



EQUAL EMPLOYMENT OPPORTUNITY & NON- DISCRIMINATION POLICY

Bajaj Financial Securities Limited – FY 26

Approvals/Sign-off Sheet:

Approved By	Designation
Manish Jain	Managing Director
Reviewed By	Designation
Vikrant Birajdar	Head – HR
Rahul Dsilva	AVP – HR COE
Prepared By	Designation
Pranav Patankar	Manager – HR COE

Document Control Log

	Author	Approved By	Effective Date	Key Updates
Version 1	Neelanjana Saji	Manish Jain	1 January 2020	Creation of policy
Version 2	Dimple Arora	Neelanjana Saji	1 April 2023	Policy Refresh
Version 3	Nidhi Singh	Neelanjana Saji	1 April 2024	Policy Refresh
Version 4	Nidhi Singh	Manish Jain	1 April 2025	Policy Refresh
Version 5	Pranav Patankar	Manish Jain	03rd Dec 2025	Branding Changes

This Document

- Is the copyright of Bajaj Financial Securities Limited (BFSL) herein referred to as Bajaj Broking.
- Shall not be reproduced either partly or wholly.
- Shall not be subjected to manual correction or amendments.

AMENDMENTS to the STANDARD, if any:

- Shall be made, only by the policy owner as approved by the Management.
- Shall be incorporated in all the controlled copies and entered in the Document Control Log enclosed in the template.

Table of Contents

1. Purpose & Background	4
2. Policy Scope	4
3. Policy Guidelines	5
4. Complaint Process & Procedures	8
5. Amendments.....	9

1. Purpose & Background

Bajaj Financial Securities Limited (“BFSL”, “Bajaj Broking” or “Company”) is an equal opportunity and affirmative action employer. We have been and will continue to be committed to recruiting, hiring, promoting and training the most qualified individuals for positions at all levels within the organization. Only through obtaining, utilizing and enhancing the abilities of superior candidates at all levels will the Company be able to achieve its goal. We will, therefore, maintain our commitment to and support of equal employment opportunities for all individuals without regard to without any discrimination on the grounds of age, color, disability or veteran status, marital status, nationality or ethnic origin, race, religion, sex, sexual orientation, gender identity, disease (viz. HIV/Aids) (“Discrimination Characteristics”). The Company strives to maintain a work environment that is free from any harassment based on above considerations. This Equal Employment Opportunity & Non-discrimination Policy is subject to applicable Laws, regulations, qualifications, and merit of an individual.

This policy is consistently applied throughout the period of employment of the individual right from the recruitment process till retirement.

BFSL has a Zero Tolerance policy and is opposed to all forms of harassment or retaliation, including sexual, racial, and ethnic or religious harassment, regardless of whether the harassment or retaliation occurs directly or indirectly. Verbal or physical conduct directed at a person’s race, color, religion, gender, national or ethnic origin, age, sexual orientation, gender identity, disability or veteran status may constitute harassment and is prohibited.

Our commitment to equal employment opportunity and non-discrimination extends to any other protected classes which may exist under applicable law. This statement reaffirms our dedication to the principles of equal employment opportunity and non-discrimination and our expectation is that all employees will have to lend their full support to furthering the Company’s success by ensuring sincere implementation of this Policy.

The objectives of this Equal Employment Opportunity and Non-Discrimination Policy are to ensure that all:

- Our employees are personally responsible for treating each other with respect and dignity, which includes respecting the rights and differences of others
- Employment with BFSL will be based on merit and not on any irrelevant attributes or characteristics that an individual may possess
- Developmental and promotional opportunities will be based on performance, ability and potential, and will be consistent with the needs of the business

2. Policy Scope

This policy applies to all BFSL employees. BFSL aims to create employment opportunities such that all employees can apply themselves to their full potential.

3. Policy Guidelines

3.1 Equal Opportunities

- BFSL provides equal opportunities to its employees without regard for the Discrimination Characteristics. All actions of BFSL with regard to its employees, (in relation to their employment compensation, benefits, transfers, leave/(s), layoffs, training, education, and assistance) will be made in a transparent manner and without regard for the Discrimination Characteristics.
- Notwithstanding anything contained in the previous paragraph, if BFSL reasonably believes that its employment, workplace or premises do not adequately represent the balance of diversity of persons who bear one or more of the Discrimination Characteristics, it may, with the aim only of redressing that imbalance, take appropriate action against the employee in respect those aspects, of the Discrimination Characteristics that are sought to be adequately represented.
- Any person who believes himself or herself to have been subjected to discrimination on the basis of the Discrimination Characteristics is encouraged to bring the matter to the attention of the HEAD-HR of BFSL at the earliest practical opportunity.

