



Equal Opportunity Policy

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Introduction

Universal Sampo General Insurance Co. Ltd. (USGI / the Company) is committed towards treating all its employees and job applicants equally and expresses the company's commitment to promote equal employment and growth opportunities, without any discrimination on the grounds of age, colour, disability, marital status, nationality, race, religion, sex, sexual orientation, or any other form of discrimination.

USGI recognizes the value of a diverse workforce. We are committed to providing equal opportunities in employment and creating an inclusive workplace and work culture in which all employees are treated with respect and dignity.

USGI follow highest standards of integrity, honesty, fairness, and ethical conduct while upholding the principles of equal opportunity, promotion, diversity and inclusion, and reporting and resolving of any incident of discrimination or harassment.

Objective

This Policy is in accordance with the provisions of The Rights of Persons with Disabilities Act, 2016 and Rules framed thereunder. Main objective of this policy is to ensure that the persons with disabilities enjoy the right to equality, life with dignity and respect equally with other similarly placed employees. The policy is intended to empower the employees with disabilities and enhance their engagement with the organisation.

USGI is committed towards treating all its employees and job applicants equally. Our Equal Opportunity Policy expresses company's commitment to promote equal employment opportunities, without any discrimination on the grounds of age, colour, disability, marital status, nationality, race, religion, sex, sexual orientation or any other form of discrimination and will not engage in any kind of verbal or physical harassment based on any of the above or any other reason.

The policy is subject to qualifications / merit / suitability of the individual and further subject to applicable rules, regulations and guidelines issued by the government from time to time.

USGI shall take steps to utilize the capacity of persons with disabilities by providing appropriate working environment.

There shall be no discrimination against any person with disability in any manner relating to employment and promotion thereof.

It shall be endeavor of the USGI to provide reasonable accommodation, subject to availability and appropriate barrier free and conducive environment for persons with disability for easy access to workstations.

Scope

The Equal Opportunity Policy covers all persons with disability in the company. It also covers employees who acquire disability during their service period/ work tenure.

The policy applies to all aspects of employment which starts from recruitment, training, promotion, working conditions, salary and allowances, staff welfare, facilities and perquisites, transfer and posting and payment up to terminal benefits.

To achieve the objective of policy, we at USGI will strive and ensure follows:

1. All employees of the company are personally responsible for treating each other with respect and dignity, which includes respecting the rights and difference of opinion.
2. Equal pay and terms of employment (including benefits, training, promotions, performance reviews, transfers, exits etc.) without any bias.
3. A transparent and standard rewards framework shall be applicable to all employees which is objective driven basis individuals' roles, qualification, experience and duties.
4. Developmental and promotional opportunities will be based on performance, ability and potential and will be consistent with the needs of the business.
5. USGI will not tolerate harassment, behaviour that is discriminatory or behaviour that victimizes any individual or group in our workplaces based on caste, creed, religion, disability etc.
6. No opportunity, as may be suitable to a Differently Abled person, will be denied to any such person basis only on his/her disability. It is clarified that merit shall be the sole criteria of appointment of Differently Abled persons on positions suitable for such persons.
7. If an employee feels he or she is being subjected to discrimination, harassment, bullying or victimization, he or she can file a complaint of such behavior with the Liaison Officer. All

grievances shall be taken seriously and treated with sensitivity, fairness and in confidence and confidential manner, wherever required.

6. If an employee acquires a disability during her/his employment tenure, she/he can return to work at the same rank as before. In case the employee is unable to perform the current job, the organization will invest in re-skilling the employee for another position at the same rank or higher.

Equal Opportunity for Person with Disabilities

In accordance with the provisions of the Rights of Persons with Disabilities Act, 2016 and Rules framed thereunder, it is USGI's commitment to ensure that the work environment is free from any discrimination against persons with disabilities.

To enable the persons with disabilities to effectively discharge their duties, the USGI, may subject to regulatory guidelines, availability of devices, administrative constraints provide following facilities and amenities to them.

- USGI will strive providing aids and appliances, assistive devices suitable to their needs viz. Ramp with Rails, Lift with Braille Signage and audio prompts, accessible Washrooms , Reserved Parking for PwD's, Broad Access Pathways , Doctors Room, Accessible Drinking Water Stations and Pantry boys to serve water when needed and Accessibility software enablement on screen like magnifier, audio prompts, read aloud function by which the persons with disabilities could perform their duties efficiently.
- Conveyance allowance to be paid to persons with disabilities as per government guidelines issued from time to time.

Further, the USGI will ensure the following:

- a) That no opportunity is denied to persons with disabilities, merely on ground of disability.

- b) Individuals with disabilities who apply or employees who believe themselves to be covered by the Rights of Persons with Disabilities Act, 2016, should contact the People Business Partner.
- c) Any information obtained with regard to disabilities is voluntary, will be kept confidential, if the applicant so desires. Same will be used in accordance with applicable laws. Refusal to provide information will not subject an employee or applicant to any adverse treatment.
- d) Employees and applicants will be protected from coercion, intimidation, interference, discrimination or retaliation for filing a complaint or assisting in an investigation under the Act. Appropriate action will be taken if any employee is found breaching this policy either through discrimination, harassment, bullying or victimizing another employee.
- e) Other employees of the company will be suitably trained and sensitized towards the need and requirements of PwD and will appropriately co-operate with them at the work station.
- f) Provisions of this policy will apply in career progression and promotion of PwD's mutatis mutandis.

