

ANTI HARASSMENT & ANTI DISCRIMINATION POLICY
OF
EDGRO FINANCE PRIVATE LIMITED

Approved by Head Human Resources
Edgro Finance Private Limited

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Director

Document History:

Version	Approved on	Comments/ Changes	Remarks/ Changes	Prepared By	Approved By
01	April 1, 2021	Anti-Harassment & Anti-Discrimination Policy		Human Resources	Head HR
02	April 1, 2024	Anti-Harassment & Anti-Discrimination Policy		Human Resources	Head HR
03	Apr 01, 2025	Amended for a. A reference to the Equal Opportunity Policy b. Relevant compliance details under the Rights of Persons with Disabilities Rules, 2017		Human Resources	Head HR

1. Purpose and Scope:

Bluebear Technology Private Limited (“**the Company**”) is committed to fostering a professional, inclusive, and respectful work environment that promotes equal opportunity and strictly prohibits all forms of discrimination, harassment, and retaliation.

This Policy is intended to:

- Ensure that all employees interact professionally and contribute to a workplace rooted in respect, fairness, and dignity.
- Prevent harassment, discrimination, and retaliation in all forms—verbal, physical, environmental, or systemic.
- Establish clear procedures for reporting and resolving concerns in a timely and effective manner.
- Ensure that all employment decisions are made based on legitimate business criteria and individual merit, including qualifications, skills, and experience.
- Extend equal opportunity protections across all terms and conditions of employment, including recruitment, compensation, promotion, benefits, training, and disciplinary actions.

Specifically, this Policy also seeks to ensure that Persons with Disabilities (**PWDs**) enjoy their right to equality and live with dignity and respect, on an equal basis with others. The Policy aims to empower employees with disabilities, enhance their participation within the organization, and support their inclusion through:

- Provision of appropriate workplace amenities and reasonable accommodations.
- Availability of assistive devices where required.
- Definition of roles and responsibilities applicable to PWDs.
- Establishment of a structured Grievance Redressal Mechanism to address any disability-related concerns or challenges.

All employees, including managerial and non-managerial personnel, are responsible for promoting this Policy, preventing inappropriate conduct, and maintaining an environment where concerns can be raised without fear of retaliation.

This Policy applies to conduct at all Company offices and worksites, as well as during work-related events or activities conducted outside the workplace, including off-site meetings, business trips, and Company-sponsored functions.

The Company is fully compliant with the Rights of Persons with Disabilities Act, 2016, the Rights of Persons with Disabilities Rules, 2017, and the Rights of Persons with Disabilities (Amendment) Rules, 2024, notified by the Ministry of Social Justice and Empowerment on October 18, 2024, and effective October 22, 2024.

2. Definitions:

For the Purpose of This Policy,

- **Person with Disability (PWD):** An individual with a long-term physical, mental, intellectual, or sensory impairment which, in interaction with various barriers, hinders their full and effective participation in society on an equal basis with others.
- **Discrimination (in relation to Disability):** Any distinction, exclusion, or restriction based on disability that has 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 political, economic, social, cultural, civil, or any other sphere. This includes denial of reasonable accommodation.

- **Employee:**

An “Employee” shall have the meaning as defined under the Company’s Whistleblower Policy, and includes all full-time, part-time, contractual, temporary, or intern personnel engaged by the Company.

3. Policy Statements:

3.1. Equal Opportunity: The Company is committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment on race, ethnicity, religion, gender, age, national origin, color, ancestry, age, HIV positive Status, mental or physical disability, medical condition, pregnancy, military or veteran status, genetic information, citizenship status, marital status, sexual orientation, gender identity and/or gender expression.

3.2. Prohibited Harassment: Harassment is any unwelcome conduct (verbal, nonverbal or physical) that has the purpose or effect of violating a person’s dignity, modesty, creating a hostile or offensive environment, or can reasonably be expected to cause an individual to feel uncomfortable, intimidated, threatened, bullied, humiliated, offended, denigrated or distressed. Also prohibited are unwelcome sexual advances, requests for sexual favors and other verbal or nonverbal behavior or physical contact of a sexual nature (regardless of how the overture is communicated). It is important to understand that:

- Inappropriate conduct may involve individuals of the same or opposite sex and is prohibited regardless of sex, gender identity or whether the individual submits to it or rejects it.
- Harassment and/or inappropriate conduct are often defined by the impact to the recipient rather than by the intent of the person causing the offense. Inappropriate behavior will not, therefore, be excused or justified by claiming that it was unintentional or humorous or because it occurred under the influence of alcohol or other substances.

