Equal Employment Opportunity for Persons with Disabilities (PwD)

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1. Introduction, Objective and Applicability

Vendavo Technology Private Limited ("**Company**", "**we**" or "**us**") is committed to diversity, equal opportunity in employment, providing equal treatment to all employees and creating an inclusive workplace and work culture in which all employees are treated with respect and dignity.

The objective of this policy is to set out the Company's approach in relation to persons with disabilities and is made pursuant to the Rights of Persons with Disabilities Act, 2016 and the rules thereunder ("**RPWD Act**").

This policy applies to all persons with disabilities, such as job candidates, employees, directors, officers, contractors and consultants, and also covers those employees who acquire a disability during the course of their employment with the Company.

2. This Policy covers the following in relation to persons with disabilities

- a. Meaning of certain terms.
- b. Prohibition of discrimination.
- c. Facilities and amenities.
- d. Suitable posts and vacancies.
- e. Recruitment, training and special leave.
- f. Reasonable accommodations.
- g. Liaison Officer.
- h. Maintenance of records.
- i. Grievance redressal.
- j. General terms.

3. Meaning of certain terms

The RPWD Act (as may be amended from time to time) defines persons with disabilities in the following manner:

"**Person with disability (PwD)**" 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 a specified disability has not been defined in measurable terms and includes a person with disability where a specified disability has been defined in measurable terms, as certified by the certifying authority.

4. Prohibition of discrimination

The Company prohibits all forms of discrimination at the workplace, and the Company's approach in this regard is further described in the Employee Guidebook, which is applicable to all employees of the Company.

5. Facilities and amenities

The Company strives to provide facilities, amenities and other arrangements which are accessible to persons with disabilities and enables them to effectively discharge their duties for the Company. The Company also endeavors to ensure that the Company's



facilities and physical infrastructure, and documents, communication and information technology systems adhere to applicable standards for accessibility.

Since everyone at Vendavo India is working remotely, the company ensures that all digital communication tools are accessible (e.g. Microsoft Teams using captions).

It may not be possible for the Company to offer some or all such facilities and amenities in some cases, or where the Company has no direct control or supervision over such facilities and amenities such as (without limitation) in the following cases – (a) where the Company operates from leased/ co-working premises; (b) where an employee works from premises which are not owned, controlled or operated by the Company e.g. client's premises; or (c) where an employee works from home.

6. Application to suitable posts and vacancies as PwD

Persons with disabilities (PwD) can apply for all vacancies which the Company may publish from time to time and we encourage persons with disabilities to apply. The Company will assess all applicants solely based on merit, qualifications, skills, competence, abilities and the Company's policies. The Company will try its best to provide persons with disabilities with suitable flexibility and accommodation that may be required so that she/he may be assessed fairly during the evaluation process.

The Company's decision on the suitability of an applicant for any vacancy shall be final and we may also revise or withdraw any vacancy at any time in our sole discretion.

The Company shall endeavour to identify posts which it may consider suitable for persons with disabilities and shall publish details of such posts and other relevant information on its website, from time to time.

Any disability acquired by an employee during the course of her/his employment with the Company shall not prejudice her/his position in the Company and the Company shall have the right to perform an assessment of the suitability and ability of such an employee to continue in the position and with the responsibilities assigned to her/him before acquiring the disability, including by consulting a doctor (where necessary). If the Company, in its reasonable assessment and judgement, concludes that it is necessary that such employee's position and responsibilities in the Company must be changed, then the Company shall use all reasonable efforts to offer such employee suitable responsibilities without diminishing her/his position.

7. Recruitment, training and special leave

Recruitment -

The Company follows industry standard recruitment processes, which assess applicants based on merit and qualifications and also includes some of the following steps:

- a. Advertising vacancies within the Company and/or to the public.
- b. Providing a prescriptive description of the job and its responsibilities.
- c. Conducting written assessments, interviews, group discussions and other tests.
- d. Performing background checks and other verifications.

