

Equal Employment Opportunity Policy for Persons with Disabilities

A) Background

The Code of Conduct (“Code”) of One97 Communications Ltd. (hereinafter referred to as “One97” or the “Company”) stipulates equality and non-discrimination for One97 and all its affiliate companies. It states that the Company shall provide equal opportunities to all its employees / personnel and all qualified applicants for employment, without regard to their race, caste, religion, colour, ancestry, marital status, work experience, gender, sexual orientation, age, nationality, ethnic origin or disability. It also states that Human Resource policies shall promote diversity and equality in the workplace as well as compliance with all local labour laws, while encouraging the adoption of international best practices.

Objective

In keeping with the Code, the Company has devised this policy on equal employment opportunity for persons with Disability(ies) (as defined in paragraph B below), namely, Equal Employment Opportunity Policy for Persons with Disabilities (“Policy”) to protect and further the interests of persons with Disabilities employed with it. The Policy outlines One97’s approach towards Disabled employees.

- a) This Policy describes how we can create an inclusive workplace and work culture in which Disabled employees are treated with respect and dignity.
- b) This Policy is designed to create equal opportunity(ies) in all aspects of employment for Disabled employees and also to create and maintain a non-discriminatory and inclusive work environment which enables robust career advancement for people with Disabilities, including those who acquire Disability during their employment tenure.
- c) This Policy is designed to provide adequate facilities and amenities to the persons with Disabilities to enable them to effectively discharge their duties in the Company.

This Policy is in accordance with the provisions of The Rights of Persons with Disabilities Act, 2016 along with Right of Persons with Disabilities Rules 2017 (“Act”). The Company shall always abide by the principles of the Policy in letter and in spirit.

B) Applicability

Policy is applicable to One97 and intends to cover all employees including ‘Persons with disability’ (as defined below) , Specified Disability(ies) (as defined below), ‘Persons with benchmark disability’ (as defined below) and employee(s) having ‘High Support’ needs (as defined below) (all collectively defined as “Disability(ies)”) as declared by the employee.

They could be job applicants, full-time/part-time employees, interns/trainees, contractual employees, including temporary employees. It also covers those employees who acquire disability during their work tenure.

C) Definitions as per the Act

“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.

“High support” means an intensive support, physical, psychological and otherwise, which may be required by a person with benchmark disability for daily activities, to take independent and informed decision to access facilities and participating in all areas of life including education, employment, family and community life and treatment and therapy.

“Reasonable accommodation” means necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden in a particular case, to ensure persons with disabilities enjoy or exercise equal rights as others.

“Person with disability” means a person with long-term physical, mental, intellectual or sensory impairment which, in interaction with barriers, hinders his/her full and effective participation in society equally with others.

“Person with benchmark disability” means a person with not less than forty percent of a specified disability where specified disability has not been defined in measurable terms. It also includes a person with disability where specified disability has been defined in measurable terms by a certifying authority.

“Specified disabilities” are the disability categories mentioned in the Schedule of the Act. There is also “any other category”, which allows the Central Government to add any other disability by issuing a notification.

The disability categories as mentioned in the Schedule are:

1. Locomotor disability
2. Muscular Dystrophy
3. Leprosy cured
4. Dwarfism
5. Cerebral Palsy
6. Acid attack Victim
7. Low vision
8. Blindness
9. Deafness
10. Hard of Hearing
11. Speech and Language disability
12. Intellectual Disability
13. Specific Learning Disability
14. Autism Spectrum Disorder
15. Mental illness

16. Chronic Neurological Conditions
17. Multiple sclerosis
18. Parkinson's disease
19. Haemophilia
20. Thalassemia
21. Sickle Cell disease
22. Multiple Disabilities

D) Policy details

1. Facilities & Amenities:

a) Physical infrastructure:

The Company will ensure that suitable and appropriate facilities and infrastructure are provided to employees with Disabilities to enable them to effectively discharge their duties in the establishment.

One97 shall use its best efforts to ensure that its physical infrastructure (buildings, furniture, facilities and services in the building/campus) adheres to the accessibility standards given in the Harmonised Guidelines and Space Standards for Barrier Free Built Environment for Persons with Disabilities and Elderly Persons, 2016 and the National Building Code, 2016. Where its not possible to do so, the Company s shall use its best efforts to cater, to the extent it can, to the needs of all employees in its existing buildings. The Company shall use its best efforts to offer specially tailored programmes for employees with Disabilities.

b) Digital infrastructure:

It is One97's continuous endeavor to ensure that all its documents, communication and information technology systems adhere to the accessibility standards. The Company shall use its best efforts to ensure that its digital infrastructure adequately caters to the needs and requirements of Disabled employees.

2. List of positions offered

At One97, all positions are open to people with Disabilities. The hiring is purely based on merit, and candidates are evaluated based on their skills and competence for the job / role in question. While all candidates can apply to all available job and positions, certain kind of jobs may not be suitable and may impact health and safety of candidates with Disabilities, for instance, field jobs. In such a scenario, the Company shall, use its best efforts to offer skilled and qualified candidates other roles as appropriate.

3. Manner of selection

a) Vacancy advertisement and application Open positions (subject to certain specialized exceptions) are published on One97 career site, social media and job portals. These positions are open to people with Disabilities subject to Clause 2 above. Our key focus is to ensure that all our existing sourcing channels and methods are inclusive.

b) **Selection process:** The selection process is and shall be the same for all candidates. However, reasonable flexibility and accommodation is and will be provided to job applicants with Disabilities as required.

