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| FY 23-25 | <b><u>'EQUAL EMPLOYMENT OPPORTUNITY AND ANTI DISCRIMINATION POLICY'</u></b> | <b>Effective Date:</b><br>01.12.2023 | <b>Next Review:</b><br>31.11.2025 |
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Indian constitution encapsulates social safeguard measures for citizens of India and Halonix is committed to be an Equal opportunity employer and that there is no discrimination in the organization on any grounds. Halonix Technologies provides equal employment opportunities, without any discrimination on the grounds of gender, age, color, disability, marital status, caste, race, religion and sexual orientation. The company also gives right to an employee or prospective job applicant to refuse divulging information about his/her gender. This policy also covers HIV prevention and control act 2017 and Transgender Protection Act 2019. Halonix is committed to comply with all rules around the same.

### 1. Policy Framework

- This policy is about respecting differences and diversity and ensuring that all are respected at all times
- Company will not tolerate harassment or behavior that is discriminatory or that victimizes any individual or group at workplace
- If an employee feels he or she is being subjected to discrimination, harassment, bullying or victimization he or she can follow the complaints process and procedure.
- There would not be any situation where an opportunity is denied to persons with disabilities, merely on the grounds of disability
- All employment decision in Halonix is based on business needs, job requirements and individual qualification only. Development and promotional activities will be based on performance, ability and potential and will be consistent with the needs of business
- All terms of employment, benefits, facilities, and services will be reviewed from time to time in order to ensure that there is no unlawful direct or indirect discrimination because of one or more of the protected characteristics
- Company will identify posts/vacancies that would be suitable for disabled persons and make provision for required infrastructural facilities even if it means modification of structure to accommodate people
- This policy is consistently applied throughout the period of employment of the individual right from the recruitment process to separation
- This policy is subject to applicable state and central government regulations and merit of the individual
- Any employee facing grievances relating to violation of the Transgender Person (Protection of Rights) Act 2019 can register their complaints to the complaints officer Ms. Rashi Agarwal, CHRO at [rashi.agarwal@halonix.co.in](mailto:rashi.agarwal@halonix.co.in)

### 2. COMPLAINTS TO HIV (PREVENTION AND CONTROL) ACT, 2017

Halonix is committed to prevention and control of HIV and hence will comply with the HIV act 2017 and will follow the following:

- Halonix will adopt data protection measures in accordance with the guidelines to ensure that information about HIV positive employee is protected from disclosure as per the Act
- There would be no denial or discontinuation of services, discrimination or unfair treatment of any employee.
- To ensure compliance to the act Halonix has appointed the CHRO of the organization as the complaints officer who shall be responsible for disposing off any complaint arising out of non-compliance of the act. Employee have a right to complaint to the complaints officer directly of any discrimination or unfair treatment arising out of his condition




**3. Grievance handling**

All supervisors and managers are responsible to ensure that policies of equal opportunity are applied at all times and that all procedures and practices are free of discrimination. Managers and supervisors have the additional responsibility to take reasonable steps to resolve complaints that are brought to their attention and to maintain confidentiality as far as practicable. All staff have the responsibility to comply with this policy obliged to follow legal guidelines and equal opportunity employer principles.

Any employee who violates this policy or in any manner discriminates with any person with disability or renders harassment to such persons shall be dealt with under code of conduct policy of the company. Employee have a right to raise issue with the designated complaints officer, Rashi Agarwal, CHRO at [rashi.agarwal@halonix.co.in](mailto:rashi.agarwal@halonix.co.in)

The above "Equal Opportunity Policy" will come into force w.e.f. 01.12.2023.



**Rashi Agarwal**  
CHRO



**Rakesh Zutshi**  
Managing Director