



TRANSGENDER POLICY

CONTENTS

1. Background.....	2
2. Applicability & Scope.....	2
3. Definitions	2
4. Objective.....	3
5. Policy Statement	3
6. Equal Employment Opportunity	3
7. Names, Pronouns & Corporate Records	3
8. Workplace Conduct & Dress Code.....	4
9. Access to Facilities	4
10. Modifications/Deviations to the Policy	4
11. Limitation and Amendment	4

1. Background

Indian law and corporate governance frameworks recognize the right of every individual to equality, dignity, and non-discrimination. The Hon'ble Supreme Court of India and the Transgender Persons (Protection of Rights) Act, 2019 affirm the rights of transgender persons, including the right to self-identify gender and to be free from discrimination in employment. Further, the Company is guided by the SEBI (LODR) Regulations, 2015 which emphasize respect for human rights, employee well-being, diversity, and inclusion as key elements of responsible business conduct.

In line with these legal and governance obligations, and as part of the Company's commitment to ethical conduct and ESG principles, this policy has been adopted to ensure a safe, inclusive, and respectful workplace for all employees.

2. Applicability & Scope

This policy applies to:

- All permanent, temporary, and contractual employees
- Directors and members of the Board
- Senior management and Key Managerial Personnel
- Consultants, interns, trainees, and agency staff
- Vendors, service providers, and business partners while on Company premises or representing the Company.

3. Definitions

- **“Corporate office”** means Company's office located at 2nd Floor, NRC Arcade, L248, 17th Cross Rd, next to Reliance Digital, Sector 6, HSR Layout, Bengaluru, Karnataka 560102;
- **“Discrimination in relation to gender equality”**, means any distinction, exclusion, restriction on the basis of gender 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;
- **“Discrimination Characteristics”** means discrimination at work place on the basis of religion, race, caste, sex, place of birth, descent, sexual orientation, gender identity, disability, age or any of them;
- **“Policy”** means Transgender Policy;

- **“TPPR Act”** means The Transgender Persons (Protection of Rights) Act, 2019 and The Transgender Persons (Protection of Rights) Rules, 2020 as amended from time to time.
- **“Transgender person”** means a person whose gender does not match with the gender assigned to that person at birth and includes trans-man or trans-woman (whether or not such person has undergone Sex Reassignment Surgery or hormone therapy or laser therapy or such other therapy), person with intersex variations, genderqueer and person having such socio-cultural identities as kinner, hijra, aravani and jogta.

4. Objective

The Company is committed to maintaining a workplace that upholds equality, dignity, human rights, and fair treatment for all individuals. This policy establishes clear standards to ensure that transgender, non-binary, and gender-diverse persons are treated respectfully and are protected from discrimination, harassment, and exclusion.

This policy supports the Company’s:

- Corporate governance obligations
- ESG (Environmental, Social, and Governance) commitments
- Code of Conduct and Ethics
- Human capital management strategy

5. Policy Statement

The Company:

- Prohibits discrimination based on gender identity or expression.
- Respects each individual’s right to self-identify their gender.
- Provides a safe, inclusive, and supportive work environment.
- Ensures compliance with applicable labor, human rights, and securities regulations.

6. Equal Employment Opportunity

The Company shall ensure that no person is disadvantaged in:

- Recruitment, hiring, and onboarding
- Compensation, benefits, and incentives
- Performance evaluation and promotion
- Training, leadership development, and succession planning
- Termination or retirement on the basis of gender identity or expression.

7. Names, Pronouns & Corporate Records

- Employees may use their affirmed name and pronouns in the workplace, irrespective of legal documentation.
- Internal systems (email IDs, badges, directories) will reflect the affirmed name wherever legally permissible.
- Legal names will be used only where required for statutory, payroll, taxation, or regulatory filings.
- All personal data shall be handled in accordance with data protection and privacy laws.

8. Workplace Conduct & Dress Code

- The Company maintains a gender-neutral dress and appearance policy.
- Employees may dress in accordance with their gender identity, subject to safety and professional standards.
- Any form of stereotyping or enforcement of gender norms is prohibited

9. Access to Facilities

- Employees may access restrooms, changing rooms, and other gender-segregated facilities consistent with their gender identity

10. Modifications/Deviations to the Policy

The Board of Directors or the Chairman is authorized to approve any modifications/ deviations to the policy and will be the competent authority for any interpretation regarding the policy. The modifications in the policy, if any, authorized by the Chairman, shall be placed at the ensuing/ next meeting of the Board of Directors for noting/ ratification.

11. Limitation and Amendment

In the event of any conflict between the provisions of this policy and of the Act or Listing Regulations or any other statutory enactments, rules, the provisions of such Act or Listing Regulations or statutory enactments, rules shall prevail over this policy. Any subsequent amendment / modification in the Listing Regulations, Act and/or applicable laws in this regard shall automatically apply to this policy.
