



PRAYAAN CAPITAL

EQUAL OPPORTUNITY POLICY

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I. **OBJECTIVE**

1. This Equal Opportunity Policy (the “**Policy**”) is formulated in accordance with the provisions of The Rights of People with Disabilities Act, 2016 and the rules formulated thereunder (the “**Act**”).
2. At Prayaan Capital Private Limited (the “**Company**”), we recognize the value of a diverse workforce. We are committed to providing equal opportunities in employment and creating an inclusive workplace and work culture in which all Employees (*as defined herein after*) are treated with respect and dignity.
3. It is the policy of the Company to provide equal employment opportunities and the Company is committed to eliminating all forms of unlawful Discrimination (*as defined herein after*) (which includes direct Discrimination, indirect Discrimination and denial of reasonable accommodation), bullying and harassment of Employees with disabilities.
4. At the Company, we continuously strive to ensure that all our facilities, technologies, information and privileges are accessible to Employees with disabilities.
5. We encourage candidates with different disabilities to apply. Our decisions on employment, career progression, training or any other benefits are solely based on merit and we do not discriminate basis any disability. We follow an inclusive evaluation process by ensuring that an Employee with disability is provided with any suitable flexibility and accommodation that may be required so that she/he may be evaluated fairly.

II. **APPLICABILITY**

6. This Policy applies to the Company and all its Employees and operations, subject to applicable regulations, qualifications and merits of an individual.
7. This Policy is applicable to an Employee, throughout the period of employment of the individual, right from the recruitment process till superannuation, retirement, death, resignation or retirement, as the case may be.

III. **DEFINITIONS**

- i. “**Board**” means the board of directors of the Company, as constituted from time to time.
- ii. “**Certificate of disability**” means the certificate of disability issued to a person with disability under the Act.

- iii. **“Discrimination”** in relation to disability, means any distinction, exclusion, restriction on the basis of 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;
- iv. **“Employee(s)”** means the employees on the payroll of the Company.
- v. **“Employee with disability”** means an Employee with long term physical, mental, intellectual or sensory impairment as certified in a Certificate of disability, which, in interaction with barriers, hinders his full and effective participation in society equally with others.
- vi. **“Liaison Officer”** means the liaison officer required to be appointed by the Company under the Act.

IV. **IDENTIFIED POSITIONS FOR PERSONS WITH DISABILITY**

All positions at the Company are open for people with all types of disabilities. The hiring and promotion of Employees is purely based on merit and the candidates will be evaluated based upon their skills and competence. Flexibility and accommodations will be provided to Employees with disabilities on an individual basis as detailed in this Policy.

V. **FACILITIES AND AMENITIES**

1. **Physical Infrastructure**

The Company aims to ensure that its physical infrastructure adheres to the accessibility standards as prescribed by the Government of India under the Act.

Any new facility that is built or renovated or leased or rented by the Company will be evaluated for compliance with accessibility standards as prescribed under the Act.

2. **Digital Infrastructure**

It is the Company's continuous endeavor to ensure that all its documents, communication and information technology systems adhere to the accessibility standards. Any Employee facing accessibility challenges can reach out to the local IT support team or write to Liaison Officer.

3. **Reasonable Accommodation**

The Company will make reasonable accommodations, whenever necessary, for qualified Employees or job applicants who have disabilities, as per the Act. Such accommodation would be provided: (i) to ensure equal opportunity in the application and selection process, (ii) to enable an Employee with a disability to perform the essential functions of a job; and (iii) to enable an Employee with a disability to enjoy the same benefits and privileges of employment as non-disabled Employees. Examples of reasonable accommodations may include acquiring or modifying equipment or devices, modifying assessment and training materials, modifying work schedules, reassignment to a vacant position.

All documents concerning an Employee's reasonable accommodations request would be maintained in the Employee's confidential file, separate from the Employee's official personnel file.

VI. OTHER FACILITIES

1. Training and Career Development

The Company will endeavour to provide course materials including requisite assistive devices to ensure barrier-free accessibility, meant for induction and training in accessible formats on a written request made by any Employee with disability.

The request for reasonable accommodation, if any, such as assistive aids, accessible training venue, accessible materials, interpreter, scribe, etc. should be placed at least 1 (one) week prior to the scheduled date of commencement of such induction/training.

2. Disability Leave

An Employee's request for extra leave, for a reason related to her/his disability, will be treated as a request for reasonable accommodation and will be evaluated accordingly.

The Company provides an option of unpaid special leave for a maximum period of 10 Working Days for Employees with disabilities who plan to undergo medical treatment. The procedure for availing such leave is detailed out in the Company's Leave Policy.

3. Travel, stay and transport

For official travel, Employees with disabilities will be provided accessible modes of transport such as air travel (in case road/train travel is inaccessible), and accessible guest houses and hotels and such other facilities which such Employee may reasonably require and request.

4. Employee engagement and social inclusion

The Company will endeavor to make all Company events and meetings inclusive by ensuring that these are conducted at accessible venues with a provision of reasonable accommodation being available to Employees with disabilities.

VII. MAINTENANCE OF RECORDS

1. The Company will collect and maintain data regarding Employees with disabilities in relation to their employment, facilities provided and other necessary information as required under the Act and as required by it for the purposes of discharging its obligations under the Act, including:
 - i. The number of Employees with disabilities employed with the Company and the date from when they are employed;
 - ii. The name, gender and address of such Employees with disabilities;
 - iii. The nature of disability of such persons;
 - iv. The nature of work being rendered by such Employee with disability; and
 - v. The kind of facilities being provided to such Employees with disabilities.
2. All Employees will be asked to fill a “Voluntary Disability Self Identification Form” in order to give information regarding any disability that she/he may have. An Employee may edit the information at any time during her/his tenure. An Employee who subsequently incurs any disability can also edit and update the form.
3. The information that an Employee shares about their disability will be kept confidential, except as may be required by the managers, supervisors, security personnel or other employees and third parties engaged by the Company, to enable the Company to discharge its obligations under the Act and this Policy, or as may be required to be disclosed by the Company under applicable laws.

VIII. GOVERNANCE FRAMEWORK

1. The Board shall be responsible for implementing this Policy. This Policy may not be modified without the prior written approval of the Board.
2. The Board shall appoint a Liaison Officer to look after the recruitment of Employees with disabilities, provision of facilities and amenities for such Employees and discharge such other functions as the Board may delegate in relation to this Policy.

IX. GRIEVANCE REDRESSAL

1. Any violation of this Policy, including when any Employee with disability is Discriminated against or not provided reasonable accommodation or denied access to any Company facility, will be regarded as a grievance.

2. Any Employee with disability with a grievance may make a complaint in writing to the Liaison Officer and the Liaison Officer shall promptly inform the Board of such complaint. The Board will take appropriate steps to address such grievance, including ordering investigation into such grievance.
3. On investigation, if any person employed with the Company is found guilty of Discriminatory behaviour, the Board may take such disciplinary actions against such person as it deems fit.
4. Employees with disability also have the right to file a complaint concerning any Discrimination with the Grievance Officer.