

# **Equal Opportunity Policy (“EOP”)**

**The Rights of Persons with Disabilities Act, 2016 (“RPWD Act”)**

**and**

**Transgender Persons (Protection of Rights) Act, 2019 (“TPPR Act”)**

**and**

**(Rules made thereunder)**

## 1. Preamble & Overview

We at SRF Limited (“We” or “SRF”) value inclusion & Diversity and are hence committed to offer equal opportunities. We shall not discriminate against any applicant for employment or any employee for promotion, training or any career opportunity or compensation based on nationality, race, religion, caste, gender identity/expression, sexual orientation, disability, age, marital status, body shape or any other personal characteristic or status.

We constantly strive to ensure that our workforce is representative of all sections of the society. We believe that, by doing so, we would be better equipped to develop and deliver inclusive growth to all the employees of the organization along with achieving business excellence.

## 2. Scope

The EOP covers job applicants, apprentices, contract workers, full-time/part-time employees, consultants, interns/trainees, including temporary employees of any nationality, race, colour, religion, caste, gender, sexual orientation, disability, age, marital status or any other personal characteristic or status.

This EOP includes Persons with Disability and Transgender Person.

## 3. Definitions

- a. **Discrimination:** Discrimination in relation to disability, means any distinction, exclusion, restriction on the basis of disability which is the purpose or effect of impairing or nullifying the recognition, enjoyment or exercise on an equal basis with others of all human rights and fundamental freedom in the political, economic, social, cultural, civil or any other field and includes all forms of discrimination and denial of reasonable accommodation.
- b. **Person with Disability:** means a person with long term physical, mental, intellectual or sensory impairment which, in interaction with barriers, hinders their full and effective participation in society equally with others.
- c. **Reasonable accommodation:** means necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden in a particular case, to ensure to persons with disabilities the enjoyment or exercise of rights equally with others.
- d. **Specified Disability:** means and covers all the disabilities as specified in the Schedule of the RPWD Act.
- e. **Transgender Person:** means as defined in TPPR Act.

- f. **Employee:** a Person with Disability who is working for the Company in their entire capacity, whether permanently, periodically, or on a contract basis.
- g. **Liaison Officer:** An employee designated to facilitate the recruitment of Persons with Disabilities, ensure provision of requisite facilities and workplace support, and receive and address complaints related to the Rights of Persons with Disabilities (RPwD) Act and the Transgender Persons (Protection of Rights) Act (TPPR Act).
- h. **Certificate:** a certificate with Disability issued by a medical authority or any other notified competent authority or Certificate of Identity issued by District Magistrate.

#### **4. EOP Statement**

At SRF, we are committed to providing a safe working environment and to ensuring that no transgender person or disable person is/are discriminated against in any manner, including in relation to employment, recruitment, employment benefits, promotion and other related aspects.

Our decisions on employment, career progression, training or any other benefits are solely based on merit. Any information shared by employee on their gender and/or sexual orientation would remain confidential.

#### **5. Facilities and Amenities**

- **Physical Infrastructure:** SRF aims to ensure that our physical infrastructure (washroom, building, canteen, ramps, furniture's, facilities etc.) adhere to the accessibility standards prescribed by the Government.  
Any employee facing issues should report to the SRF administration team at their location or write to the Liaison Officer.
- **Digital Infrastructure:** SRF endeavours to ensure that all our documents, communication and information technology systems adhere to the accessibility standards prescribed by the Government. We shall always ensure that only accessible technologies are procured.  
Any employee facing issues should report to the SRF IT team at their location or write to the Liaison Officer.

#### **6. List of position identified for Person with Disability**

At SRF, recruitment decisions are based solely on an individual's competency and suitability for the role. Candidates are assessed on their skills, experience, and ability to perform the essential job responsibilities, with or without reasonable accommodation. The evaluation process focuses on aligning individual capabilities with role requirements, ensuring that all hiring decisions are merit-based and equitable.

