

## TATA DIGITAL GROUP

### EQUAL EMPLOYMENT OPPORTUNITY POLICY

#### ***Equal opportunity employer***

1. *We provide equal opportunities to all our employees and to all eligible applicants for employment in our company. We do not unfairly discriminate on any ground, including race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability or any other category protected by applicable law.*
2. *When recruiting, developing and promoting our employees, our decisions will be based solely on performance, merit, competence and potential.*
3. *We shall have fair, transparent and clear employee policies which promote diversity and equality, in accordance with applicable law and other provisions of this Code. These policies shall provide for clear terms of employment, training, development and performance management.*

#### ***Dignity and respect***

4. *Our leaders shall be responsible for creating a conducive work environment built on tolerance, understanding, mutual cooperation and respect for individual privacy.*
5. *Everyone in our work environment must be treated with dignity and respect. We do not tolerate any form of harassment, whether sexual, physical, verbal or psychological.*
6. *We have clear and fair disciplinary procedures, which necessarily include an employee's right to be heard.*
7. *We respect our employees' right to privacy. We have no concern with their conduct outside our work environment, unless such conduct impairs their work performance, creates conflicts of interest or adversely affects our reputation or business interests."*

#### **Section D, Clause 1-7 of The Tata Code of Conduct**

## **1. Policy Statement**

Tata Digital Private Limited (including its subsidiaries, the “**Company**” or “**we**” or “**our**”) is committed to providing equal opportunities in employment and creating an inclusive working environment.

It is our policy that there should be no discrimination, harassment or less favorable treatment of any employee or job applicant, either directly or indirectly, on the grounds of age, color, physical ability, ethnic origin, nationality, religion, gender, family status, marital status, prenatal status, gender re-assignment, or sexual orientation.

It is our policy that there shall be no bullying or intimidation for any reason towards any employee or applicant.

## **2. Objective**

The objectives of this Equal Employment Opportunity Policy (“**Policy**”) are to:

- a. provide equal and fair opportunities for employment to all qualified applicants;
- b. maintain a work environment free from harassment based on age, colour, physical ability, marital status, parental status, ethnic origin, religion, sexual orientation, or gender identity;
- c. make employment relationship decisions solely on the basis of individual ability and qualifications, subject only to occupational requirements, seniority and retirement policies and other appropriate non-discriminatory criteria;
- d. adhere to applicable law pertaining to equal employment opportunities and fair employment practices; and
- e. to inform all staff of certain behaviour that will be deemed unacceptable, and measures that the Company may take, should there be any derogation from these norms.

### **3. Scope and Applicability**

This Policy is applicable to all individuals working at all levels and grades, including directors, senior executives, senior managers, officers, employees (whether permanent, fixed term or temporary), consultants, contractors, trainees, interns, seconded staff, casual workers and agency staff, agents, business partners, service providers, professional associates, and such other relevant persons, including those acting on behalf of the Company (all of the aforesaid being collectively referred to as “**Employees**”).

In jurisdictions outside India, local law shall take precedence over this Policy in the event of any conflict with this Policy.

This Policy applies to all practices, terms and conditions of employment, including but not limited to: recruitment and hiring; position upgrade; promotion; transfer; on-the-job training programs; other training opportunities; wage and salary administration; Employee benefits; maternity benefits; layoff or termination; and application of service, seniority, and retirement policies for all Employees.

### **4. Non-Discrimination**

- a. The Company shall not discriminate directly or indirectly against any Employee or job applicant on any grounds including on the grounds of religion, race, caste, colour, gender, sex, sexual orientation, place of birth, ancestry, ethnic origin, marital status age, disability, or pregnancy or maternity status.
- b. Decisions of recruitment and promotion of Employees shall be made objectively and based on performance, merit, competence and potential.
- c. No recruitment or promotion shall be denied to a person on any of the above grounds. The Company shall not deny promotion to any Employee on the grounds of pregnancy or maternity or any of the grounds described above.
- d. No Employee shall face any reduction in rank if the Employee acquires a disability during service. The Company shall endeavor to reskill the Employee for another position at the same designation or higher if the Employee is unable to perform the duties of the current position due to the disability.
- e. Notwithstanding any of the provisions of this Policy, no affirmative action policies or positive action measures taken by the Company to improve diversity in our workforce when recruiting and promoting candidates at all levels shall be construed as discriminatory.

### **5. Bullying and Intimidation**

The Company shall promote a harmonious working environment in which our Employees will be treated with dignity and respect. We have a zero-tolerance policy towards bullying and harassment.

Bullying is offensive, intimidating, malicious, threatening or insulting behaviour, or an abuse or misuse of power which is meant to undermine, humiliate or injure the person at the receiving end.

Harassment is any unwanted conduct which has either the purpose of, or could reasonably be considered to, have the effect of, violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person, even if that effect was not intended by the person responsible for the conduct.

Behaviour which may be considered to be "common-place", which was intended as a joke, or was not intended to be offensive, may still amount to harassment or bullying. Harassment may be deliberate or unconscious, open or covert, an isolated incident or a series of repeated actions.

## **6. Commitment to Diversity and Inclusion**

The Company is committed to strengthening diversity and inclusion at the workplace through an enabling environment, supportive work-life policies for Employees and a culture that welcomes differences and creates a sense of belonging. We strive to create a work environment where all Employees can develop and grow to achieve their full potential. We are an equal opportunity employer and are committed to maintaining respect and dignity for all.

## **7. Implementation**

All Company locations are required to create and maintain a climate that will permit the continuing and consistent application of this Policy among all categories of Employees.

## **8. Responsibility**

The Human Resources Department shall have the functional responsibility of assuring compliance with this Company Policy; developing, coordinating and implementing all programs; and reporting findings and progress.

If it is believed that anybody is being harassed or discriminated against contrary to this Policy, anybody can invoke the Company's grievance procedure. Every complaint will be investigated and dealt with sympathetically, without bias, and as quickly as is reasonably practical.

Furthermore, every effort will be made to ensure that if the person identifying any issues in good faith will not suffer any further detriment because of making such a complaint.

## **9. Notice**

If any prospective applicant with disability seeks any reasonable accommodation measures and facilities to be provided, please do contact the Chief Human Resources Officer of the Company, Ms. Janaki Naik at [janaki.naik@tatadigital.com](mailto:janaki.naik@tatadigital.com).

Any Employee may request additional details on this Policy from the Human Resources Department (Ms. Janaki Naik at [janaki.naik@tatadigital.com](mailto:janaki.naik@tatadigital.com)), Legal Department (Ms. Poornima Sampath at [Poornima.sampath@tatadigital.com](mailto:Poornima.sampath@tatadigital.com)) or the Group Chief Ethics Counsellor (Mr. S. Padmanabhan at [spadmanabhan@tata.com](mailto:spadmanabhan@tata.com)).

#### **10. Periodic review and evaluation**

The Company will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy and effectiveness. The Company reserves the right to vary and/or amend the terms of this Policy from time to time.