

ASEEM INFRASTRUCTURE FINANCE LIMITED (AIFL or COMPANY)

EQUAL OPPORTUNITY POLICY

Reviewing & Approving Authority

Authority	Designation
Prepared By	Senior Vice President - Human Resource
Reviewed By	Chief Executive Officer
Approved By	Board of Directors
Date of approval	November 10, 2025

Version History

Version	Issue Date	Brief Description
V.1	November 13, 2024	New Policy Adopted
V.2	November 10, 2025	Annual Review with no change

EQUAL OPPORTUNITY POLICY

Aseem Infrastructure Finance Limited (hereinafter referred to as “**AIFL**”) is an Equal Opportunities Employer. The organization is committed to fostering an inclusive and diverse workplace in which all employees are treated with respect and dignity.

We maintain a zero-tolerance policy toward any form of discrimination, harassment, or prejudice against any employee. AIFL is committed to eliminating all forms of unlawful discrimination (including direct discrimination, indirect discrimination and denial of reasonable accommodation), bullying and harassment of employees.

The policy is in line with the provisions of The Right of the Persons with Disability Act, 2016 (“**RPWD Act, 2016**”) and Transgender Persons (Protection of Rights) Act 2019.

1. Scope:

The policy covers job applicants, apprentices, contract workers, full time/part time employees, interns/trainees of any race, colour, religion, caste, gender identity/expression, sexual orientation, disability, pregnancy, social origin or status, indigenous status, political orientation, age, marital status or any other personal characteristic or status protected by law. This policy includes person with disabilities (PWD), including employees who acquire disability during their work.

2. Hiring Practices and Policies

At AIFL, all positions are open for all eligible candidates including male, female, transpersons, people with disabilities (PWD), different sexual orientation etc.

The hiring is purely based on merit and the candidates are evaluated based upon their skills and competence.

Flexibility and support will be provided to persons with disabilities on an individual basis, depending upon the need and requests.

3. Reasonable Accommodation:

AIFL will make reasonable accommodations, whenever necessary, for qualified employees or job applicants who have disabilities, as per the RPWD Act, 2016. Such accommodation would be provided: 1) to ensure equal opportunity in the application and selection process, 2) to enable an employee with a disability to perform the essential functions of a job, and 3) to enable an employee with a disability to enjoy the same benefits and privileges of employment as non-disabled employees. Examples of reasonable accommodation may include (but not limited to) acquiring or modifying equipment or devices, modifying assessment and training materials, modifying work schedules, and reassignment to a vacant position. Employees or job applicants who require such accommodation should write to the HR, providing the details of their requirements.

4. Training and Career Progression:

AIFL will endeavor to provide course materials meant for induction and training in accessible formats on request. The request for reasonable accommodation, such as assistive aids, accessible training venue, accessible materials, interpreter etc. should be placed at least (one week prior) to the scheduled date of commencement of induction/training.

If an employee acquires a disability during her/his employment tenure, she/he can return to work upon attaining fitness at the same grade as before. In case the employee is unable to perform the current role, the organization will explore re-skilling the employee for another role available in the organization.

All career progression and promotions at AIFL will be purely based on merit, in line with Company Policies and without any discrimination or bias.

5. Equal Remuneration and Benefits:

There will be no discrimination on remuneration and benefits based on race, colour, religion, caste, gender identity/expression, pregnancy, sexual orientation, disability, social origin or status, indigenous status, political orientation, age, marital status or any other personal characteristic or status.

We will enable smooth transitions of employees into and back from journey of parenthood to AIFL.

6. Special Leave:

An employee's request for extra leave, for a reason related to her/his disability, will be treated as a request for reasonable accommodation and will be evaluated accordingly.

7. Employee Engagement and Social Inclusion:

AIFL will endeavor to make all company events and meetings inclusive by ensuring that these are conducted at accessible venues with a provision of reasonable accommodation being available to employees with disabilities.

AIFL will also strive to create a culture of inclusion where people can bring their authentic selves to work and all gender identities and sexual orientation are welcome and respected. There will be no discrimination or exclusion from social events, engagement activities, community connects or any other activities for any employee.

8. Facilities, Amenities and Conformation with Accessibility Norms:

Any employee with disabilities facing accessibility issues should report to the admin team. Additionally, the following infrastructure will be given to the employees with disabilities:

a. Physical Infrastructure

1. Car-Parking
2. Provision for ramps at appropriate locations

b. Digital Infrastructure

It is AIFL's continuous endeavor to ensure that all our documents, communication and information technology systems adhere to accessibility standards. Any employee with Disability facing accessibility challenges can reach out to the IT support team.

c. Travel, Stay and Transport

For official travel, employees with disabilities will be provided accessible modes of transport and accessible guest houses and hotels. An employee can place a written/email request for this with the Admin team.

9. Maintenance of Records, Privacy and Confidentiality

We understand and respect that sharing information about one's gender identity is a personal preference.

In case of Transgender Persons who are citizens of India, concerned persons can share their transgender certificate issued by District Magistrate or Identity Card issued by the concerned authorities. The employment records and other relevant records (e.g payroll, retirement accounts etc) can be updated accordingly.

Confidentiality of data will be maintained, and it will be ensured that necessary support is provided to the transgender employees.

Employees are expected to respect the privacy of their colleagues and refrain from disclosing any such information without explicit consent.

10. Complaint and Redressal

- a. If an employee believes she/he has been subjected to any form of discrimination, or if they know of another employee who has been the subject of discrimination, they can complain to the Grievance Redressal Officer and Complaint Officer, as specified in the 10.d and 10.e of this policy.
- b. The organization will undertake a thorough and objective investigation and attempt to resolve the situation.
- c. If it is determined through the investigation that a violation has occurred, effective remedial action will be taken to commensurate with the severity of the offense, up to and including termination.
- d. The organization has appointed Mr. Shishir Kumar (Shishir.kumar@aseeminfra.in) as Grievance Redressal Officer under the RPWD Act 2016 for AIFL.
- e. The organization has appointed Ms. Shruti Trivedi (shruti.trivedi@aseeminfra.in) as the Complaint Officer under Transgender Persons (Protection of Rights) Act 2019.