

**Magma HDI General  
Insurance Company Limited**

This document states that Magma HDI General Insurance Co. Ltd. is an Equal Opportunity employer.

**Policy on Equal Opportunity & Non –  
Discrimination**

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Approved By – Board of Directors

Policy Owner – Human Resource  
Department

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& Amit Raheja

<b>Subject:</b> <b>Policy on Equal Opportunity &amp; Non-Discrimination</b>	Original Issue Date: 15-Jul-22	Effective Date: 1-Apr-24
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Base Document	:	United Nations Women Empowerment Principles and Right to Persons with Disabilities Act, 2016; Transgender Persons Act
Initial Document Prepared by	:	Soma Gambhir
Functional aspects checked by	:	Anilkumar Satyavarpu
Governing Guideline/Policy	:	United Nations Women Empowerment Principles and Right to Persons with Disabilities Act, 2016; Transgender Persons Act
Legal aspects checked by	:	Amit Raheja

## Policy on Equal Opportunity and Non-Discrimination

Magma HDI General Insurance Company Limited

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## 1. **Purpose & Policy Statement:**

- 1.1 Magma HDI is an equal opportunity employer. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices.
- 1.2 Magma HDI is committed to provide a safe, diverse, and comfortable Workplace and to maintain progressive work environment. Magma HDI undertakes to comply with all applicable laws with regard to non-discrimination at the Workplace and providing equal opportunities to all our employees and to all eligible applicants for employment in our company.
- 1.3 This Policy on Equal Opportunity and Non-Discrimination ("Policy") states the internal policy of Magma HDI to non-discrimination at the Workplace and equal opportunities during recruitment. The Policy applies to all aspects of the relationship between Magma HDI and its employees, including recruitment, retention, re-entry and promotion of all individuals, training and development, wages, and salary, working conditions, employee benefits and policies, giving due consideration to intersectionality and diverse backgrounds.
- 1.4 This Policy is internal to Magma HDI and is not legally mandated and, therefore, is not judicially enforceable in India. This Policy is without prejudice to any anti-discrimination provisions of applicable laws.
- 1.5 It is the responsibility of all those connected with the Company to comply with this Policy.

## 2. **Scope:**

### 2.1 Non-discrimination

- (a) Magma HDI will not adversely discriminate and prohibits other adverse Discrimination at the Workplace. Magma HDI will neither tolerate nor condone, deviate any adverse discrimination against any person on any of its office premises, whether that person is in its employment or otherwise.
- (b) Any person who believes himself or herself to have been subjected to adverse discrimination on the basis of the Discrimination is encouraged to bring the matter to the attention of the Internal Committee as per the process defined herein below.
- (c) **Rights to Person with Disabilities**  
In accordance with the provisions of the Rights to Persons with Disabilities Act, 2016 and Rules, Magma HDI shall ensure:
- (i) That the work environment is free from any discrimination against persons with disabilities.
  - (ii) That facilities and amenities are provided to the persons with disabilities to enable them to effectively discharge their duties in the establishment.
  - (iii) Suitable post may be defined for persons with disabilities in the establishment.
  - (iv) That the manner of selection of persons with disabilities for various posts, post-recruitment and pre-promotion training, preference in transfer and posting, special leave, preference in allotment of residential accommodation if any, and other facilities.

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- (v) Ensure to have provisions for assistive devices, barrier-free accessibility and other provisions for persons with disabilities.
- (vi) Ensure appointment of liaison officer by the establishment to look after the recruitment of persons with disabilities and provisions of facilities and amenities for such employees.

Provided further, Magma HDI shall also implement all measures for providing a safe working environment and to ensure:

- (i) that no Transgender person is discriminated in any matter relating to employment including, but not limited to, infrastructure adjustments, recruitment, employment benefits, promotion and other related issues;
- (ii) The equal opportunity policy of an establishment shall, inter alias, contain details of-
  - (a) infrastructural facilities (such as unisex toilets), measures put in for safety and security (transportation and guards) and amenities (such as hygiene products) to be provided to the transgender persons so as to enable them to effectively discharge their duties in the establishment.
  - (b) applicability of all rules and regulations of the company regarding service conditions of employees.
  - (c) confidentiality of the gender identity of the employees.
  - (d) complaint of the officers.

