

EQUAL OPPORTUNITY POLICY

1. Purpose & Scope

1.1. The purpose of this Equal Opportunity Policy (“Policy”) is to promote fairness, inclusion, and non-discrimination in all employment and business practices of the brokerage, ensuring that all persons are treated with dignity and respect irrespective of their background, and consistent with regulatory expectations.

1.2. This Policy applies to:

- All employees (permanent, contractual, part-time, trainees, interns)
- All vendors, third parties, agents, consultants engaged by the brokerage
- Recruitment, internal transfers, promotions, training, remuneration, benefits, termination.
- Interactions with clients, counterparties and other stakeholders where relevant

1.3. This Policy shall be read in conjunction with the company’s other policies (e.g. Code of Conduct, Anti-Harassment Policy, Grievance Redressal Policy) and applicable laws/regulations, including SEBI regulations, labour laws, and anti-discrimination statutes.

2. Policy Statement

2.1. Non-Discrimination & Equal Treatment.

The brokerage is committed to providing equal opportunity to all individuals without discrimination on grounds of race, colour, sex, gender identity or expression, sexual orientation, religion, caste, creed, age, marital status, disability, veteran status, genetic information, or any other characteristic protected under Indian law.

2.2. Merit-Based Employment Decisions.

Decisions relating to recruitment, hiring, promotion, transfer, compensation, training, benefits, termination, and other terms of employment shall be based on bona fide qualifications, skills, performance, experience and business needs — not on any impermissible consideration.

2.3. Reasonable Accommodation for Disabilities.

In compliance with the Rights of Persons with Disabilities Act, 2016 (and rules thereunder), the brokerage shall provide reasonable accommodation to qualified employees or applicants with disabilities, unless doing so would cause undue hardship. This includes modifications to work environment, specially adapted equipment, assistive devices, and flexible working arrangements where feasible.

2.4. Equal Remuneration.

The brokerage shall ensure that men and women (or persons of other genders) receive equal remuneration for work of equal value, and that wage differences are not based on discriminatory factors. Differences in pay should be based only on objective factors like experience, qualifications, performance, responsibilities, etc.

2.5. Zero Tolerance for Harassment & Retaliation

Any form of harassment — sexual harassment, bullying, or hostile behaviour — especially if targeting a protected class, is strictly prohibited. The brokerage shall maintain a safe and respectful work environment. Retaliation against anyone raising a complaint in good faith or participating in an investigation is prohibited.

3. Roles & Responsibilities

Stakeholder.	Responsibilities.
Board of Directors / Senior Management	/ Endorse this policy, provide oversight, ensure adequate resources and leadership commitment.
Chief Compliance Officer / HR Head	Implement and monitor this policy, set up mechanisms for reporting, training, audits, grievance redressal.
Managers / Supervisors	Ensure team adherence; treat employees fairly; intervene promptly in issues of discrimination; escalate grievances.
Employees / Contract Staff / Agents	Comply with the policy, treat others with respect, report violations, cooperate in investigations.
Third Parties / Vendors / Consultants	/ Adhere to equal opportunity principles as a contractual obligation; any violation could lead to contract termination.

4. Recruitment, Promotion & Training

4.1. Job postings shall reflect equal opportunity intent (e.g. “We are an equal opportunity employer”).

4.2. Shortlisting and selection shall be based on objective criteria; interview panels should, where feasible, be diverse.

4.3. All employees shall have access to training and development opportunities without discriminatory practices.

4.4. Internal promotions and transfers shall follow a transparent process; employees may appeal or seek clarification as per grievance mechanism.

5. Grievance Redressal & Reporting

5.1. The brokerage shall establish a mechanism to receive, investigate and resolve complaints of discrimination, harassment or policy violations, in a fair, timely and confidential manner.

5.2. The complainant and the respondent will have an opportunity to present their views. Investigations shall be impartial and carried out by designated persons or an external expert if needed.

5.3. If a complaint is found valid, appropriate corrective action (counseling, disciplinary action, termination, etc.) will be taken.

5.4. The brokerage shall protect complainants against retaliation, and maintain strict confidentiality to the extent possible.

5.5. All grievances and their resolution should be documented and reported periodically (without breaching confidentiality) to senior management / board / audit/compliance committee.

6. Monitoring, Audit & Compliance

6.1. Regular audits (internal or external) shall assess compliance with this Policy, including hiring, pay parity, promotions, grievance resolution, accommodations.

6.2. Key metrics (e.g. diversity statistics, number of complaints, resolution time) shall be maintained and reviewed periodically by the Compliance / HR function and reported to senior management.

6.3. Non-compliance will be addressed promptly; recurring issues shall lead to escalation and systemic remediation.

7. Training & Awareness

7.1. All employees, especially hiring managers and supervisors, shall receive periodic training on equal opportunity, unconscious bias, diversity & inclusion, harassment prevention, accommodating disabilities, etc.

7.2. The Policy shall be communicated broadly (on intranet, induction programs, employee handbooks), and made accessible to all.

8. Review, Amendment & Interpretation

8.1. This Policy shall be reviewed at least annually (or more frequently if required) to ensure relevance, legal compliance, and alignment with evolving best practices.

8.2. Changes in Indian law, SEBI circulars or regulatory guidelines shall be reflected in the Policy in a timely manner.

8.3. In case of any conflict between this Policy and applicable law or regulation, the law or regulation shall prevail, and this Policy shall be construed accordingly.

8.4. The Compliance / HR Head is authorized to interpret this Policy and issue guidelines for its implementation, subject to oversight by senior management.

9. Illustrative Examples of Prohibited Practices

- Rejecting or refusing to hire a candidate solely because of gender, disability, sexual orientation, caste, religion, etc.
 - Paying lower wages to a woman, transgender, or person with disability for work equal in value to that performed by others.
 - Denying promotion or training opportunities because of one's marital status or caregiving responsibilities (unless bona fide and justified).
 - Harassing or retaliating against someone who raises a discrimination complaint.
 - Failing to provide accessible workstations or assistive devices to a person with disability when such accommodations are reasonable.
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10. Alignment with SEBI / Regulatory Expectations

While SEBI may not have issued a specific “Equal Opportunity Policy” circular for brokers (as of date), its overarching regulatory philosophy emphasizes:

- Investor protection, fair market practices, governance, and transparency (e.g. via master circulars for brokers).
- Ensuring accessibility and inclusion: e.g., SEBI recently mandated that digital platforms of regulated entities (including brokers) be accessible to differently-abled persons under the Rights of Persons with Disabilities Act.
- Adherence to statutory laws and corporate governance norms.

Therefore, embedding this Equal Opportunity Policy enhances the firm's compliance posture, governance reputation, and internal culture.

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