3.3. Reporting: All managers of the Company are responsible for abiding by the terms set forth in this Policy, establishing equal opportunity as an integral part of their personnel decisions, encouraging employees to bring their concerns forward and preventing harassment, discrimination in the workplace. Employees who are aware of possible violations of this policy must immediately contact Sonia Naik, Nodal Officer of the Company to adhere the compliances mentioned under the Policy and adherence to the compliance provisions of the Company.

3.4. Prohibition Against Retaliation: Every employee is encouraged to come forward without fear of reprisal, as this Policy of the Company prohibits any and all forms of retaliation against anyone who makes a good faith complaint pursuant to this Policy, or who otherwise participates in a Company or agency investigation into such complaints, even if sufficient evidence is not found to substantiate the complaint. If you believe that you have been or may be subjected to retaliation for making or cooperating in the investigation of a complaint under this Policy, please promptly notify your manager or next-level manager or Human Resources. Concerns of retaliation will be investigated and addressed in the same manner as allegations of discrimination and harassment.

3.5. Investigation Procedures and Disciplinary Measures: After the Company receives a complaint alleging a violation of the Company’s Equal Opportunity Policy, the Company will conduct a prompt, thorough, impartial investigation and take corrective action as appropriate based upon information obtained during its investigation. Employee complaints and investigations will be kept confidential to the extent possible. At the conclusion of the investigation, the Company will promptly initiate any appropriate responsive action. Responsive action may include, for example, training, referral to counseling, monitoring of the offender and/or disciplinary action such as a warning, reprimand, withholding of a promotion or pay increase, reduction of wages, demotion, reassignment, temporary suspension without pay or termination, as the Company believes appropriate under the circumstances.

- 3.6. Miscellaneous:** Training Frequent training and awareness programs for employees are designed to promote a workplace free of discrimination and harassment.

4. Compliance with Transgender & HIV Laws:

3.1. In compliance with Rules 7(3), 8(1) of the Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Rules, 2018 and the applicable provisions of the Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Act, 2017 (referred to as "HIV Laws") and in compliance to Rule 12 (2), (3), (4) of Transgender persons (Protections of Rights) Rules 2020 and Transgender persons (Protections of Rights) Act, 2019, our Company is firmly committed to fostering an inclusive and equitable workplace. This commitment ensures that all employees have equal opportunities and are protected from discrimination, particularly regarding HIV/AIDS and Transgender status. Our company has adopted a comprehensive non-discrimination policy that explicitly prohibits any form of discrimination against individuals based on their HIV/AIDS & Transgender status. This policy is prominently displayed across all our office locations to ensure that every employee is aware of our commitment to preventing discrimination and supporting individuals with HIV/AIDS & Transgender status.

3.2. To address any concerns or complaints related to HIV/AIDS & Transgender discrimination, we have established a clear redressal mechanism:

- **Reporting Mechanism:** Employees who believe they have experienced or witnessed discrimination related to HIV/AIDS & Transgender status are encouraged to report their concerns promptly. Complaints can be directed to our designated Nodal Officer, Sonia Naik. She can be reached via email at hr@edgrofin.com
- **Complaint Handling:** Sonia Naik, Nodal Officer of the Company is responsible for managing and addressing all queries and complaints related to HIV/AIDS & Transgender status discrimination. She will ensure that each complaint is taken seriously, investigated thoroughly, and resolved in a fair and timely manner.
- **Transparency and Accountability:** In accordance with Rules 12(2), 13(2), and 13(3) of the HIV Laws, we are committed to maintaining transparency regarding the handling of complaints. Details of any complaints related to HIV/AIDS, including the nature of the complaint, its number, and the actions taken, will be published annually in our company report and, if applicable, on our company website. This practice reflects our dedication to creating a respectful and supportive work environment.

Our policy and procedures are designed to uphold the principles of respect, fairness, and inclusivity, ensuring that all employees feel safe and supported in their workplace. If you have any questions or need further information about our policy or redressal process, please do not hesitate to contact Sonia Naik.