Magma HDI commits that no opportunity will be denied to Persons with Disabilities or Transgender persons and there will be no discrimination of any manner.

## 2.2 Equal Opportunities

- (a) Magma HDI is committed to provide equal opportunities to its employment, consultancy or otherwise without regard for the Discrimination. All actions of Magma HDI with regard to its employees, consultants, advisors, interns and staff, including but not limited to those relating to compensation, benefits, transfers, leave, layoffs, training, education, and assistance, will be made without regard for the Discrimination.
- (b) Equal Pay: Magma HDI is an equal opportunity employer and is committed to ensure that all employees, regardless of the Discrimination, receive equal pay for equal value of work as per their relevant experience, age, last salary drawn and compensation philosophy. Magma HDI believes in fairness for all and will follow appropriate processes and procedures to determine value of a role and pay and conditions of employment that are not discriminatory.
- (c) Any person who believes himself or herself to have been subjected to adverse discrimination, or impermissible positive discrimination, on the basis of the Discrimination is encouraged to bring the matter to the attention of the Internal Committee as per the process defined herein below.

## 3. **Key Definitions:**

- (a) **Company:** Magma HDI General Insurance Co. Ltd and its offices across India.
- (b) **Disability:** An individual with a disability is defined as a person who has a physical or mental impairment that

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substantially limits one or more major life activities.

- (c) **Discrimination:** Being treated differently or unfairly because of race, color, religion, sex, gender/genderidentity, nationality, age, physical or mental disability or genetic formation
- (d) **Internal Committee:** Committee members –Deputy CEO. Chief Risk Officer, Head – Legal, Secretarial & CCO, Head – Talent Acquisition, Employee Experience, Branding & Gender diversity.
- (e) **Workplace:** Workplace includes any office, branch, or unit, which is established, owned, or controlled by the Company and includes any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.
- (f) **“Transgender”** 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*.

The definitions are not exhaustive but suggestive and shall have the similar meaning as provided under the governing statute.

#### 4. Objectives:

- 4.1 Magma HDI will make every reasonable effort to ensure that all concerned are familiar with the Policy and are aware that any complaint in violation of the Policy will be investigated and resolved appropriately. This Policy will be communicated to employees, potential employees in job applications and at the time of hiring.
- 4.2 This Policy is applicable to all employees and job applicants, whether related to conduct engaged in by fellow employees or by someone not directly connected to Magma HDI (e.g., an outside vendor, consultant, or customer). It is clarified herein that the conduct prohibited by this Policy is unacceptable in the Workplace and in any work- related setting outside the Workplace, such as during business trips, business meetings and business-related social events.
- 4.3 Any employee who has questions or concerns about this Policy should speak to your human resources department or manager. If you feel that you have been discriminated against, please let your manager or Human Resources Department know as soon as possible.

#### 5. Roles & Responsibilities:

##### 5.1 Chief Human Resource Officer (CHRO):

The CHRO of Magma HDI will be responsible for the dissemination of the Policy.

The Complaint officer (Head - TA, Employee Experience, Branding And Gender Diversity) shall be appointed in this behalf who shall look after the grievances reported as per the statutory

##### 5.2 Managers & Supervisors:

- (i) All people managers must demonstrate equal and inclusive treatment of employees and ensure they show values and behaviors that create an environment in which others feel respected and included.

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- (ii) All people managers must create an environment where employees are engaged in challenging work that matches their talents and increases their skills and where they are recognized for their contributions and achievements.
- (iii) All people managers must give open and honest feedback on performance with the assistance to develop and improve.
- (iv) All people managers are responsible for implementing this Policy within each division/ department/team.
- (v) To support employees in understanding the Policy and questions arising out of the same. In case required direct them to appropriate representatives to resolve queries.
- (vi) To take reasonable steps to resolve complaints that are brought to their attention and to maintain confidentiality as far as practicable.

