

Equal Employment Opportunity Policy

Purpose:

To ensure equal opportunity in all aspects of employment while creating and maintaining a non-discriminatory and inclusive work environment which ensures a robust career growth path for people with disabilities and for those who acquire disability during their employment tenure.

Scope:

This policy is applicable to all employees of ValueFirst and its group companies/branch offices in India.

Definitions:

- “Person with disability” means a person with long term physical, mental, intellectual, or sensory impairment which, in interaction with barriers, hinders his full and effective participation in society equally with others
- “Person with benchmark disability” means a person with not less than forty per cent of a specified disability where specified disability has not been defined in measurable terms and includes a person with disability where specified disability has been defined in measurable terms, as certified by the certifying authority
- “High support” means an intensive support, physical, psychological and otherwise, which may be required by a person with benchmark disability for daily activities, to take independent and informed decision to access facilities and participating in all areas of life including education, employment, family and community life and treatment and therapy
- “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 freedoms in the political, economic, social, cultural, civil or any other field and includes all forms of discrimination and denial of reasonable accommodation
- “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.

Selection & Recruitment:

All positions are open for people with all types of disabilities. The hiring is purely based on merit and the candidates are evaluated based upon their skills and competence. Flexibility and accommodations will be provided to persons with disabilities on an individual basis. All vacancies will be advertised internally and externally through the standard methods used by the Recruitment team.

Liaison Officer:

Vinod Rai (vinod.rai@vfirst.com) is the appointed Liaison Officer who will be responsible for taking initiative and providing the requisite support needed to realize the goals of an inclusive and accessible workplace and reasonable accommodation.

www.vfirst.com

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Email: info@vfirst.com

CIN U64202DL2003PTC122688

Registered Office:

G 270, G Block, Phase- 6

Aya Nagar, New Delhi

110047, Delhi, India

ValueFirst Digital Media Pvt Ltd

B-18, Infocity 1

Sector 34, Gurugram 122001

Haryana, India

The Liaison Officer is responsible for:

- Implementing the action plan for making the workplace and IT systems accessible for people with disabilities by liaising with the various departments in the organization
- Ensuring that all employees are aware of the Equal Opportunity Policy and know their duties and rights in relation to the Equal Employment Opportunity policy
- Developing proactive strategies to prevent discrimination and harassment
- The Liaison Officer will share the quarterly progress report with the HR Head who would then present the progress report to the CEO/MD

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.

All employees are encouraged to report any incidents of violation of this policy and Managers should act promptly when concerns arise, or complaints are made.

Maintenance of Records:

Liaison Officer 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 2016. An employee can declare their disability via email to the Liaison Officer at any time during her/his tenure. There will be no penalties imposed because she/he did not share information regarding her/his disability earlier. An employee who acquires disability can also declare it via email to the Liaison Officer. The information that an employee shares about her/his disability will be kept confidential.

Exceptions to the confidentiality clause:

- Managers/HR Team may be given information about an employee's disability for allowing/providing any accommodations
- Security personnel may be given information about an employee's disability so as to facilitate obtaining any necessary support during an emergency
- Government officials who are investigating the compliance with The RPWD Act 2016 may be given information about an employee's disability.

Grievance Redressal:

Employees with disability have the right to file a complaint concerning any discrimination with the Liaison Officer who then reports to the HR Head and CEO/MD. Any policy violation i.e. when any person with disability is discriminated against or not provided reasonable accommodation or denied access to any company facility, will be regarded as a grievance.

The Liaison Officer, HR Head & CEO/MD will address the Grievance and conduct the Enquiry.

On investigation, if the employee against whom the complaint has been made is found guilty of discriminatory behavior, she/he will be subjected to disciplinary actions. Possible action taken against the employee may include a reprimand, detraction of benefits for a definite or indefinite time, demotion, denial of promotion and suspension or termination for more serious offences. Involuntary or indirect discrimination will be resolved through training, counselling and suitable modification of procedures when required to ensure fair treatment.

Disability Leave:

An employee's request for extra leave, for a reason related to her/his disability, will be treated as a request for reasonable accommodation and will be evaluated accordingly.

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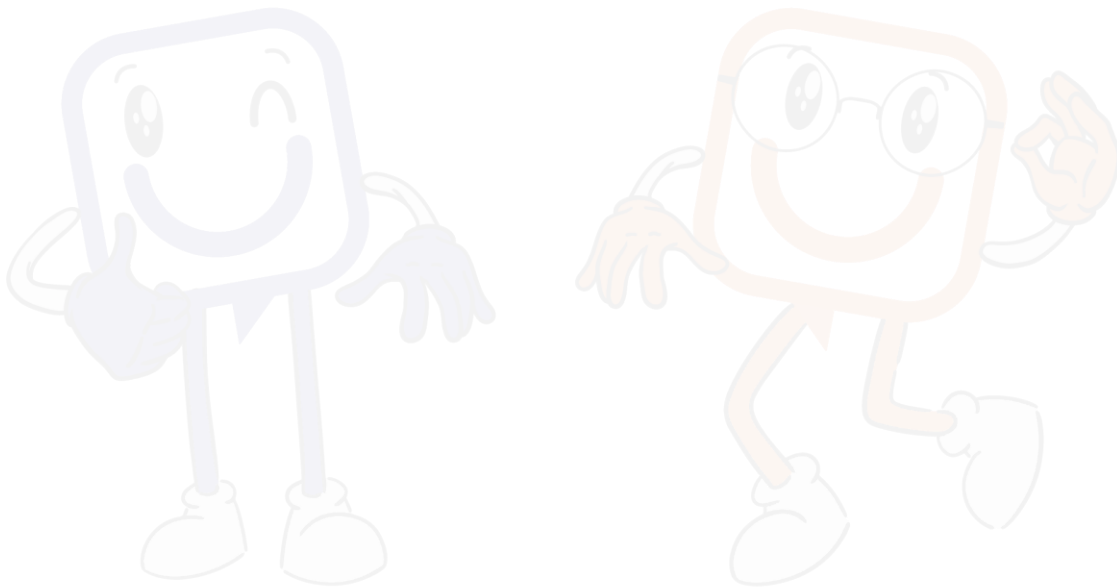
Haryana, India

Physical Accommodation:

ValueFirst aims to ensure that our physical infrastructure (buildings, furniture, facilities and services in the building and transportation) adheres to the accessibility standards as prescribed by the Government of India. Any new facility that is built or renovated or leased or rented will be evaluated for compliance with accessibility standards. Any employee facing accessibility issues can report to the facilities team at their location or write to the Liaison Officer.

Modification and Review of the Policy:

ValueFirst reserves the right to modify or review this policy, so as to comply with applicable legal requirements or otherwise with a view to revise the positions of this policy from time to time. Any such changes will be notified by ValueFirst to its employees from time to time.



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