

Equal Employment Opportunity Policy

Namdev Finvest Private Limited

Registered Office:

S-1, S-7-8, SHREE NATH PLAZA, SECOND FLOOR,
NEER SAGAR MARKET, BHANKROTA,
JAIPUR, RAJASTHAN-302026
INDIA

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Policy Name	Equal Employment Opportunity	
Version	2.0	
Effective date	Oct 2024	
Prepared and proposed by	Mr. Gagan Sharma	
Approver	Board of Directors	May 2025



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1. Introduction

Namdev Finvest Private Limited (NFPL) is a Non-Banking Financial Company having valid Certificate of Registration with Reserve Bank of India vide registration No. B-10.00260 on 20th August 1997 under current RBI classification as NBFC – Non-Deposit taking Asset Finance Company.

It is focused on offering finance to MSME, Two-wheelers, Solar panel loan, Electric Vehicle (EV) loan, EV charging station loan and all kind of light commercial vehicles segment.

2. Philosophy

Namdev Finvest Pvt Ltd(NFPL, hereon) does not discriminate on the basis of:

- Race, color, or ethnicity
- Religion or creed
- National origin or ancestry
- Gender, gender identity, or gender expression
- Age
- Sexual orientation
- Marital status
- Disability (physical or mental)
- Genetic information
- Veteran status
- Any other characteristic protected by applicable federal, state, or local law

3. Commitment to Diversity and Inclusion

We value diversity and strive to create an inclusive environment where everyone feels welcome, respected, and empowered to contribute to our success. Our diverse workforce reflects the communities we serve and strengthens our organization.

4. Reasonable Accommodations

NFPL will provide reasonable accommodations to qualified individuals with disabilities and to individuals with sincerely held religious beliefs, practices, or observances, unless doing so would impose an undue hardship on the company.

5. Reporting and Enforcement

Employees who believe they have been subject to discrimination, harassment, or retaliation should report the incident to their supervisor, Human Resources, or human rights officer. All complaints will be taken seriously and investigated promptly and thoroughly through Employee Grievance Redressal Policy. Retaliation against individuals who report discrimination or participate in an investigation is strictly prohibited.

6. Accountability

All employees, managers, and supervisors are expected to uphold the principles of this policy and to foster a workplace culture of respect, fairness, and equality.

7. Review

This policy will be reviewed regularly and updated as necessary to ensure continued compliance with applicable laws and alignment with our organizational values.

To promote a non-discriminatory and an inclusive working environment and to enable Persons with Disabilities, who are employees of the Company, to work without apprehension of prejudice, bias and Discrimination and provide the right to be treated with dignity, respect and equality. This Policy has been formed to prohibit, prevent or deter discrimination at the workplace on account of disability and to provide the procedure for the redressal of complaints pertaining to such Discrimination.

8. Applicability

This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect from 5th August 2021. Where any Discrimination occurs against any Persons with Disability while at the workplace, the Company will take all necessary and reasonable steps to initiate appropriate action at such discriminating employee.

9. Definitions

9.1 “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;

9.2 “Employee(s) with Disability” shall mean person(s) with disabilities who is/are currently employed in the Company;

9.3 “Liaison Offer” shall mean President -HR appointed as the liaison officer by the Company to coordinate the recruitment of Persons with Disabilities and provisions of facilities and amenities for Employees with Disabilities;

9.4 “Person with Disability” shall mean 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;

9.5 “Reasonable Accommodation” shall mean necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden in a particular case, to ensure adherence to EEO and exercise of rights equally with others.

a. Physical Infrastructure

The Company aims to ensure that our physical infrastructure (buildings, furniture, facilities and services in the building/campus and transportation) adheres to the accessibility standards as prescribed under the Rules.

b. Digital Infrastructure

The Company endeavours to ensure that all our documents, communication and information technology systems adhere to the accessibility standards. Any Person with Disability facing accessibility challenges can reach out to the Liaison Officer.

