

SNF (India) Private Limited

HR Policy

Policy on Diversity, Equity and Inclusion

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1. Objective

SNF (India) Private Limited ("**SNF India**" or "**Company**") strongly believes that business should be conducted in a socially responsible manner and promises to maintain diversity and inclusion in the workplace. This policy should be read and interpreted in conjunction with SNF India's Code of Conduct.

2. Our definition of diversity and inclusion

Workplace diversity refers to the variety of differences among people in an organization. An organization is a collective representation of people coming with individual differences in thoughts, personalities, unique capabilities, and talents that they bring to work. It is an understanding that each individual is unique, and a recognition of our individual differences, so that each and everyone feels important, respected, included, and engaged as we assimilate people with differences, including but not limited to nationality, geography, ethnicity, gender, sexual orientation, age, physical abilities, family status, religious beliefs, perspective, experience or other ideologies.

While we strongly appreciate diversity in all forms, achieving gender parity is a priority for us. Besides, our workforce should reflect the diverse consumers and communities we serve. As a global company, we work in countries with a broad array of laws and regulations. But regardless of where we operate, we take care to respect the diversity, talents and abilities of all. We benefit greatly from the skills, experience and commitment of the diverse range of people who work with us. Diversity is a business imperative, as much as it is about fairness and societal equity across diverse groups, globally. Companies with a healthy diversity mix are more likely to have financial returns above their industry median. Additionally, research shows that the most engaged employees are those working in an open, fair and diverse environment.

3. Applicability

This policy applies to all SNF India Employees, including any person employed at SNF India for any work on a regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name (collectively referred to as "**Employees**"). This policy also applies to third parties such as Customers, Vendors, Suppliers, Contractors Subcontractors, and any additional individual or entity that has a contractual agreement with the Company (collectively referred to as "**Third Parties**").

4. Policy

- 4.1. **Commitment to Diversity:** SNF India is committed to fostering, cultivating, and preserving a culture of diversity and inclusion. We believe it is the responsibility of all SNF India Employees to contribute to the creation and sustainment of an open, diverse, and inclusive workplace.
- 4.2. Our human capital is the most asset we have. The collective sum of the individual differences, work and life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our Employees invest in their work represents a significant part of, not only our culture but our reputation and the company's achievement as well.
- 4.3. **Equal Opportunity:** In order to provide equal employment and advancement opportunities to all individuals, employment decisions at SNF India will be based on merit, qualifications, and performance. The Company does not discriminate in employment opportunities or practices on the basis of race, ethnicity, nationality, gender, age, education, socioeconomic background, family status, marital status, religious and political beliefs, sexual orientation, physical and mental disability or any other characteristics ("Protected Characteristics").
- 4.4. SNF India's diversity initiatives are applicable but not limited—to our practices and policies on recruitment and selection, compensation and benefits, professional development and promotions, transfers, social and recreational programs, and terminations.

5. Prohibition of Harassment

- 5.1. The Company prohibits harassment relating to Protected Characteristics and conduct, and retaliation against any individual who has made a good faith report of an actual or perceived violation.
- 5.2. The Company prohibits Employees from improperly interfering with another Employee's capacity to carry out the duties, responsibilities and obligations expected from and/or assigned to them. Any such conduct will not be tolerated by SNF India, and strict disciplinary or other legal action will be taken in case of such behaviour, including (without limit) leading up to immediate termination of the engagement.
- 5.3. Any form of retaliation against an individual who has reported any type of harassment or who is cooperating with an inquiry into a complaint is illegal and will not be condoned. All reasonable measures will be taken by SNF India to stop and prevent unlawful harassment.

- 5.4. Retaliation means any adverse action taken or threatened against an individual as a consequence of reporting a breach of this policy or objecting to any act or practices it forbids, or taking part in the reporting or investigation procedure and includes (without limit):
- 5.4.1. ostracizing and avoiding an individual who reports or raises harassment, discrimination, or retaliation;
 - 5.4.2. threats or intimidation, whether explicit or tacit, used to discourage someone from filing a report about harassment, discrimination, or retribution;
 - 5.4.3. denying benefits to an individual because they took part in the reporting and investigation process or because they complained about harassment, discrimination, or retaliation; or
 - 5.4.4. dismissal, lowering of rank, denial of due promotion, unwarranted negative feedback, increased surveillance, harassment, and physical aggression.
- 5.5. Harassment means any conduct that has the intent or effect of making a workplace intimidating, hostile, or offensive; that substantially and unreasonably interferes with an individual's ability to perform their work responsibilities; or that otherwise has a negative impact on an individual's engagement opportunities due to the individual's membership in a protected class or segment of people. It includes but is not limited to epithets, slurs, jokes, pranks, innuendo, comments, written or graphic material, stereotyping, or other threatening, hostile, or intimidating acts based on race, caste, colour, ancestry, national origin, gender, sex, sexual orientation, marital status, religion, age, disability, or another characteristic protected by any applicable law.