5. Compliance with Rights of Persons with Disabilities Act, 2016:

5.1. **Maintenance of Records:** In compliance with Section 21 of The Rights of Persons with Disabilities Act, 2016 and the corresponding rules, The Company shall ensure the proper maintenance of records in respect of employees with disabilities, covering the nature of disability, type of work assigned, and facilities or accommodations provided. These records shall be maintained in a secure and confidential manner by the Human Resources Department and made available for inspection by appropriate authorities as and when required under applicable law.

At the Time of Hiring:

- All candidates offered employment with the Company shall be required to disclose, at their sole discretion, any existing disability in accordance with applicable law and Company policy.

- Where a candidate voluntarily declares a disability and seeks protection or support under this Policy and the Act, they shall be required to submit a valid Disability Certificate issued by a competent Government authority in the prescribed format under the Act.
- Human Resources Department shall ensure that all candidate application forms and recruitment systems include appropriate fields for the voluntary disclosure of disability status, in compliance with data protection and privacy regulations.

For Existing Employees:

- Any existing employee who seeks to avail of the rights, entitlements, or protections available under the Act may voluntarily declare their disability by notifying their respective Human Resources representative.
- The declaration of disability by an employee shall be entirely voluntary and no employee shall be compelled to disclose such information. All such disclosures shall be treated with the strictest confidentiality and in compliance with the Company's data protection and privacy policies.
- Upon receipt of such disclosure and the accompanying Disability Certificate, the Human Resource Department shall update internal records and initiate appropriate measures to provide reasonable accommodations, accessible infrastructure, or any other necessary support to enable the employee to perform their duties effectively and without discrimination.

5.2. Grievance Redressal Mechanism: In accordance with the provisions of The Rights of Persons with Disabilities Act, 2016, and to ensure fair and effective resolution of grievances raised by employees with disabilities, the Company shall maintain a formal grievance redressal mechanism as part of this Policy.

- Sonia Naik, **Nodal Officer** of the Company shall act as the designated Liaison Officer under this Policy and shall be responsible for addressing all complaints, grievances, and welfare-related concerns raised by employees with disabilities. Such complaints can be raised under process defined the Whistle Blower Policy approved by the Board.
- The Liaison Officer shall:
 - ✓ Serve as the primary point of contact for employees with disabilities seeking redressal of workplace-related issues, including but not limited to discrimination, lack of reasonable accommodation, inaccessible infrastructure, or harassment;
 - ✓ Ensure that all complaints are received, documented, and addressed in a timely, sensitive, and confidential manner;
 - ✓ Coordinate with relevant internal stakeholders (such as Compliance, Legal, or department heads) to investigate the complaint and facilitate appropriate remedial action;
 - ✓ Ensure that no employee is subjected to retaliation, discrimination, or victimization for raising a grievance under this Policy.
- A formal Grievance Redressal Register shall be maintained by the Human Resources Department to record the nature of the complaint, status of resolution, and timelines followed.
- Employees may raise grievances either verbally or in writing. Where required, assistance shall be provided to PWDs in submitting their complaints, including alternative modes of communication.
- All grievances shall be resolved promptly and ideally within 30 days from the date of receipt, subject to the complexity of the issue.

6. Communication of the Policy

- This Policy shall be made publicly accessible to all employees via the Company's internal communication platforms, including the Website and HRMS Portal.
- b) The Company shall undertake reasonable efforts to ensure that this Policy is communicated in an accessible format, including alternate formats for employees with visual or auditory impairments, as required.
- Orientation and awareness sessions regarding this Policy may be organized periodically to sensitize employees and reinforce a culture of inclusion and accessibility.

7. Review and Amendment of the Policy

- The content, applicability, and effectiveness of this Policy shall be reviewed periodically and approved by the Head of Human Resources or such other authorized officer as may be designated by the Company.
- The review shall take into account changes in applicable laws, best industry practices, feedback from stakeholders, and evolving organizational needs.
- Human Resources Department reserves the right to amend, modify, or rescind any part of this Policy at its sole discretion, with or without prior notice, subject to compliance with applicable legal requirements.

****** End of the Policy******