Wherever possible, the Company will consider reasonable adjustments during the recruitment process to accommodate the requests and needs of applications from persons with disabilities. Application forms can be made available in alternate formats upon request from the Company.

Training –

Employees will be required to undergo training assigned by the Company, and such training requirements shall be based on the Company's assessment of the skills and training needs of each employee. Training requirements will be made known by email or on the Company's intranet.

The Company will endeavor to assign special training to employees with disabilities wherever possible, and employees with disabilities can make requests for specialist training or training materials in accessible formats to the Liaison Officer (as identified here below), and the Company will consider all such requests, and approve the requests wherever feasible, in the opinion of the Company. The Company holds the discretion to approve or deny such requests.

Special leave -

An employee may request extra leave (in addition to her/his leave entitlements under the Company's Leave Policy) for reasons related to her/his disability. This will be treated as a request for reasonable accommodation and will be considered accordingly by the Company. The procedure for availing leaves is specified in the Company's Leave Policy. The employee must discuss extra leave with her/his manager in good time (preferably within 2 weeks of the actual leave) before applying for leave. Any extra leave is always subject to approval by the employee's manager and may not be approved. Any extra leave, if granted to an employee, will be treated as leave without pay unless a different arrangement is agreed by the Company in writing.

8. Reasonable accommodations

The Company will endeavour to make reasonable accommodations, whenever requested and reasonably possible, for qualified employees or job applicants with disabilities. Such accommodation would be considered by the Company with the aim to:

- a. offer equal opportunity in the application and selection process;
- b. enable an employee with a disability to perform her/his job effectively;
- c. enable an employee with a disability to avail the same benefits and arrangements of employment as non-disabled employees; and
- d. help an employee with a disability to overcome disadvantage arising from such disability.

Examples of reasonable accommodations may include acquiring or modifying equipment or devices, modifying assessment and training materials, modifying work schedules, reassignment to a vacant position and conducting the Company's social events at accessible venues.

The candidate can submit a formal request to the People & Culture department and provide relevant medical documentation (only if required and in compliance with privacy laws). People & Culture Team will review the request and discuss feasible accommodations with the employee and the reporting manager and approve accommodations within a reasonable timeframe.

9. Liaison Officer

The Company has appointed **Sri Deepti Kocherlakota**, **P&C Business Partner India** as the Liaison Officer under this policy. The Liaison Officer can be contacted **skocherlakota@vendavo.com** and will be responsible to operate and manage this policy.

10. Maintenance of records

The Company and its appointed agents collect, store, record, process, modify, handle and/or export information, personal information and sensitive personal information of persons with disabilities for the purpose of (a) recording, monitoring or reporting on the compliance, management and/or implementation of this policy; (b) complying with applicable law; and/or (c) complying with requests from governmental or legal authorities. All such information, personal information and sensitive personal information will be handled and processed in accordance with the Company's Employee Privacy Notice.

11. Grievance Redressal

An employee with disabilities can raise formal grievances concerning any discrimination, denial of any facilities, benefits or arrangements normally provided by the Company or breach of this policy with the Liaison Officer in the first instance who shall in turn report such grievances to the employee's manager. All grievances shall be managed, governed and dealt in accordance with the Company's Grievance Procedure as set out in the Employee Guidebook.

12. General terms

This policy neither constitutes a contract of employment nor does it automatically provide any assurance of employment or continued employment. The Company reserves the right to interpret, revise, vary, delete, suspend and/or withdraw this policy at its sole discretion at any time and without need of any form of consent or agreement from any person. All such changes will be communicated through email, the Company's intranet or in any other manner as we may deem fit.

REVISION HISTORY

Sr No	Version of Process document	Author/ Editor	Created Date	Modifications	Date Reviewed	Reviewed by
1	1.0	Sri Deepti Kocherlakota	24-Feb- 2025	Initial Document	7-Mar-2025	Karolina (P&C), Sian/Arjun (legal)