10. Recruitment And Training

- The Company hires candidates purely based on aptitude, merit and suitability for the job/position in question and the roles and responsibilities associated with such job/position.
- The selection process shall include the following:
 - i. Application forms will be made available in alternate formats, based on request.
 - ii. If a Person with Disability needs any specific reasonable accommodation for the interview, she/he should write to the recruiter or the Liaison Officer.
 - iii. Each interviewer is mandated to record her/his comments on the candidate’s capability in the interview
 - iv. Evaluation form and/or any other documentation as may be applicable.
 - v. Reasons for rejection must be objective and not related to the person’s disability/personal characteristics/background.
 - vi. The selection process will be kept under constant review to ensure that they are non-discriminatory and that they relate purely to the skills needed for the job.
- Training: The Company will endeavour to provide training materials in accessible formats on request from Employees with Disabilities. The Employees with Disabilities requiring any Reasonable Accommodation during such training, such as assistive aids, accessible training venue, accessible materials, interpreter, scribe, etc. should place a request to the Liaison Officer at least 1 (One) week prior to the scheduled date of commencement of induction/training.
- Promotion: The Company follows wherever possible, the same amount of care and caution in appraisals and in the manner of promotion of employees including Employees with Disabilities as exercised by it at the time of selection. Promotion shall be purely objective and there will be no Discrimination based only on the ground of disability.

11. Special Leave

- The Company is sensitive to the needs of Persons with Disabilities and any request for extra leave by Persons with Disabilities for a reason related to her/his disability will be given impetus and the Company shall endeavour to grant such leaves wherever reasonably possible.

- The Company provides an option of unpaid special leave for a maximum period of 1 (One) month for Employees with Disabilities and need to undergo medical treatment. The procedure for availing leave is as detailed in the Company's policy governing leave.

12. Maintenance Of Records

The Company shall collect and maintain records as required under the Act, containing the following particulars:

- i. the number of Employees with Disabilities, and the joining date; the name, gender and address of Employees with Disabilities; the nature of disability of such persons;
- ii. the nature of work being rendered by such Employees with Disabilities; and the kind of facilities being provided to the Employees with Disabilities.
- iii. The personal information shared by an Employee with Disability about his/ her disability shall be maintained in a separate file and shall be kept confidential. Provided that such personal information may be disclosed, to the extent required, in the following cases:
- iv. Towards providing Reasonable Accommodation as required and/ or requested by an Employee with disability.
- v. To government officials investigating the compliance of the Company with the Act.

13. Liaison Officer

1. The Liaison Officer can be reached out at:
 - Liaison Officer- Jyotishikha Asheesh
 - Contact No.: 91-141-2250026
 - Email ID: Jyotishikha.asheesh1@namfin.in
2. The Liaison Officer shall have the following responsibilities:
 - i. Ensure that all employees of the Company are aware of this Policy;
 - ii. Frame an action plan to achieve the accessibility standards as laid down in the Act;
 - iii. Provide facilities, amenities and support as needed by Employees with Disabilities;
 - iv. Be the point of contact for any and all requests from Employees with Disabilities, including requests for Reasonable Accommodation;
 - v. endeavour to implement such requests from Employees with Disabilities wherever possible;
 - vi. be committed to achieve an inclusive and accessible environment for all the Employees with Disabilities;
 - vii. Prevent instances of Discrimination;
 - viii. Perform such other acts as may be reasonably required from time to time.
3. The Liaison Officer shall also address any complaints or grievances of Employees with Disabilities within 0-7 days. In the event of receipt of any complaint of Discrimination, the Liaison Officer shall proceed to make an inquiry into the complaint in accordance with the principles of natural justice and further during the course of inquiry provide an opportunity of being heard to the complainant and the respondent.

Where the Liaison Officer arrives at the conclusion that the allegation against the respondent has been proved, the Liaison Officer shall recommend to the management of the Company to take appropriate action, including a written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, terminating the respondent from service of the Company or that the respondent undergoes a counselling session.

4. In case an Employee with Disability is aggrieved by a decision of the Liaison Officer, then he/she shall report the same to the Mr Jitendra Tanwar within 15 (Fifteen) days of the decision of the Liaison Officer who shall act on the same within 30 (Thirty) days of receiving the same.
5. The Liaison Officer shall send a quarterly report, of all requests and/or complaints and action taken to the Mr. Jitendra Tanwar.
6. All employees are encouraged to report any incidents of violation of this policy and Liaison Officer shall take necessary action forthwith.



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