3.2 Non-Discrimination

- BFSL is committed to providing a work environment for its employees that is free from harassment and discrimination.
- BFSL will not discriminate, but rather prohibits discrimination at the workplace based on any of the Discrimination Characteristics. BFSL will not condone any discrimination against any person on its premises, whether that person is in his/her employment or otherwise. In the event if any discriminatory practices are identified, steps will be taken to address the same appropriately.
- Any person who believes himself or herself to have been subjected to discrimination based on Discrimination Characteristics is encouraged to bring the matter to the attention of the Head-HR of BFSL at the earliest practical opportunity.
- BFSL ensures that an employee acting in accordance with this policy is not subjected to any retaliatory action.
- Any discriminatory action or behavior that constitutes an offence and/or violation of law will be reported to the police.
- BFSL prohibits discrimination against any person with disability in any matter related to employment, including under the Right of Person with Disabilities Act, 2016 ("Act") and Transgender persons (Protection of rights) Act 2019.
- With reference to individuals affected by HIV & AIDS the following additional protective measures shall apply:
 - BFSL will not and does not discriminate against employees or applicants having, perceived as having, living with or otherwise affected by HIV or AIDS.
 - An individual employee/ applicant affected by HIV/AIDS will be considered at par with any other illness in terms of our employee policies and benefits, including health and life insurance, disability benefits and leaves of absence.
 - In accordance with applicable laws, BFSL provides reasonable work accommodation when needed for qualified and experienced individuals.
 - No employee shall, either orally or in writing or in any other visible form, shall ever communicate, disseminate, publish any information or communication which may

- result in hatred, insult, discrimination and/or physical abuse of the employee/individual affected with HIV/AIDS;
- No employee shall victimize an individual/employee due to the reason that such individual/employee raised a complaint under the HIV/AIDS (Prevention & Control) Act, 2017 through any of the grievance redressal mechanism mentioned in this Policy.
 - All employees must adhere to this non-discrimination policy. Employees who refuse to work with, withhold services from, harass or otherwise discriminate against another employee because of his/her having HIV/AIDS, being perceived as having, living with HIV/AIDS, or being otherwise affected by HIV/AIDS, will be subject to appropriate disciplinary and/or other corrective actions.
 - At any time if any employee who may feel that they have been discriminated against as a result of having, being perceived as having, living with or being affected by HIV/AIDS, and those who have any other related concerns, are encouraged to utilize the current policy or Code of Conduct. Further, any employee who feels uncomfortable or affected, along with the supporting evidence if any, such employee may escalate to ecomplaints@bajajbroking.in, or whistleblower@bajajbroking.in, or reach out to their HR Partner.

3.3 Responsibilities - BFSL

BFSL will not tolerate harassment, behavior that is discriminatory or behavior that victimizes or may result in victimization of any individual employee or group of employees in its workplaces. Appropriate action basis investigation will be taken if employee(s) commit breach of this policy.

Equal Opportunity

BFSL will take all action to ensure that a conducive environment is provided for employees/persons with disabilities to perform their role and excel in the same. BFSL will build systems and processes to ensure:

- That appropriate facilities, infrastructure and amenities are provided to people with disabilities to enable them to effectively discharge their duties in the office premises.
- That provision is made for an accessible environment and of availability of assistive devices as required.
- BFSL will take affirmative action to ensure that all employment practices, such as advertising, recruitment, hiring, promotion, Company-sponsored training, educational assistance, transfer, layoff, termination, compensation, benefits, and social and recreational programs are free of discrimination or harassment with regard to the categories listed above.
- Any information obtained is voluntary, will be kept confidential, and will be used in accordance with applicable laws. Refusal to provide information will not subject an employee or applicant to any adverse treatment. Employees and applicants will be protected from coercion, intimidation, interference, discrimination or retaliation for filing a complaint or assisting in an investigation under the Right of Person with Disabilities Act, 2016 ("Act"), HIV/AIDS (Prevention & Control) Act, 2017 and Transgender persons (Protection of rights) Act 2019.
- That no opportunity is denied to people with disabilities, merely on ground of disability. BFSL has liaised with its parent company's (BFL) Diversity & Inclusion Committee, to help oversee the provision of the infrastructure and facilities required for the process of recruitment for Persons with Disabilities.

- That the BFSL HR Team will ensure if any grievance does arise and is brought up to the Head-HR concerning selection of person(s) with disability for any position, training, promotion, transfer posting, leave & preference in accommodation allocation etc., is dealt with in a fair and equitable manner free from any discrimination.