### **5.3 Human Resources Department:**

- The HR department is responsible for overall compliance and shall maintain personnel records, forms in compliance with applicable laws, Rules and regulations.
- Human Resources representatives have the following additional responsibilities:
  - (a) 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
  - (b) To uphold the value of trust and respect for people with meritoriousness in the advent of opportunities.

### **5.4 Employees:**

- All Magma HDI employees must personify company's value of trust and respect for People and take personal responsibility for treating everyone they encounter with courtesy, respect, and dignity
- All employees to comply with this Policy and all the applicable laws and regulations. Compliance is required whenever an employee is acting in their capacity as a representative of the Company

## **6. Process:**

### **6.1 Communication of the Policy**

**6.2** Policy will be available on HRMS to all employees and on our corporate website. It will also be available at all places in branches and head office.

### **6.3 Internal Employee Training**

Provide trainings to all employees, including managers on non-discrimination and equal opportunity

### **6.4 Interpretation & Guidance**

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

## **7. Operational Guidance**

- 7.1** Every employee is responsible for maintaining a Workplace that is free from unlawful discrimination, or retaliation. Any employee who violates this Policy may be subject to disciplinary action, up to and including termination of employment
- 7.2** Managers are responsible for understanding and communicating this Policy and identifying and addressing potential violations appropriately
- 7.3** All employment-related decisions must be made in compliance with applicable laws prohibiting discrimination in

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employment.

## 8. Confidential Grievance and Resolution Mechanism

- 8.1** At Magma HDI, we are committed to deal with all in equal and inclusive way. The values and standards mentioned as part of the Policy applies to all everyone who works for or on behalf of Magma HDI. Failure to comply with the rules and guidelines mentioned in the Policy may result in disciplinary action, up to and including dismissal or termination of employment, contract, or assignment.
- 8.2** The Internal Committee is committed to fairly investigate every issue brought to their attention and take appropriate action.

## 9. Redressal Mechanism:

- 9.1** If as an employee, you feel you have been treated in a manner that is contrary to this Policy, you should promptly report your concerns to your manager or your Human Resources Business Partner (HRBP)
- 9.2** The concern / complaint will be handled with the applicable Code of Conduct and Disciplinary Rules of the company and would be governed by the decision taken by the Internal Committee of the organization
- 9.3** For any person, who is not employee of the company, can report concerns to the CHRO office
- 9.4** If a party to a complaint does not agree with its resolution, that party can appeal to the CEO of the Company
- 9.5** All such complaints can be written directly to [humanresources@magma-hdi.co.in](mailto:humanresources@magma-hdi.co.in)

## 10. Confidentiality

- 10.1** Magma HDI, is committed to maintain complete confidentiality throughout the investigative process and prohibits retaliation against any individual who reports discrimination or participates in an investigation of such reports.
- 10.2** False and malicious complaints of discrimination or retaliation may be subject of appropriate disciplinary action
- 10.3** All concerns will be addressed, and appropriate corrective action will be taken as necessary.

## 11. Terms & Conditions

- 11.1** Nothing contained in this Policy shall prejudice any right available to any person/employee.
- 11.2** The Company reserves the right to modify and, or review the provisions of this Policy.
- 11.3** If any provision of the Policy is held to be illegal or invalid or amended for any reason, the illegality or invalidity shall not affect the remaining provisions hereof, but such provision shall be fully severable, and the Policy shall be construed and enforced as if the illegal or invalid provision had never been included herein.

## 12. Review Timelines:

- 12.1** The Policy will be reviewed annually or earlier in case of any changes in the applicable guidelines.

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### 13. Change Control Record

Version No.	Change Request by	Memorandum of Change	Approval Date
1.0	Mr. M A Abedin and Ms. Smita Jain	No Change	25.07.2023

Version No.	Change Request by	Memorandum of Change	Approval Date
2.0	Mr. Anilkumar Satyavarpu and Ms. Soma Gambhir	Aligned as per the RPwD Act and Transgender Act	19.07.2024