Members who acquire any disability during the course of their employment / engagement with Piramal. Nikhil Prabhu, Chief Talent Officer who has been appointed as the Liaison Officer, will be in charge of the implementation of this Policy.

At Piramal, we ensure fair recruitment processes, and all our job postings are open to everyone without discrimination, including persons with disabilities (PWDs) unless the nature of the job is such that the disability doesn't allow the person to complete the particular tasks in the JD.

If a Workforce Member acquires a disability during their employment / engagement tenure, Piramal shall undertake best efforts to ensure that such Workforce Member is not terminated from their services purely on account of having acquired a disability in the course of employment / engagement.

Further, Piramal shall ensure that: (a) its facilities, technologies, privileges, and benefits are made accessible to all Workforce Members who are PWDs; (b) Workforce Members who are PWDs do not suffer any form of bullying or harassment while being employed / engaged at Piramal; and (c) Reasonable Accommodation is provided to all Workforce Members who are PWDs. At all times, PWDs are encouraged to speak to the Human Resource Department/Liaison Officer in case they have any concerns.

Manner of Selection

- a. **Advertisement of vacancies:** Efforts shall be made to widely advertise vacancies within Piramal, including notifying disability organizations wherever possible. Vacancy shall endeavor to include appropriate references to equal employment. Application forms will be made available in alternate formats, based on request.
- b. **Selection Process:** The Selection Process for Piramal is framed in a manner to enable equal employment opportunity and to ensure that regular programs are initiated from time to time

for HR and Talent Acquisition Team to address an unconscious bias and promote equal opportunity and diversity. The selection process for PWDs will be as per point 1 of our DIBA guidelines in this document. Requests for Reasonable Accommodation/ travel requirements for PWDs may be made to the Talent Acquisition Team for the relevant position.

Rights and Entitlements:

- a. Performance Evaluation:** For evaluation of the performance of Workforce Members who are PWDs, Piramal will prescribe objective evaluation criteria, taking into account any Reasonable Accommodation provided.
- b. Disability Leave:** Workforce Members may discuss with HR on flexibility to work and special leave as required up to a maximum of 5 such special leaves which will be reviewed on case to case basis. Any such request by the Workforce Members will be treated as a request for Reasonable Accommodation.
- c. Reasonable Accommodations:** We recognize that Workforce Members who are PWDs may require reasonable accommodations to perform their job duties effectively. Piramal will make reasonable efforts to provide such accommodations, ensuring equal access to employment or engagement opportunities. Workforce Members are encouraged to approach Human Resources to discuss their specific accommodation needs confidentially. Piramal will ensure that Workforce Members who are PWDs are able to perform the essential functions of the job and enjoy the same benefits and privileges of employment / engagement as non-disabled Workforce Members.

Examples of Reasonable Accommodation may include (*but not be limited to*) acquiring or modifying certain equipment or devices, modifying assessment, and training materials, modifying work schedules, reassignment to a vacant position, disability-related leave, relaxed working hours, work-from home options, etc. Further, in the course of undertaking their duties, PWDs may approach the Human Resource Department with a request for Reasonable Accommodation, which shall be considered on a case-to-case basis. At no point in time will Piramal require any Workforce Member who is a PWD to bear (directly / indirectly) any costs pertaining to the Reasonable Accommodation provided. All documents concerning a Workforce Member's Reasonable Accommodation request would be strictly confidential.

- d. Accessibility:** Piramal is committed to providing an accessible and inclusive workplace. We strive to remove physical and digital barriers to ensure that individuals with disabilities can participate fully in all aspects of work and communication.
 - **Employee Resource Group for PWD:** Piramal aims to empower the employees for fostering inclusion and providing a platform for raising awareness and having discourse on the issues pertaining to PWD.
 - **Physical Infrastructure:** Piramal shall continuously strive to ensure that all physical infrastructure (including buildings, furniture, facilities, transportation, and services relating

to the workplace) adheres to the accessibility standards as prescribed by the Government of India.

- **Digital Infrastructure:** Piramal shall continuously strive to ensure that its documents, communications, and information technology systems adhere to the prescribed accessibility standards.

e. Training and Awareness: Piramal shall organize various in-house programmes such as orientation, refresher course and other programmes as may be deemed appropriate and suitable for Workforce Members who are PWDs.

We will conduct regular training sessions for our employees, managers, and stakeholders to raise awareness about disability rights, inclusivity, and the importance of equal opportunity. These efforts will promote a better understanding of how to support and collaborate with colleagues who have disabilities. Wherever such training is required, Piramal shall ensure that it is in an accessible format. If any Workforce Member who is a PWD requires any specific assistance, they are requested to approach the Liaison Officer/the Human Resource Department.

f. Workforce Member Engagement and Social Inclusion: Piramal is conscious that in the course of employment / engagement, Workforce Members who are PWDs may face issues regarding integration at the workplace. Towards this, Piramal shall take various initiatives from time to time, which shall be further outlined by the Liaison Officer/the Human Resource Department. Specifically, Piramal shall: (a) undertake sensitization training for its Workforce Members on the rights of PWDs; and (b) endeavour to ensure that PWDs participate in all company-sponsored events and that such events are conducted at accessible venues.

g. Assistive Devices: Piramal shall provide PWDs with assistive devices as and when required.