Non-Discrimination

- a) Pre-employment screening - BFSL will not do pre-employment HIV/AIDS screening as part of its fitness to work assessment. These are unnecessary and not required. Screening of this kind refers to direct methods (HIV testing), indirect methods (assessment of risk behaviors), and questions about HIV tests already taken
- b) Ordinary workplace contact - Employment and HIV/AIDS policies will be based on scientific and epidemiological evidence that people with HIV/AIDS do not pose a risk of transmission of the virus to co-workers through ordinary workplace contact
- c) Confidentiality - Confidentiality regarding all medical information including HIV/AIDS status will be maintained, recognizing the principle that employers have a duty to protect confidentiality of employees' medical information
- d) Benefits - HIV-infected employees will not be discriminated against and will continue to have access to all standard social security benefits and occupationally related benefits
- e) Reasonable changes in working arrangements - HIV infection itself is not associated with any limitation in fitness to work. If fitness to work is impaired by HIV-related illness, reasonable alternative working arrangements may be considered, subject to feasibility at the relevant point of time
- f) Continuation of employment - HIV infection is not a cause for termination of employment, unless the medical report of the Doctor suggests otherwise. As with many other illnesses, people with HIV-related illnesses should be able to work as long as medically fit for available appropriate work
- g) Promoting a safe work environment - BFSL is committed to providing a work environment that protects colleagues' health and safety. This commitment recognizes that HIV/AIDS cannot be transmitted through casual contact. Employees who know the facts about HIV infection and AIDS are less likely to react negatively or inappropriately to a colleague's illness
- h) Accommodation - People with HIV/AIDS will continue to have the accommodation that they are entitled to. They will not be transferred on the basis of complaints received from neighbors

3.4 Responsibilities – Employees

All BFSL employees have the following responsibilities:

- To comply with this policy and all applicable laws and regulations. Compliance is required whenever an employee is acting in their capacity as a representative of the Company.
- Employees have the responsibility of treating co-workers and all other individuals with dignity and respect and to help the Company in achieving these goals.
- Each Company location is responsible for obtaining and utilizing up-to-date information regarding applicable state and local laws and regulations.
- If an employee feels he or she is being subjected to discrimination, harassment, bullying or victimization, he or she can raise the same with the HR Team or use the existing grievance redress mechanisms such as whistleblower or ecomplaints.

- Any employee who violates this policy, or in any manner discriminates with any person with any disease/disability, or renders any harassment to such person shall be dealt with under the Code of Conduct of the Company

Employees' Concerns

- There will be no obligation for the employee to inform the employer or the Company regarding his/her HIV/AIDS status.
- Rights and opportunities: People with HIV/AIDS are entitled to the same rights and opportunities as people with other serious or life-threatening illnesses

3.5 Responsibilities – Manager

Managers and supervisors have the following additional responsibilities:

- Every member of BFSL management is responsible giving effect to this policy, to take reasonable steps to resolve complaints that are brought to their attention and to maintain confidentiality as far as practicable.
- Every manager and management of the organization and its divisions/function is responsible for ensuring that the spirit and intent of the Company's goals are achieved by strict adherence to the Equal Employment Opportunity & Non -discrimination policy.
- Any Manager who violates this policy, or in any manner discriminates any employee/person based on their gender or their disability, or renders any harassment to such person shall be construed as misconduct dealt with under the Code of Conduct of the Company

4. Complaint Process & Procedures

4.1 How To Make A Complaint

- A person wishing to make a complaint of discrimination can consult and file a complaint with the HEAD-HR
- The complaint should be made in writing within 5 working days of any such incident of discrimination

4.2 The Disciplinary Action Committee constituted under the Disciplinary Action Policy shall referred all the cases of breach/violation under this policy

To enable the implementation of provisions as laid down by Right of Person with Disabilities Act, 2016 ("Act"), Transgender persons (Protection of rights) Act 2019 and HIV/AIDS (Prevention & Control) Act, 2017, a Complaint officer will be designated by the HEAD-HR to redress such complaints

Fairness

- All complaints will be investigated without any bias and with the aim of promoting fairness, equality in employment and to eliminate any discriminatory approach based on Discrimination Characteristics

Confidentiality and the Right to Privacy

- BFSL will preserve the confidentiality of the employee involved in a complaint
- Excepting to the respondent on a need to know basis and to any regulator/judicial/quasi-judicial/ Law enforcement authority, BFSL will not share the information with any person

- If the outcome of the investigation does not yield any tangible evidence in support of the complaint, no documentation concerning the complaint will be shared with the respondent
- BFSL will retain all documentation for 12 months for informational purposes in the event that there is an internal appeal, or a complaint filed with an outside agency. However, in the event of any litigation, the employment record will be preserved for an indefinite period, till such time the litigation is completely closed/resolved

5. Amendments

The policy can be modified, amended, or withdrawn at any point of time at the discretion of management by issuing a notification to this effect.