



PRIVI SPECIALITY CHEMICALS LIMITED

(Formerly known as Fairchem Speciality Limited)

(CIN: L15140MH1985PLC286828)

Regd Off: Privi House, A-71, TTC, Near Koparkhairne Railway Station, Navi Mumbai -400710

ANTI-DISCRIMINATION AND EQUAL OPPORTUNITY POLICY

Approved by Board on Wednesday, August 10, 2022

ANTI-DISCRIMINATION AND EQUAL OPPORTUNITY POLICY

Introduction

Indian constitution encapsulates social safeguard measures for all citizens of India in Article 15 and Article 16. Article 15 mandates prohibition of discrimination on grounds of religion, race, caste, sex or place of birth.

Article 16 mandates equal opportunity in matters of public employment. Article 16(2) further states that no citizen shall on grounds only of religion, race, caste, sex, descent, place of birth, residence or any of them, be ineligible for, or discriminated against in respect of, any employment or office under the State.

This Non-Discrimination and Equal Opportunities Policy (“Policy”) states the internal policy of the PRIVI University with regard to non-discrimination at the workplace and equal opportunities during recruitment.

This Policy is internal to PRIVI and is meant to provide a safe, diverse and comfortable workplace at PRIVI. This Policy is without prejudice to any anti-discrimination provisions of applicable law including, but not restricted to, the provisions of:

- Article 17 of the Constitution of India;
- the Protection of Civil Rights Act, 1955,
- the Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, 1989;
- the Sexual Harassment of Women at the Workplace (Prevention, Prohibition and Redressal) Act, 2013;
- Sections 354 and 509 of the Indian Penal Code, 1860; and,
- the Persons with Disabilities (Equal Opportunities, Protection of Rights and Full Participation) Act, 1995.

Policy Statement

Privi is committed to promoting and strengthening diversity and inclusion at its workplace through an enabling environment and aims to create a harmonious workplace through supportive work life policies for employees and a culture that creates a sense of belonging such that all employees can achieve their full potential. We believe in providing equal opportunity to persons from all sections of the society including persons with disabilities. We are committed to maintaining respect and dignity for all.

Policy Objectives:

Privi is committed to providing equal opportunities in employment and creating an inclusive work environment. We endeavor to –

1. Provide equal and fair opportunities for employment to all qualified applicants and the Company's employees / potential employees do not suffer unfair discrimination in the workplace.
2. Individuals and groups within the PRIVI work in an environment where all decisions are free of discrimination, where they have equal opportunity based on relevant abilities and merit.
3. Employees are encouraged to take positive action towards promoting equal opportunity throughout the organization.
4. Personnel actions, such as compensation, benefits, transfers, layoffs, company-sponsored training programs, and social and recreational programs, will be administered on a non-discriminatory basis.
5. adhere to applicable law pertaining to equal employment opportunities and fair employment practices; and
6. inform staff of certain behaviour that is unacceptable, and measures that the Company may take for deviant behaviour towards employees.

Non-Discrimination

We shall not discriminate directly or indirectly against any employee or job applicant on any grounds including on the grounds of age, color, physical ability, ethnic origin, nationality, religion, gender, family status, marital status, pre-natal status, gender re-assignment, or sexual orientation

We will make reasonable accommodation*, whenever necessary, for qualified employees or job applicants who have disabilities.

**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.

Equal Opportunities:

1. PRIVI provides equal opportunities to all employees and to all eligible applicants for employment in our company. We do not unfairly discriminate on any ground, including race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability or any other category protected by applicable law.
2. When recruiting, developing and promoting our employees, our decisions will be based solely on performance, merit, competence and potential.
3. We shall have fair, transparent and clear employee policies which promote diversity and equality, in accordance with applicable law and other provisions of this Code. These policies shall provide for clear terms of employment, training, development and performance management.
4. Any person who believes himself or herself to have been subjected to adverse discrimination, or impermissible positive discrimination, on the basis of the

Discrimination Characteristics is encouraged to bring the matter to the attention of the Internal Complaint Committee at the earliest practical opportunity.

Dignity and respect

The Senior Management at PRIVI shall be responsible for creating a conducive work environment built on tolerance, understanding, mutual cooperation and respect for individual privacy.

Everyone in our work environment must be treated with dignity and respect. We do not tolerate any form of harassment, whether sexual, physical, verbal or psychological.

We respect our employees' right to privacy. We have no concern with their conduct outside our work environment, unless such conduct impairs their work performance, creates conflicts of interest or adversely affects our reputation or business interests.

We have necessary disciplinary procedures, which provides for an employee's right to be heard and conduct of a fair enquiry.

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.

Interpretation & Guidance

In the event that any additional guidance and/or further interpretation is required, please contact the Human Resources representative of your location.

Review Timelines

The policy will be reviewed basis changes in legal and regulatory guidelines.

Communication of the Policy

The Policy is available on the Website of the Company www.privi.com. It is also included in the HR Manual which is available on the intranet for all employees.