

Equal Opportunity Policy

Objective:

The objective of this Policy is to ensure that there is no discrimination against any person basis their gender, sexual preference, religion, race, color or disability.

This Policy encompasses the criteria on which the selection of new staff will be done. It shall be based on the job requirement and the individual's suitability and ability to do, or to train for, the job in question. Person specifications and job descriptions shall be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment, promotion or transfer shall be assessed objectively against the requirements for the job. The Company shall strictly refrain from demonstrating bias or prejudice towards individual differences which will be valued and protected.

Scope & Applicability:

This Equal Opportunity Policy applies to all prospective or current employees of PDS Limited and all its subsidiaries, affiliates, joint ventures and group companies (referred to as “Company”) who are vulnerable to discriminatory treatment due to certain individual characteristics. It also covers employees who acquire disability during their work tenure.

Further the Company is committed to equal pay and equality of terms in employment. It believes that all its employees should receive equal pay where they are carrying out like work, work rated as equivalent or work of equal value. In order to achieve this, the Company will endeavor to maintain a pay system that is transparent, free from bias and based on objective criteria.

Definitions/Key Terms:

- a. Company - Company means PDS Limited and all its subsidiaries, affiliates, joint ventures and group companies.
- b. Act–Rights of Persons with Disabilities Act, 2016 (“hereinafter referred to as RPWD Act”) including amendments from time to time.
- c. Rules– Rights of Persons with Disabilities Rules, 2017 including amendments from time to time.
- d. Policy – Policy means the current Equal Opportunity Policy, including amendments, if any, from time to time.
- e. Liaison Officer – In accordance with Section 8(3)(e) of the RPWD Act, the Company has designated the Head/Lead of the Human Resource Department, by whatever name called.

Background:

The Government of India has enacted the Rights of Persons with Disabilities Act, 2016 and Rights of Persons with Disabilities Rules, 2017 to give effect to the principles enshrined in the United Nations Convention on Rights of Persons with Disabilities (2006). In pursuance of the RPWD Act, the Equal Opportunity Policy is adopted by PDS Limited ("this Policy"). PDS Limited (hereinafter referred to as "the Company" or "PDS") is committed to providing equal opportunities without any discrimination on the grounds of age, color, disability, origin, nationality, religion, race, gender, or sexual orientation and will not engage in any kind of verbal or physical harassment based on any of the above or any other reason.

This Policy expresses the Company's commitment to promote equality and conduct its business according to principles of social justice, respect, and freedom of expression and in accordance with the Code of Conduct of the Company.

Roles & Responsibilities:

- a. Supervisors & Managers - All supervisors and managers are responsible to ensure that policies of equal opportunity are applied at all times and that all procedures & practices are free of discrimination.
- b. Employees- Adhere to the legal guidelines, policy and principles.
- c. Liaison Officer : To Oversee the implementation of the Equal Opportunity Policy, address any complaints and responsible for:
 - Ensuring a disable friendly workplace;
 - Ensuring that all employees are aware of this policy and know their duties and rights in relation to the Policy; and
 - Developing proactive strategies to prevent discrimination and harassment.

Procedures/Implementation:

- All supervisors and managers are responsible to ensure that policies of equal opportunity are applied at all times and that all procedures & practices are free of discrimination. All employees are obliged to follow legal guidelines and equal opportunity employer principles.
- In cases when these rules are violated, employees can take up the matter with their Line Manager or HR, as appropriate.
- If the issue is not resolved, they can report to the Liaison Officer. The complaint shall be investigated by the Liaison Officer within 15 days of receipt and reported to a Committee comprised of the Group CEO, Group CFO, and Group General Counsel. The Committee shall take action on the investigation report within 7 days from the date of submission of the report.
- The aggrieved employee shall be protected against any kind of harassment, retaliation,

and victimization.

Compliance & Consequences:

- This Policy shall be published on the internal HRIS portal (Qandle).
- The Company shall regularly monitor the effects of selection decisions and personnel practices and procedures in order to assess whether equal opportunity is being achieved.
- The Company reserves the right to take disciplinary action or initiate criminal proceedings as and when it considers necessary in respect of all reported cases of violations of this policy.
- If anyone is involved in harming, injuring or endangering the life, safety, health or well-being, whether mental or physical, of a transgender person, differently abled person or any other vulnerable person through acts including but not limited to causing physical abuse, sexual abuse, verbal and emotional abuse and economic abuse shall be punishable as per the applicable law and appropriate disciplinary action will be taken.

Process Flow:

- a. Identification of Roles- The Company identifies posts/vacancies suitable for persons with special abilities/differently abled.
- b. Review of Terms & Benefits- All terms of employment, benefits, facilities & services will be reviewed from time to time in order to ensure that there is no unlawful direct or indirect discrimination because of one or more protected characteristics.
- c. Equal Opportunity Actions-
 - Use of inclusive, diversity-sensitive language in all official documents and signs.
 - Leave and flexible work arrangement policies to provide for parental, medical or other needs.
 - Hiring, training & evaluation processes that only focus on characteristics relevant to employment, job specifications, qualifications, productivity etc.
 - Ensuring the required employment benefits are provided to everyone irrespective of their gender, sexual preference, special ability, race, color, etc.
 - Infrastructure facilities, measures put in for safety & security, and amenities to be provided to employees so as to enable them to effectively discharge their duties in the establishment.
 - Open door practices to make the reporting of unlawful discriminatory conduct easier.
 - Active encouragement of employees to propose improvements and explicit prohibition of discrimination with clearly defined consequences.

Related Documents:

The Company shall maintain below mentioned records/documnets reflecting the details of the persons with special abilities that it has employed:

- No. of persons with special abilities employed and the date from which employed.
- Name, gender and address of such persons.
- Nature of special ability of such persons.
- Nature of work rendered by such persons.
- Kind of facilities provided to such persons.

Ownership and Review:

Ownership: This Policy shall be owned and administered by the department of Human Resources.

Review: This Policy shall be reviewed by the Human Resources Team as and when required.

Version History:

Version No.	Approved on	Created by	Approved by
1.	March 21, 2024	Human Resource & Compliance Team	Board of Directors