6. Roles and Responsibilities

6.1. Employee

- 6.1.1. Compliance with this policy.
- 6.1.2. Respectful communication and cooperation between all Employees.
- 6.1.3. Teamwork and Employee participation, permit the representation of all groups and Employee perspectives.
- 6.1.4. Contributions to the communities to promote a greater understanding and respect for diversity.
- 6.1.5. All Employees of SNF India have a responsibility to treat others with dignity and respect at all times.
- 6.1.6. Verbal Communication in a group should be in a common language and should be accepted by all.

- 6.1.7. All Employees are expected to exhibit professional conduct that reflects inclusion during work, at work functions on or off the workplace, and at all other company-sponsored and participative events.
- 6.1.8. Any Employee found to have exhibited any inappropriate conduct or behaviour against others will be subject to disciplinary action.
- 6.1.9. Create an open working environment where diversity is welcome and a desired part of our workplace.
- 6.1.10. Any Employee who believes they have been subjected to any kind of discrimination, harassment, or retaliation that conflicts with the Company's diversity policy and initiatives should seek assistance from their immediate supervisor or HR Personnel or should submit a complaint in a prescribed form as **Annexure - 1**.

6.2. **Immediate Supervisor / In charge / Head of the Department:**

- 6.2.1. Compliance with all Roles and Responsibilities of an Employee as above.
- 6.2.2. Ensure that the current policy is applied and followed.
- 6.2.3. Include Human Resources personnel in any investigation or breaches of this policy.
- 6.2.4. Provide Employees with a safe work environment free from discrimination, harassment, retaliation, and inappropriate conduct or behaviour.
- 6.2.5. Give Employees with diverse talents the opportunity to showcase their skills in a manner that is likely to benefit the Company and its mission.
- 6.2.6. Assist Employees who make good faith reports of violations of or conduct inconsistent with this policy.
- 6.2.7. Resolve conflicts that arise between co-employees as a result of discrimination and seek Human Resources assistance.
- 6.2.8. Take prompt and appropriate action to enforce this policy, including towards those violating the policy.
- 6.2.9. Protect against retaliation relating to good faith reports, and complaints.

6.3. **Human Resources and Management:**

- 6.3.1. Compliance with all Roles and Responsibilities of an Employee and Immediate Supervisor / In charge / Head of the Department as above.
- 6.3.2. Ensure that the current policy is applied and followed.
- 6.3.3. Promote and foster diversity.
- 6.3.4. Lead the development of and awareness of workplace diversity and inclusion among Employees and management.

- 6.3.5. Assist management and Employees in the enforcement of this policy and the resolution of conflicts arising from actual or potential violations of this policy.
- 6.3.6. Maintain book-keeping of the complaints arising under this policy and maintain to comply with the same.
- 6.3.7. Assisting the management to protect this policy and make sure to take disciplinary actions against this policy.

7. Non-compliance and consequences

- 7.1. It is against the Company's policy for any Employee or Third Party to harass, intentionally or unintentionally, any Employee or Third Party engaged by the Company based on their actual or perceived Protected Characteristics Any such conduct is strictly prohibited, will not be tolerated by the Company, and strict disciplinary or other legal action will be taken in case of such behaviour, including (without limit) leading up to immediate termination of employment.
- 7.2. Employees are encouraged to and must file a complaint if they feel they have experienced or witnessed unlawful discrimination, harassment or any other inappropriate behaviour. Complaints must be filed directly with the **HR Team** or your immediate supervisor or department manager, and any other person with whom they feel comfortable doing so. The Complaint and Redressal Form attached as Annexure 1 may be used to raise a complaint under this policy.
- 7.3. The Company shall use the most appropriate method (in the Company's sole discretion) to investigate such complaints, which may also involve third persons, advisors or consultants who may conduct the investigations for and on behalf of the Company. The employee or other person making the complaint must (and remains duty bound to) fully cooperate with, provide assistance to, and supply all relevant information and details (in a timely manner during the period of employment and even thereafter) to the Company and its agents as required to conduct the investigation and inquiry into the complaint. The Company and its agents will maintain anonymity of the complainant, the complaint, the investigation, and the inquiry to the fullest extent possible.
- 7.4. Subject always to Section 8, if the Company's investigation and inquiry finds violations of this Policy in this Section 7, the Company will take all appropriate disciplinary action, which may include (without limit) fines, reprimands or immediate dismissal or immediate termination of any form of engagement with SNF India from service for Misconduct without notice.

8. Other Policies for Prevention of Sexual Harassment

8.1. The Company operates the following policies separately, which are made available to and must be reviewed by all the Employees: -

8.1.1. Policy for Prohibition and Prevention of Sexual Harassment at Workplace in terms of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“**PoSH Policy**”);

This policy is Alignment with United Nation's Sustainable Development goals pertaining to diversity and inclusion.



KUMARESAN RAJENDRAN
Chairman And Managing Director

Above policy approved by CMD to be circulated to all SNF India Pvt Ltd employees.

Annexure – 1

Complaint and Redressal Form under Diversity, Equity and Inclusion Policy

Name of the Employee/ Contract employee/ Trainee		Contact Number	
Emp. ID.		E-mail ID.	
Designation		Department	

Description of Grievance:

Signature of the Employee

Date :

Description of Grievance and corrective action:

Signature of the Employee

Date :

Signature of the HOD - HR

Date :