Selection and Training

1. USGI will follow a transparent process in selection and training. Appointment will be based on merit and without any bias to the disabilities of a prospective candidate.
2. Selection criteria (job description and employee specification) will be kept under constant review to ensure that they are non-discriminatory and relate purely to the skills needed for the job.
3. Wherever possible, vacancy advertisements will include an appropriate statement on equal opportunities for Differently Abled Persons.
4. Applicants invited for an interview should inform, if they require any individual support or assistance prior to the interview. The company shall make all arrangements reasonably feasible to accommodate these requests.
5. Candidate with necessary Disability Certificate issued in accordance with the Act by the competent authority will be considered for identified positions.
6. No person with disability will be denied any employment opportunity on grounds of disability and as such, all the vacancies will be filled based on individual's competence, ability, trainability and suitability in relation to the overall job requirements;

7. Any statutory directions/ notifications applicable to the person with benchmark disabilities with regards reservations and other facilities/ concessions shall be strictly adhered to.
8. Post suitable for PwD shall be identified based on respective category of person with benchmark disabilities and in line with the directions/ notification issued by statutory authorities from time to time, if any. It should be ensured that the PwD employees are posted on profiles which are conducive for them to work efficiently and effectively.
9. Post induction training is an essential component of the service requirement of an employee. Induction training program for the persons with disabilities shall be imparted together with the other employees.
10. As the case maybe, job specific post-recruitment training for PwD employees may be conducted to enable them to carry out their jobs effectively.
11. The necessity of training and its nature shall be determined by the P&C department in consultation with the concerned function. The company will endeavour to provide course materials meant for induction and training in accessible formats on request.
12. If required, Pre-promotion training shall be conducted for the PwD employee.
13. Employees with disability will be offered a change in base location as part of talent development or promotion depending on their personal situation with respect to adequate support, infrastructure and family presence.

Leave

Differently Abled employees shall be governed by rules of leave as is applicable in the company.

Special Leave may be provided on submission of necessary medical documents. The special leave can be extended on need basis and is subject to approval from Head of People Function.

All other policies of the company including disciplinary proceedings as applicable to other employees shall apply to the Differently Abled employees as well.

Grievance Handling Procedure

- a) Any employee with disability having grievance regarding discrimination on the grounds of disability can approach the Liaison Officer in writing for redressal of the grievances.
- b) On receipt of the grievance, the Liaison Officer / Head of People Function shall take necessary steps to look into the matter and redress the grievance, if found genuine.
- c) The grievance redressal officer shall maintain a register of complaints and every complaint shall be enquired within two weeks of its registration. A Grievance Redressal Mechanism for addressing the matters related to the employment of persons with disabilities is available.

- d) If the aggrieved person is not satisfied with the action taken on his / her complaint, he / she may approach the higher authorities as per the Act.
- e) All Reporting Authorities are responsible to ensure that principles of equal opportunity are applied at all times and that all procedures and practices are free of discrimination.
- f) All staff are obliged to follow legal guidelines and equal opportunity employer principles. In cases when these rules are violated, and the issue is not resolved they can report to respective People Business Partner.
- g) The employee who has suffered the discrimination will be protected against harassment and victimization.

Liaison Officer / Head of People Function

Disciplinary Committee SPOC will act as grievance redressal Officer and will be available on:

Email: Peopleculturecommunication@universalsampo.com;

Contact: 022 69979900

Address: 8th Floor, Westin Commerz,

International Business Park, Oberoi Garden City,

Off Western Express Highway, Goregaon East,

Mumbai 400063

Responsibility

- a) Management and every member of the company is responsible to give effect to this policy in letter and spirit
- b) The People Function has the functional responsibility of assuring compliance with company policy.
- c) Any employee who violates this Policy, or in any manner discriminates with any person with disability or renders any harassment to such a person shall be dealt with under the company's Code of Conduct.
- d) The People Function is accountable to ensure adherence to this policy.

Communication of Policy

A copy of the EOP is available at HRMS Portal and offices of Universal Sampo General Insurance. In addition, the Policy will be registered with the relevant authorities.

Maintenance of Records:

A. USGI shall maintain records in electronic form containing the following particulars:

- (i) The number of persons with disabilities who are employed and the date when they are employed;
- (ii) The name, gender and address of persons with disabilities;
- (iii) The nature of disability of such persons.
- (iv) The nature of work being rendered by such employed person with disability; and
- (v) The kind of facilities being provided of such persons with disabilities.

B. USGI shall produce for inspection on demand records maintained under the Act/Rules, to the authorities and shall supply such information which may be required for the purpose of ascertaining whether the provisions have been complied with.

Review & Revision

This policy shall be in force for a period of three years from the date of approval of the policy by the relevant authority and remain valid subject to any guidelines issued by Government of India and other regulatory bodies from time to time.

USGI reserves the right to amend, modify and interpret appropriately any or all clauses mentioned above depending upon market practices, business exigencies or compliance with relevant statutory guidelines.

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