

<b>Document Title</b>	Equal Employment Policy
<b>Version Number</b>	V.01
<b>Date of Issue</b>	4 <sup>th</sup> August 2025
<b>Effective From</b>	4 <sup>th</sup> August 2025
<b>Owner / Author</b>	Human Resources Department
<b>Approver</b>	Mr.Rohan Mukesh Gala – Director & CEO
<b>Review Cycle</b>	Annually or whenever there is a change in the statute
<b>Last Reviewed On</b>	Not applicable
<b>Next Review Due</b>	4 <sup>th</sup> August 2025
<b>Status</b>	Final
<b>Confidentiality</b>	Internal
<b>Distribution List</b>	All Employees
<b>Change History</b>	Not applicable

## 1. Purpose

**Sanlayan Technologies Private Limited ("Sanlayan")** has a strong Equal Employment Policy and a commitment to affirmative action. We hire based on one's experience and qualifications, and we promote based on performance. In instances in which an employee needs to be dismissed, Sanlayan will terminate only based on performance, and the decision will in no way be related to age, gender identity or expression, religion, caste, sex, race, color, creed, national origin, or disability. Questions or complaints related to discrimination on any of the above-mentioned factors should be immediately directed to the People Services team. This policy is in accordance with the Transgender Persons (Protection of Rights) Act, 2019, & the Rules, 2020, and the Rights of Persons with Disabilities Act, 2016.

## 2. Scope

This policy applies to all employees, applicants for employment, and interns at all locations of Sanlayan, including remote and on-site work environments.

## 3. Policy Statement

Sanlayan is an equal opportunity employer. We prohibit all forms of discrimination, harassment, disability or unfair treatment based on gender identity, including but not limited to discrimination against transgender persons & disabled persons in:

- Recruitment and hiring
- Compensation and benefits
- Training and development
- Promotion and career progression
- Transfer and termination
- Access to facilities and workspaces

All employment decisions shall be made on the basis of merit, qualifications, and business need.

As per the Transgender Persons (Protection of Rights) Act, 2019: Transgender person means a person whose gender does not match the gender assigned at birth and includes trans-man or trans-woman, person with intersex variations, genderqueer, and persons having socio-cultural identities such as kinner, hijra, aravani, and jogta.

## 4. Rights of Transgender Persons

In compliance with the Act and Rules:

- Transgender persons shall not be discriminated against in any employment-related matters.
- Individuals shall be addressed and treated as per their self-identified gender.
- The organization will recognize and respect the right of employees to express their gender identity.
- Gender-neutral restrooms and changing facilities shall be made available, wherever possible.
- Equal access to health benefits shall be ensured without discrimination.
- Measures will be put in place for safety and security (including but not limited to transportation and guards), and amenities (such as hygiene products) that will be provided to transgender persons so as to enable them to effectively discharge their duties in the establishment

Any personal or sensitive information regarding an individual's gender identity or transition shall be handled with utmost confidentiality and shared only on a need-to-know basis, with the consent of the individual. Sanlayan will ensure that transgender employees will have access to the full range of support services, appropriate to their needs, which are available to their non-transgender colleagues.

## 5. Rights of Disabled Persons

Discrimination on the basis of disability refers to imposing any distinction, exclusion, or restriction of persons on the basis of disability which has the purpose or effect of impairing or nullifying the recognition or exercise, on an equal basis, of employment in relation to other employees of Sanlayan. Sanlayan is committed to creating an environment in which the disclosure of disability would be safe. Disclosure of disability is necessary where an employee requests support. Disclosure will be made to the People Services Team. The team will also handle the recruitment of persons with disabilities and other matters under this policy.

Disclosed information will be treated as private and confidential. It will be used in relation to the concerned employee's employment with Sanlayan as required under the Rights of Persons with Disabilities Act, 2016.

Sanlayan will ensure that employees with disabilities will have access to the full range of support services, appropriate to their needs, which are available to their non-disabled colleagues. Sanlayan has provided the following facilities and amenities to employees with disabilities:

- Provisions for assistive devices (including ramps, handrails, balustrades, stair markers, and signage) at all entry and exit points of Sanlayan premises and all other locations within Sanlayan premises, which an employee may need to access during the course of work.
- Barrier-free accessibility at all entry and exit points of Sanlayan premises and all other locations within Sanlayan premises, which an employee may need to access during the course of work.
- Designated restrooms with suitably equipped WCs and sinks
- Proper and effective lighting in and outside Sanlayan's premises
- Have an emergency evacuation procedure for persons with disabilities.

Sanlayan will, as required under applicable law, facilitate requests for accommodations that will facilitate an employee's equal participation in employment with Sanlayan. The People Services team will play a facilitative role in this matter. Sanlayan will also identify suitable positions for persons with disabilities and has internal guidelines on the manner of selection for these positions. Support and assistance will also be provided to all employees in relation to training for their specific position in line with business practice. Where it is necessary, a new employee who has a disability can reach out to the People Services team to identify areas of the job profile that may pose challenges and determine a manner to address these. This may entail the purchase of technology or equipment, adjustments to the physical workspace, etc.

## 6. Grievance Redressal Mechanism / Liason Officer

As required under the Rights of Persons with Disabilities Act, 2016, and Transgender Persons (Protection of Rights) Act, 2019, Sanlayan ensures equal employment opportunities to individuals with disabilities as defined under the said law and transgender persons. Details of the facilities and amenities provided by Sanlayan to persons with disabilities (including provisions for assistive devices and barrier-free accessibility) and transgender persons so that they can effectively perform their work for Sanlayan are listed in Annexure I of this handbook. Annexure I also contains details of the posts identified for such persons and the manner of selection for these posts, with details regarding training, preference in transfer, promotion, accommodation allotment, leave, and any other facilities provided by Sanlayan. Sanlayan has appointed a liaison / complaint officer to handle the recruitment of persons with disabilities and transgender persons, along with the provisions and amenities for such employees. The liaison officer will also handle grievances related to transgender rights in the workplace, provide a safe & confidential process for raising concerns or complaints, and take timely & appropriate action against any individual found to be in violation of this policy.

Particulars	Details of the Liaison / Complaint Officer
Employee ID	S0001
Employee Name	Rohan Gala
Designation	Director and Chief Executive Officer
E-Mail ID	rohan@sanlayan.com
Contact Number	9833964208

## **7. Sensitization and Awareness**

The organization shall:

- Conduct regular training programs and awareness sessions on gender diversity and inclusivity.
- Ensure that all employees are sensitized to the rights and dignity of transgender persons and disabled persons.

## **8. Policy Review**

This policy will be reviewed periodically to ensure continued alignment with applicable laws and best practices in diversity and inclusion.