## **7. Recruitment & Selection Process**

- At SRF, hiring is purely based on merit and the candidates are evaluated based upon their skills and competence. Applicants can contact our Human Resources (HR) team for specific assistance with respect to suitable positions in compliance with applicable regulations.
- Wherever possible, vacancies will be advertised internally and externally.
- Wherever applicable, vacancy advertisements will include an appropriate short statement on equal opportunities for people with disabilities and transgender persons.
- Selection criteria (Job description and employee satisfaction) will be kept under constant review to ensure that they are non-discriminatory and that they relate purely to skills needed for the job and nothing else.

Employees are requested to report the existence of a disability or certificate of identity issued by the concerned authority to the recruiting officer at the time of joining the organization, in order to ensure protection of their rights under this EOP.

## **8. Training and Career Development**

SRF 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, scribe, etc. shall be placed at least one week prior to the scheduled date of commencement of induction/training.

## **9. Reasonable Accommodation**

SRF will make reasonable accommodation, whenever necessary, for qualified employees or job applicants who have disabilities, as per RPWD Act. Such accommodation will be provided:

- to ensure equal opportunity in the application and selection process,
- to enable an employee with a disability to perform the essential functions of a job, and
- to enable an employee with a disability and transgender persons to enjoy the same benefits and privileges of employment as non-disabled employees.

## **10. Employee Engagement and Social Inclusion**

All social events, engagement activities and work meetings at SRF will be inclusive and, as far as possible conducted at accessible venues and/or through suitable digital modes. As far as possible, reasonable accommodation will be made available to employees with disabilities to enable their full and effective participation.

There shall be no discrimination or exclusion, as far as possible, from social events, engagement activities or any other activities that are made available to other employees.

## 11. Maintenance of Records

SRF understands and respects that sharing information about one's disability/gender identity is a personal preference.

- The "Person with Disability", "Person with Benchmark Disability" and "Disability having higher support needs" defined under RPWD Act will be asked to fill the voluntary disability self-identification Form in order to give information regarding any disability that they may have.
- SRF will collect and maintain data regarding employees with disabilities in relation to their employment, facilities provided and other necessary information as per The RPWD Act.
- Employees are also requested to report disabilities acquired after joining SRF or in case of ceasing of a disability.
- An employee can edit the information at any time during their tenure. An employee who acquires disability can also edit and update the form.
- SRF respects the privacy of every individual and ensures utmost confidentiality of information /concerns in relation to disability /sexuality/gender identity or any other personal information shared with it by its employees (or potential candidates). However, if the disclosure is mandated under law, then any such disclosure will be handled with utmost confidentiality and in accordance with applicable laws.

## 12. Grievance Redressal

SRF will follow the same procedure for inquiring and investigating the complaints or concerns raised by employees with disability as for other employees.

For grievance, employees can write to Liaison Officer. For all complaints confidentiality of the Complainant will be respected, keeping in mind the sensitivity of the subject matter.

### Liaison Officer:

As per mandate of the RPWD Act, SRF has appointed **Mr. Mohd Aqib, Vice President-CHR**, as "Liaison Officer" who will be responsible for providing the requisite support needed to realise the goals of an inclusive workplace and reasonable accommodation.

The Liaison Officer will be responsible for:

- Implementing the action plan for making the workplace and IT systems accessible for persons with disabilities by liaising with the various businesses within SRF.
- Ensuring that all employees are aware of the Equal Opportunity Policy and know their duties and rights in relation to the EOP.
- To Proactively work towards the prevention of discrimination or harassment against persons with disabilities across all stages of engagement, including employee, apprentices, trainees, interns, contract workers and candidates.

- Investigating and resolving the cases of complaints and grievances received from Person with Disabilities and such other trainees, candidates, interns and contract workers.

All employees have the responsibility to comply with the Equal Opportunity Policy. Managers and team members need to monitor the work environment to ensure that it is free from discrimination and harassment and encourages inclusion and respect for others.

  
-27/04/2026  
**Geeta Jadhav**  
**President & CHRO**  
**SRF Limited**