4. Maintenance of records

One97 shall maintain, below mentioned records reflecting details of the Disabled persons employed: a) Number of persons with Disability(ies) employed with the respective date of commencement of employment; b) Name, gender and address of the persons with Disability(ies); c) Nature of Disability of such persons; d) Nature of work rendered by such Disabled person; and e) Kind of facilities provided to persons with Disability(ies).

The records maintained shall be open to inspection at all reasonable hours to such persons as may be authorised in their behalf by the appropriate Government. Confidentiality of the data will be maintained with access being provided only to employees who have a 'need to know', for instance, in order to provide security, to ensure provision of reasonable accommodations, etc.

5. Liaison Officer:

One97 shall always have a Liaison Officer, for persons with Disabilities as per the mandate of the Central Rules under the RPWD Act. Such Liaison Officer will coordinate with the various concerned departments and shall be responsible for ensuring that employees and job applicants with Disability(ies) receive reasonable accommodation for performing their job and participating in the selection process on an equal basis with others. She/he will also raise awareness among all employees in the Company to create an inclusive work environment. The board of directors of the Company shall appoint the Liaison Officer for the purposes of this Policy. The board of directors of the Company shall authorize the General Counsel and the Head HR of One 97 to jointly approve any appointment, removal or change of the Liaison Officer under this Policy, whenever any such change is required for any reason whatsoever.

E) Role of Human Resources Team

One97's HR Team is conditioned to treat all persons as equals and based on their merit. Their approach towards persons with Disabilities is as per this Policy including but not limited to paragraphs B and C above.

F) Role of Admin Team & IT Infrastructure team

Our IT infrastructure and admin teams will use best efforts to create an accessible and inclusive environment at workplace as per the terms of this Policy including but not limited to paragraph D (1)(a) above.

G) Discrimination

One97, as an employer, is committed to ensure that no discrimination is or will be practiced against a Disabled employee. We ensure that there is no discrimination in the opportunities for employees with Disability for promotion, transfer, training or receiving any other benefit and that they are treated at par with all other employees. We discourage dismissing or subjecting an employee with Disability to any discrimination. We ensure and will continue to ensure that there is no Disability related discrimination or victimization and by inter alia, educate and create awareness among all employees, especially managers, about working with employees with Disabilities.

a) Role of Managers - All Managers

All Managers and Supervisors are responsible for eliminating any discrimination or intimidation against Disabled employee of which they are aware. Failure to do so will be treated as a failure to fulfill one of the responsibilities of their position. Managers are expected to sensitize the teams for equal and unbiased treatment of employees with Disability.

b) Role of Employees –

Employees needs to be sensitive while interacting with employees with Disability. Employees are expected to avoid any such phrases, words which explicitly or implicitly indicate the Disability of the fellow Disabled employee. Employees should refrain to comment on work performance, physical conditions and any additional occupational support extended to Disabled employees in organization. If any employee notices any such activity, he may directly reach out to his/her Manger/HRBP or Compliance officer as he/she may deem fit.

c) Role of Disabled Employees-

Employees who believe they have been unfairly discriminated on grounds of Disability should report the alleged act(s) to the appropriate line Manager or HR business partner. In cases where this is not appropriate (i.e. where the line Manager or HR business partner is the person against whom the complaint is being made), then the employee should report the alleged act to the compliance officer appointed by One97. Please refer to Complaints Redressal Mechanism in this Policy.

H) Complaints Redressal Mechanism

Any Disabled employee or any employee on behalf of Disabled employee can raise grievance under this Policy. The process is as follows:

(i) Level 1 – If the Employee faces any issues, he/she should reach out to

a) For Admin related issues - adminteam@paytm.com

b) For IT related issues – Itteam@paytm.com

c) For Travel related issues – travel@paytm.com d) For HR related issues – Respective HRBP

(ii) Level 2 - Employee should highlight the case to his/her Line Manager in writing if the issue is not resolved at 1st level. If line Manager fails to address the grievance or if the complaint is against Line Manager, then the Employee should reach out to HRBP of his/her respective business.

(iii) Level - 3 In case the employee is not convinced or satisfied with the resolution provided by Manager &/or HRBP, he/she may raise his/her grievance with the grievance redressal officer appointed by One 97 as per this Policy, in respect to Disability related grievances. Employee may reach out to Wecare@paytm.com addressing it to the grievance redressal officer. The board of directors of the Company shall appoint the grievance redressal officer for the purposes of this Policy. The board of directors of the Company shall authorize the General Counsel and the Head HR of One 97 to jointly approve any appointment, removal or change of the grievance redressal officer under this Policy, whenever any such change is required for any reason whatsoever.

(iv) Managers/HRBP's/Compliance Officer are expected to address the grievance on priority upon the receipt of such a complaint if in relation to behavior/treatment with any other employee. Complaints related to infrastructural support need to be highlighted to Admin/IT Team immediately and take timelines for closure of such request and share with Disabled employees promptly.

I) Communication/ Publication of Policy:

Policy will be available on intranet (Deep Purple) to all employees and our corporate website. It will also be available at all conspicuous places in branch, factories and Head Office. All employees will undergo a training on Code of Business Conduct, which form a basis of this Policy, through e-modules and/or classroom sessions.

J) Review Timelines

The Policy will be reviewed basis changes in legal and market guidelines.

K) Interpretation & Guidance

In the event that any additional guidance and/or further interpretation is required, an employee shall contact their local Human Resources representative.