Grievance Redressal Committee

Piramal has appointed a Grievance Redressal Committee. The details of the Grievance Redressal Committee are provided on page 11 of this policy document.

Grievance Redressal & Harassment Prevention

If any Workforce Member believes they have experienced Discrimination or witnessed discriminatory practices against PWDs (*including denial of any Reasonable Accommodation without any justification*), they are encouraged to report the incident to the Grievance redressal committee or Human Resources or any other appropriate authority within the organization. The complaint will be treated confidentially, and prompt action will be taken to address and resolve the issue. However, allegations made in bad faith and without any factual substance may also result in appropriate disciplinary action, pursuant to appropriate investigation by designated authority.

A PWD may also approach the Chief Commissioners, or the State Commissioners appointed under the RPWD Law with their complaints, who are required to dispose of such complaint within a period of 60 days (*30 days in exceptional circumstances*).

Affirmative Action

As part of our commitment to creating a diverse workforce, Piramal will adopt affirmative action measures to ensure increased representation and opportunities for persons with disabilities. These measures will be implemented in accordance with applicable laws and regulations.

Compliance

We pledge to comply with all relevant provisions of the RPWD Law and any other applicable laws and regulations related to equal opportunities for persons with disabilities.

By adhering to this Policy, Piramal affirms its commitment to foster an inclusive and diverse workplace, where Workforce Members can thrive and contribute to the organization's success, regardless of their disability status.

Piramal shall collect and maintain data regarding Workforce Members who are PWDs, in the manner specified under the RPWD Law. Any and all information shared by a Workforce Member regarding their disability will be kept strictly confidential. However, the following disclosures will be considered exceptions in this regard: (a) disclosures to managers/supervisors of PWDs, in connection with providing any Reasonable Accommodation; (b) disclosures to security personnel to facilitate any necessary support during an emergency; and (c) disclosures to Government officials in connection with any investigation into the compliances under the RPWD Law.

Modification of this Policy

Piramal reserves the right to modify this Policy as and when required *inter alia* to ensure compliance with applicable laws. Workforce Members have the responsibility to always keep themselves familiarized with the latest version of this Policy.

Annexure 2- Equal Opportunity Policy under the Transgender Persons (Protection of Rights) Act, 2019

Piramal wishes to underscore its commitment to maintaining a diverse and inclusive environment which provides equal opportunities for all qualified persons. As such, Piramal in accordance with the provisions of the Transgender Persons (Protection of Rights) Act, 2019 (“**Transgender Act**”) has formulated this Equal Opportunity Policy for Transgender Persons (“**Policy**”) that endeavours to provide a safe working environment while ensuring that no transgender person is discriminated against in any manner relating to employment / engagement. Piramal shall also provide Transgender Persons (*defined below*) with the requisite support such that they are on an equal footing with any other workforce member in Piramal.

This Policy seeks to ensure the participation, contribution, progress and success of all Transgender Workforce (*defined below*) by fostering an environment where they feel included, are afforded equal rights, and are treated fairly and respectfully at Piramal.

Purpose

Piramal does not discriminate in any way on the basis of sex, sexual orientation, gender identity, or gender expression. This Policy has been designed to create a safe and productive workplace environment for all workforce members. This Policy sets forth guidelines to address the needs of Transgender Workforce and clarifies how the law should be implemented in situations where questions may arise about how to protect the legal rights or safety of such Transgender Workforce. This Policy does not anticipate every situation that might occur with respect to Transgender Workforce, and the needs of each Transgender Workforce must be assessed on a case-by-case basis. In all cases, the goal is to ensure the safety, comfort, and healthy development of Transgender Workforce while maximizing the workforce member’s workplace integration and minimizing stigmatization of them.

Definition

“**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.

Scope

This Policy applies to employees (*defined as all employees who are working for Piramal, which includes all permanent and temporary employees, employees under a fixed term contract and probationers*), who identify as a Transgender Person (“**Transgender Workforce**”). Although there is absolutely no compulsion to do so, we encourage Transgender Workforce covered by this Policy to come forward and identify themselves to Chief Talent Officer, Piramal Enterprises Limited so that Piramal may make appropriate arrangements for them. Please note that this Policy is

applicable to Piramal, which includes all entities related to Financial Services businesses. Please refer to Annexure 3 for the complete list of entities.

Infrastructural Facilities

a. Restroom Facilities

Piramal will ensure that Transgender Workforce have access to the restroom corresponding to their gender identity, that is, transgender women shall have access to the women's restroom and transgender men shall have access to the men's restroom. The Transgender Workforce shall have the sole decision to determine the choice of restroom according to the most appropriate and safe option for them.

