POLICY OF EQUAL OPPORTUNITY, NON-DICRIMINATION & ANTI-HARASSMENT AT THE WORKPLACE

FLAMMER'S COMMITMENT TO PROVIDE A SAFE, DIVERSE & COMFORTABLE
WORKPLACE





1ST APRIL 2024 DOC. NO. FTPL/HRD/P/9 FLAMMER TECHNOLOGIES PRIVATE LIMITED



1 Objective

Flammer Technologies Private Limited aims to maintain a work environment in which people are treated with dignity and respect. We firmly believe that everyindividual within the organization has the right to work in an atmosphere that promotes equal employment opportunities. We strive to create anenvironment characterized by mutual trust and respect that enables employees to perform to their best potential in absence of intimidation, oppression, exploitation, discrimination or harassment of any kind. The Anti-Harassment policy of the company strictly prohibits all forms ofharassment – sexual or non-sexual and expects professional behaviour among employees at workplace which is free from bias, prejudice and discrimination. FTPL shall make every reasonable effort including sensitization and training to create awareness on the policy.

2 Definitions

2.1 Equal Opportunity

To recruit, hire, compensate, train, evaluate and promote covered **FTPL** employees without regard to race, colour, religion, sex including pregnancy, age, national origin, disability status, sexual orientation, gender identity or expression, or genetic information, except where sex, mental, or physical requirements constitute bona-fide occupational qualifications necessary for efficient job performance. **FTPL** will take proactive measures in support of equal opportunity in recruitment, hiring, career advancement, and treatment of covered County employees.

2.2 Discrimination

"Discrimination" includes applying different conditions or standards of employment or work (including but not limited to recruitment, employment, promotion, progression (vertical/lateral), transfer, training, working conditions, pay parity, wages and its administration, employee benefits, and application of policies), to individuals or employees, directly or indirectly disadvantaging certain individuals or employees, or refusing them employment or promotional opportunities without any reasonable cause or solely on the basis of their gender, gender identity or expression, sexual orientation, age, place of birth, descent, ethnic or national origin, religion, community, caste, race, colour, physical appearance, marital status, pregnancy, ability, or any other characteristic protected by law.

2.3 Harassment

"Harassment" includes any kind of unwelcome act or behaviour in the Workplace, direct or indirect, obvious or subtle, of a vexatious, disrespectful, offensive, intimidating, humiliating, demeaning, abusive, hostile, oppressive, or derogatory nature. Such unwelcome behaviour may be physical, verbal, or non-verbal. Illustrations of Harassment include being subjected to any Discrimination or discriminatory practice/s, derogatory statements about an individual's gender, gender identity or expression, sexual orientation, age, place of birth, descent, ethnic or national origin, religion, community, caste, race, colour, physical appearance, marital status, pregnancy, disability, or other protected status, as well as microaggressions and bullying by or towards any Employee.



3 Prohibited Conduct under the Policy

The following (but not limited) are considered forms of harassment and will warrant investigation and appropriate action:

3.1 Sexual Harassment:

The definition, scope and repercussion are decided by "Internal Actions Committee" (IAC) as per the company's "Policy on Prevention, Prohibition and Redressal of Sexual Harassment at Workplace".

3.2 Non-sexual harassment & Discrimination:

- I. Any form of discrimination towards an employee is strictly prohibited, including but not limited on the basis of race, skin colour, caste, religion, ethnicity, national origin, sex (including pregnancy), age, disability, class, place of birth, HIV status, sexual orientation, gender identity, marital status, religious belief or lack of religious belief, life expectancy, or any other status protected by the laws or regulations in the locations where we operate.
- II. Bullying / Workplace Violence We do not tolerate violent acts or threats of violence, verbal, non-verbal or in writing. We will not tolerate fighting, bullying, coercion, or use of abusive or threatening words or actions directed to, about, or against any employee of the company.

3.3 Retaliation

Retaliation of any sort for filing a claim of harassment will not be tolerated. No hardship, loss, benefit or penalty may be imposed on an employee in response to:

- i. Filing or responding to a complaint of discrimination or harassment.
- ii. Appearing as a witness in the investigation of a complaint.
- Serving as an investigator of a complaint.

The policy should not be taken in a manner that disrupts the spirit of the purpose it was created. Any violation of the policy will be subjected to disciplinary action.

4 Redressal Committee:

Internal ActionsCommittee (IAC) will be empowered to deal with all kinds of harassment. The constitution of the committee will be same as previously decided for Sexual Harassment. The decision of the committee shall be final and binding. It will be responsible for includes (but not exhaustive of):

- Making the complaint and any accused individual(s) aware of the gravity of misconduct
- ii. Arrangement of immediate investigation of alleged misconduct
- iii. Making recommendations for remediation to designated company officials
- Exploring informal means of resolving potential harassment
- v. Notifying appropriate authorities when criminal activities are alleged.



5 Reporting

Employees who are aware of possible violations of this policy must immediately contact their Manager, Human Resources representative or report the same to IAC. The reporting process will be in reference with the Disciplinary Action Policy & Grievance Redressal policy depends upon the seriousness of the particular issues. Managers who become aware of potential violations of this policy must immediately report the information to Human Resources. The IAC is responsible to promptly and effectively reviewing all the potential violation and taking action to address as appropriate.

6 Confidentiality

All complaints and investigations shall be treated confidentially. The IAC will take adequate steps to ensure that the complainant is protected from retaliation during and after the investigation. All information pertaining to a complaint or investigation under this policy will be maintained in secure files within the HR department.

7 False Allegations

Upon the conclusion of an inquiry, if the IAC arrives at a conclusion that the aggrieved individual falsely or maliciously accused the alleged perpetrator of Discrimination and/or Harassment at the Workplace, then such a person shall be subject to appropriate disciplinary action as determined by the Governance Group in accordance with the internal misconduct rules of FTPL.

8 Training & Awareness

IAC shall endeavour to create awareness about, as well as sensitise Employees to be aware of issues involving, Discrimination and Harassment at the Workplace. The communication will be made

accessible for the Person with Disabilities as required. IAC shall conduct or cause to be conducted, workshops and training programmes at regular intervals to sensitise Employees on all forms of Harassment and Discrimination at the Workplace, and it shall be the duty of each Employee to attend the same.

____s/d Director

Flammer Technologies Pvt. Ltd.

Director

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Director