

 <small>Powered by Passion</small>	SPARK MINDA GROUP	Document No.	MSG-HR-386
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1.0.0 Purpose / Objective

Spark Minda is committed to being an equal opportunity employer by providing a safe, flexible and respectful environment for its staff and clients free from all forms of discrimination, intimidation, exploitation and harassment.

We recruit competent and motivated people who respect our values, provide equal opportunities for their development and advancement, protect their privacy and do not tolerate any form of harassment or discrimination. Therefore, employees must not discriminate on the basis of origin, nationality, religion, race, gender, age or sexual orientation, or engage in any kind of verbal or physical harassment based on any of the above or any other reason.

2.0.0 Scope

This Equal Opportunity Employer Policy applies to all prospective or current employees of the company, as well as contractors and visitors, who are vulnerable to discriminatory treatment due to certain individual characteristics.

3.0.0 Applicability

Unless otherwise stated, this policy is applicable to all units/companies of Spark Minda Group.

4.0.0 Group's Approach and Practices

The aim of Spark Minda is to encourage healthy and conducive working environment that should be free from all sorts of discrimination on the grounds of age, color, disability, origin, nationality, religion, race, gender, or sexual orientation and will not engage in any kind of verbal or physical harassment based on any of the above or any other reason.

In furtherance of these objectives, the companies/units will;

4.1.0 Equal opportunity for Persons with Disabilities

In accordance with the provisions of the Rights of Persons disabilities Act, 2016 and rules, it is company's policy to ensure that the work environment is free from any discrimination against persons disabilities.

The company/units will ensure:

- A. Appropriate facilities and amenities are provided to the person with the disabilities so that roles and responsibilities can be delivered.
- B. Units HR will oversee the provision of required facilities/amenities including process of recruitment for person with disabilities.
- C. Grievance Redressal mechanism is available for addressing the matters related employment of the employment of person with disabilities.

4.2.0 Diverse Workforce

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Building the pool of potential candidate with qualifications, diverse backgrounds, while retaining individual merit and achievements as prime criterion for all staffing decisions

4.3.0 Terms of Employment

All employment to be based on merit and achievements not factors unrelated to person's ability to do the job.

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 protected characteristics.

4.4.0 Equal Pay and Equality of Terms

Spark Minda is committed to equal pay and equality of terms in employment.

It believes that all its employees should receive equal pay where they are carrying out like work, work rated as equivalent or work of equal value. In order to achieve this, the company/units will endeavor to maintain a pay system that is transparent, free from bias and based on objective criteria.

The below headlines emphasize the significant matters adopted by Spark Minda to ensure human rights and provide favorable work conditions.

4.5.0 Employee Career Road Map

Employee development plan and promotion opportunities will be based on performance, abilities and potential and will be consistent with the needs of the business

4.6.0 Bullying and Intimidation

We promote a harmonious working environment in which our employees will be treated with dignity and respect. We have a zero-tolerance policy towards bullying and harassment.

4.7.0 Commitment to Diversity and Inclusion

We are committed to strengthening diversity and inclusion at the workplace through an enabling environment, supportive work life policies for employees and a culture that welcomes differences and creates a sense of belonging. We strive to create a work environment where all employees can develop and grow to achieve their full potential. We are an equal opportunity employer and are committed to maintaining respect and dignity for all.

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5.0.0 Roles and Responsibilities

- 5.1.0 Employee Responsibilities to comply with this policy and all applicable laws and regulations. Compliance is required whenever an employee is acting in their capacity as a representative of the Company.
- 5.2.0 Managers and supervisors have additional responsibilities to take reasonable steps to resolve complaints that are brought to their attention and to maintain confidentiality as far as practicable.
- 5.3.0 Human Resources representatives have additional responsibilities to provide advice and address grievances relating to the employment of persons with disabilities and/or any other complaints regarding discrimination in any other form against any job applicant/employee.

6.0.0 Grievance Procedure

Equal Opportunity policy is made available to stakeholders internally and externally. We encourage our stakeholders to report any concern, violations or complaints in this regard to the implementation or violation of policy to;

Web-based Portal- <https://sparkminda.com/>

E-mail- Grievances@mindacorporation.com

Mailing Address:

GCHRO
 Spark Minda Corporate Office
 D-6-11. Sector 59, Noida
 Uttar Pradesh-201301, India

6.1.0 Procedure of action to be taken on the complaint received:

- 6.1.1 Complaint to be shared with Group Chief HRO.
- 6.1.2 Head HR will nominate a person or a group of people who will investigate the complaint thoroughly.
- 6.1.3 Upon completion of the investigation, the Nominated person/team will present a final report to the cross-functional committee.
- 6.1.4 The Committee* will review the report and provide recommendations and actions to be taken.
- 6.1.5 Based on the Committee's decision, appropriate action will be taken by the GCHRO.

***Committee consists of Head Group IR, Respective Business/Business Vertical HR Head and Business/Business Vertical COO.**

7.0.0 Special Provisions

Any deviation from policy shall be approved by GCHRO and GCEO.

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8.0.0 Entirety

This **Equal Opportunity Policy** replaces all prior versions, policies and templates related to **Equal Opportunity**, rendering them null and void.

9.0.0 Confidentiality Level

The document is the property of Spark Minda Group and is intended for sharing with all employees.

10.0.0 Training and Awareness

The HR team will assume responsibility for training and promoting awareness of this Policy.

List of Functional Committee Members:

Name of Members	Designation
Neeraj Tewatia	Group IR Head
Dharmendra Saxena	Operations Head – BV I
Ajay Singhroha	Group CHRO
Sanjiv Kumar Jalan	Head CAG

Revision History

Rev No	Description	Date
R00	Original Document	01 March 2023

Approval

Responsibility	Name	Designation	Signature
Prepared by	Sandeep Yadav	GM - Corporate HR	
Reviewed by	Ajay Singhroha	GCHRO	
Validated by	Sanjiv Kumar Jalan	Head - Corporate Audit & Governance	
Approved by	Ashok Minda	GCEO	

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