Additionally, Piramal shall continue to endeavor to make provisions, if required, for gender-neutral or unisex restrooms for Transgender Workforce. Any Transgender Workforce who has a need or desire for increased privacy, regardless of the underlying reason, will have access to such unisex restrooms, when available.

Other Aspects

a. Privacy

Transgender Workforce shall have the right to discuss their gender identity or expression openly, or to keep that information private. Piramal shall keep information about a workforce member's transgender status confidential. Such confidential information may be shared only with the voluntary consent of the Transgender Workforce.

b. Names / Pronouns

Transgender Workforce shall be addressed by the name and pronoun that correspond to their gender identity. Such information may be communicated by them to the Human Resources Department. A court-ordered name or gender change is not required.

If a workforce member is unsure of the pronoun preferred by a Transgender Workforce, they shall politely ask their co-worker as to how they would like to be addressed. The intentional or persistent refusal to respect a workforce member's gender identity shall constitute harassment and is in violation of this Policy, attracting serious consequences including disciplinary action as per applicable policy of Piramal.

c. Dress Code

Transgender Workforce and gender non-conforming workforce members shall have the right to comply with Piramal dress codes in a manner consistent with their gender identity or gender expression.

d. Transitioning on the Job

Workforce members who transition in the course of their employment / engagement by way of medical intervention, i.e., any gender affirming medical intervention undertaken by an individual to facilitate the transition to their self-identified gender, including but not limited to counselling, hormonal therapy, and surgical intervention, if any, shall receive the cooperation of Piramal.

The Human Resources Department shall work with each transitioning workforce member individually to ensure a successful workplace transition, such as adjusting personnel and administrative records and even developing an individualized communication plan to share the news with co-workers and clients if so desired by the Transgender Workforce.

For assistance in relation to transitioning on the job, the Transgender Workforce shall reach out to the Chief Talent Officer from the Human Resources Department.

e. Prohibition against discrimination / harassment:

Piramal prohibits discrimination against a Transgender Workforce on any of the following grounds, namely:—

- a) the denial, or discontinuation of, or unfair treatment in services thereof;
- b) the unfair treatment in, or in relation to, employment or occupation;
- c) the denial of, or termination from, employment or occupation;
- d) the denial or discontinuation of, or unfair treatment in, healthcare services;
- e) the denial or discontinuation of, or unfair treatment with regard to, access to, or provision or enjoyment or use of any goods, accommodation, service, facility, benefit, privilege or opportunity dedicated to the use of the general public or customarily available to the public;
- f) the denial or discontinuation of, or unfair treatment with regard to the right of movement;
- g) the denial or discontinuation of, or unfair treatment in, the opportunity to stand for or hold public or private office; and
- h) the denial of access to, removal from, or unfair treatment in, the establishment in whose care or custody a transgender person may be.

Piramal shall not discriminate against any Transgender Workforce in any matter relating to employment / engagement including, but not limited to, recruitment, promotion and other related issues. Transgender Workforce shall be subject to the same rules and regulations governing service conditions as any other workforce member. Any incident of discrimination, harassment, or violence based on transgender status, gender identity, or expression, will be given immediate and effective attention, including but not limited to investigating the incident, taking suitable corrective action, and providing Transgender Workforce with appropriate resources. If any Transgender Workforce's safety is threatened, they may communicate the same to any member of the Grievance Redressal Committee who will accordingly arrange for security and safe transportation.

Grievance Redressal Committee

Piramal has appointed a Grievance Redressal Committee. The details of the Grievance Redressal Committee are given on page 11 of this policy document.

Grievance Redressal & Harassment Prevention

If a workforce member believes they have experienced discrimination or witnessed discriminatory practices against Transgender Workforce, they are encouraged to report the incident to the Grievance redressal committee or Human Resources or any other appropriate authority within the organization. The complaint will be treated confidentially, and prompt action will be taken to address and resolve the issue.

Affirmative Action

As part of our commitment to creating a diverse workforce, Piramal will adopt affirmative action measures to ensure increased representation and opportunities for Transgender Workforce. These measures will be implemented in accordance with applicable laws and regulations.

Compliance

We pledge to comply with all relevant provisions as may be applicable, under the Transgender Act, and any other applicable laws and regulations related to equal opportunities for Transgender Persons as may be notified from time to time.

By adhering to this Policy, Piramal affirms its commitment to foster an inclusive and diverse workplace, where all workforce members can thrive and contribute to the organization's success, regardless of their sex, gender, gender identity or gender expression.

Modification of this Policy

Piramal reserves the right to modify this Policy as and when necessary *inter alia* to ensure compliance with applicable laws. Workforce members have the responsibility to always keep themselves familiarized with the latest version of this Policy.

Annexure 3- Entities covered under this policy

Piramal Enterprises Limited
Piramal Corporate Services Private Limited
Piramal Trusteeship Services Private Limited
Piramal Capital & Housing Finance Limited
Piramal Fund Management Private Limited
Piramal Alternatives Private Limited
India Resurgence Asset Management Business Private Limited
India Resurgence ARC Private Limited
Piramal Agastya
Piramal Consumer Products Private Limited