

## Equal Opportunity Policy

### Preamble

Orchid Pharma Limited (hereinafter referred to as 'Orchid', or 'The Company') is an equal-opportunity employer. accordance with the provisions of the Rights of Persons with Disabilities Act, 2016 ("Act"), it is the purpose of this policy to effectuate these principles and mandates. prohibits discrimination and harassment of any type and affords equal employment opportunities to employees and applicants without regard to race, color, religion, sex, sexual orientation, gender identity or expression, pregnancy, age, national origin, disability status, genetic information, protected veteran status, or any other characteristic protected by law. Orchid aims to be an inclusive employer that provides equal opportunities to persons from all sections of society including Persons with Disabilities (PWD).

### Purpose

This Equal Opportunity Employer Policy applies to all prospective or current employees of the company, as well as contractors and visitors, who are vulnerable to discriminatory treatment due to certain individual characteristics.

### Coverage

The policy of equal employment opportunity (EEO) and anti-discrimination applies to all aspects of the relationship between Orchid Pharma Limited and its employees, including:

- Recruitment.
- Employment.
- Promotion.
- Transfer.
- Training.
- Working conditions.
- Wages and salary administration.
- Employee benefits and application of policies.

The policies and principles of EEO also apply to the selection and treatment of independent contractors, personnel working on our premises who are employed by temporary agencies, and any other persons or firms doing business for or with Orchid Pharma Limited.

### Definitions

- **Discrimination:** discrimination in relation to disability, means any distinction, exclusion, or 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.
- **"Company"** means "Orchid Pharma Limited"
- **"Reasonable Accommodation"** shall have the meaning assigned to it under the Act – i.e. 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
- The **"Act"** shall mean the Rights of Persons with Disability Act, 2016.

- **“Person with Disability”** shall have the meaning assigned to it under the Act – i.e. person with a long-term physical, mental, intellectual, or sensory impairment which, in interaction with barriers, hinders her/his full and effective participation in society equally with others.
- **“Policy”** shall mean this “Equal Opportunity Policy” adopted by the Company

#### **Commitment:**

The Company’s relationship with all of its Employees shall be based on principles of equal opportunity and fair treatment. Discrimination by the Company (or its Employees) on grounds like age, sex, gender, disability, ailment, religion, race, nationality, social or ethnic origin, color, sexual orientation, political opinion, and other personal characteristics unrelated to the inherent requirements of the job, is strictly prohibited and shall be subject to disciplinary action in accordance with the provisions of the Company’s Code of Conduct.

The Company shall not discriminate with respect to any aspect of the employment relationship including the hiring/selection process, promotions, transfers, provision of training opportunities, compensation, employee benefits, termination or retirement policies, and disciplinary practices. Further, with regard to Transgender persons, the Company shall maintain the confidentiality of the gender identity of the employees except where the Company or its representatives is required to disclose such information to government officials or in order to cater to or provide support to such Employees.

#### **Selection Process**

The Company adopts a transparent selection process guided by the merit of the candidate. The Company shall review the selection criteria from time to time to ensure that it is not discriminatory against Persons with Disabilities and Transgender Persons. Upon request, application forms shall be made available in alternative formats that are convenient for Persons with Disabilities and Transgender Persons

#### **Facilities and Amenities**

The Company shall as far as possible, endeavor to provide such facilities and amenities to Persons with Disabilities and Transgender Persons to enable them to effectively discharge their duties in the Company. The Company shall consider the specific and special needs of Persons with Disabilities and Transgender Persons employed by it and ensure that its facilities (including physical infrastructure, information and communication technology, safety and security, and transportation system, if any, provided by the Company) are easily accessible.

#### **Physical Infrastructure**

The Company shall endeavor to ensure that it provides barrier-free accessibility to Persons with Disabilities and that its physical infrastructure is disabled-friendly. Further, the Company shall endeavor to ensure that it provides infrastructural facilities, such as unisex toilets, to Transgender Persons. Towards this end, the Company shall, on a continuous basis, liaise with service providers, facility managers, or such other appropriate persons who manage the premises within which its offices are located, in order to endeavor to the observance of the accessibility standards prescribed under the Act in relation to its physical infrastructure. On a case-to-case basis, the Company may also opt to provide assistive devices for the convenience of Persons with Disabilities. Employees facing accessibility issues in relation to the physical infrastructure of the Company or with regard to any other

issue are requested to report the same to the Liaison Officer. Employees may report accessibility issues relating to the Company's information and communication technology, to the Liaison Officer.

### **Transportation System**

Transportation facilities, if any, provided by the Company shall adhere to the accessibility standards prescribed under the Act. Employees facing accessibility issues are requested to report the same to the Liaison Officer.

### **Other Facilities**

#### **Special leave**

Upon request by a Person with a Disability, the Company, may, at its discretion, allow special leave to such persons if such leave is required in connection with her/his disability.

#### **Reasonable Accommodation**

The Company may at its discretion offer Reasonable Accommodation to Persons with Disabilities to enable them to discharge the essential functions of their position in the Company. What constitutes Reasonable Accommodation may differ from case to case and shall be up to the discretion of the Company.

#### **Training and career development**

The Company shall ensure that all workshops, orientations, or materials provided for post-recruitment and pre-promotion training of its employees are consistent with the needs of Persons with Disabilities. Depending on the role and special needs of Persons with Disabilities, the Company may at its discretion give preference to such persons in matters of transfers and posting and, where applicable, allotment of residential accommodation.

### **Complaints**

Should an employee believe they have experienced harassment, bullying, or discrimination then they may either attempt to resolve the matter informally or invoke the formal complaint procedure under the Grievance Procedure to pursue their claim. All cases will be taken seriously, dealt with quickly, and treated with the utmost confidence. Employees are advised to seek the advice of their Prospect representative at the earliest opportunity.

#### **Grievance Redressal & Harassment Prevention:**

As per the Act, Orchid has appointed Mr. Ashok Clifford, the Head of Human Resources as the Liaison Officer who is responsible for taking initiative and providing the requisite support needed to realize the goals of an inclusive and accessible workplace and reasonable accommodation. The Liaison officer can be reached at [ashok@orchidpharma.com](mailto:ashok@orchidpharma.com)

#### **The Liaison Officer is responsible for:**

- Ensuring a disable-friendly workplace;
- Ensuring that all employees are aware of this policy and know their duties and rights in relation

- to the policy; and
- Develop proactive strategies to prevent discrimination and harassment.

### **Responsibility and Administration of the Policy**

Orchid's Board has overall responsibility for this Policy. However, The Human Resources Department has been delegated the day-to-day responsibility for administering, tracking, communicating, and reviewing this Policy and answering any questions that may arise. HR advises managers:

- On the application of this policy and equality legislation
- On the application of other HR employment-related policies in relation to equality and diversity issues

Each department head of Orchid shall assist in the implementation of this Policy by disseminating it within their departments and creating in their departments respect for the seriousness of compliance with this policy.

All managers must set an appropriate standard of behavior, lead by example, and ensure that those they manage adhere to the Policy and promote our aims and objectives with regard to equal opportunities. Managers will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practices. Human Resources has overall responsibility for equal opportunities training.

No retaliatory action will be taken against any individual for raising concerns as regards this policy. However, any such reporting by an employee if found to be in bad faith or in a false or frivolous manner, will be considered a violation of the code of conduct, and such employee may be subject to disciplinary action.