



Equal Opportunity Policy for Persons with Disability under the **Rights of Persons with Disabilities Act, 2016** and the **Rights of Persons with Disabilities Rules, 2017**

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## 1. Introduction

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Vivifi India Finance Pvt Ltd. ("**Vivifi**" or "**Company**" or "**We**") is committed to provide equal opportunities in employment and creating an inclusive work place and work culture in which all employees are treated equally with respect and dignity. Vivifi values and welcomes diversity and will not treat anybody differently based on their race, sex, religion/beliefs, disability, marital or civil partnership status, age, maternity or paternity status, sexual orientation, gender identity, gender expression,

## 2. Objectives

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The "Equal Opportunity Policy for persons with Disability" ('**Policy**') has been framed in accordance with the provisions of the Rights of Persons with Disabilities Act, 2016 ('**Act**') and rules framed thereunder. The objective of the policy is to:

- i. Ensure that there shall be no discrimination against any person with disability in any matter relating to the employment
- ii. Ensure that the work environment is free from any discrimination.
- iii. Ensure that a conducive environment is provided to persons with disabilities to perform their role and excel in the same.
- iv. Ensure that appropriate facilities and amenities are provided to persons with disabilities to enable them to effectively discharge their duties in the office.
- v. Ensure that no promotion is denied to persons with disabilities, merely on the ground disability,
- vi. Ensure to maintain data regarding employees with disabilities in relation to their employment.
- vii. Ensure that Grievance Redressal Mechanism for addressing the grievance from persons with disabilities is available.

## 3. Definitions

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- I. '**disability**' means any condition which has a significant, adverse and long-term effect on a person's ability to carry out normal day-to-day activities;

- II. **'person with disability'** means 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;
- III. **'person with benchmark disability'** means a person with less than forty per cent of a specified disability where specified disability has not been defined in measurable terms and includes a person with disability where specified disability has been defined in measurable terms, as certified by the certifying authority.
- IV. **'specified disability'** means and covers all disabilities as specified in the Rights of Persons with Disabilities Act, 2016.
- V. **'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.
- VI. **'reasonable accommodation'** means necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden in a particular case, to ensure persons with disabilities the enjoyment or exercise of rights equally with others.
- VII. **'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 other therapy), person with intersex variations, genderqueer and person having such socio-cultural identities.

## 4. Policy Statement

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1. Vivifi aims to ensure that our physical infrastructure adheres to the accessibility standards as prescribed by the Government of India from time to time.
2. The selection process is the same for all candidates, including persons with disability. The hiring is purely based on merit and candidates are evaluated based on their skills and

- competence. Job applicants who need specific adjustment/ reasonable accommodation in the selection process can contact the recruiter or the Liaison officer.
3. In Vivifi, remuneration practices are based on merit without regard to the person's ethnic background or gender and are periodically updated based on market benchmarks. We seek to maintain a culture in which merit and performance are rewarded. The organization will ensure that career growth opportunities are provided solely based on merit for all employees
  4. The Company ensures there is no discrimination of any type against socially disadvantaged section in the workplaces.
  5. The organization will endeavour to ensure that all the training programs are accessible to employees with disabilities.
  6. Our Company has a robust and well-defined process for capturing and maintaining the records of its employees. We understand and respect that sharing information about one's disability is purely a personal preference, and nobody is mandated to do so. Confidentiality of data will be maintained with certain exceptions like data being made available for security, emergency and other relevant functions. The information will be shared on need basis, on the discretion of the Human Resource Department ('HRD')

## 5. Positions for Disabled Persons

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At Vivifi, the hiring for all the positions is purely based on merit and the candidates are evaluated based upon their skills and competence. Flexibility and reasonable accommodation will be provided to persons with disability on an individual basis.

Pursuant to the Persons with Disability Rules, 2017 all establishments are required to identify posts that are suitable for Persons with Disabilities. Further, in addition to Persons with Disabilities Rules, 2017, Transgender Persons (Protection of Rights) Rules, 2020 require all establishments to implement all measures for providing a safe working environment and to ensure that no person with disabilities or transgender person is discriminated against in any matter relating to employment and other related issues. At Vivifi all positions of employment, internships, etc are open to everyone, as long as they are capable and competent at carrying out the essential functions of the position.

## 6. Facilities and Amenities

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To enable the Persons with disabilities to effectively discharge their duties, the Company, may subject to regulatory guidelines, availability of devices, administrative constraints, provide the following facilities and amenities to them.

- a. Providing aids and appliances, assistive devices suitable for their needs by which the persons with disabilities could perform their duties efficiently.
- b. Preference in place of posting at the time of transfer/ promotion to the persons with disability as far as possible and subject to administrative constraints.
- c. Providing easy, barrier free accessibility and accessible workstations to Persons with Disabilities, wherever posted or transferred.
- d. Preferential allotment of quarters shall be considered to suit their needs wherever possible/available.
- e. Conveyance allowance to be paid to deaf and dumb employees, blind and orthopedically challenged employees as per Government guidelines issued from time to time.
- f. All actions shall be taken to ensure that a conducive environment is provided to persons with disabilities to perform their role and excel in the same.

## 7. Maintenance of Records

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Vivifi will collect and maintain data regarding Persons with Disabilities in relation to their employment, facilities provided and other necessary information as per the Act.

All employees will be asked to fill the Voluntary Disability Self Identification Form in order to give information regarding any disability that she/he may have.

An employee can edit the information at any time during her/his tenure. There will be no penalties imposed because she/he did not share information regarding her/his disability earlier. An employee who acquires disability can also edit and update the form.

## 8. Governance Framework

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### A. Appointment of Liaison officer:

Vivifi has appointed its Director, Srinath Kompella as a Liaison Officer who will be 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 is responsible for:

- Implementing the action plan for making the workplace and IT systems accessible for people with disabilities by liaising with the various departments in the organisation.
- Ensuring that all employees are aware of the Equal Opportunity Policy and know their duties and rights in relation to the Equal Employment Opportunity policy.
- Developing proactive strategies to prevent discrimination and harassment of persons (including disabled persons and Transgender Persons) at the workplace.

All employees have the responsibility to comply with the Equal Opportunity Policy. Managers and team members need to monitor the work environment to ensure that it is free from discrimination and harassment and encourages inclusion and respect for others.

All employees are encouraged to report any incidents of violation of this policy and Managers should act promptly when concerns arise, or complaints are made.

### B. Violations and Reporting

Vivifi has zero tolerance for disrespectful or inappropriate behaviour, unfair treatment, or retaliation of any kind. Harassment (physical, verbal or mental harassment) is not tolerated in the workplace and in any work-related circumstances outside of work. Complaints and grievances in relation to discrimination or harassment at the workplace and in any work-related circumstances outside of work may be forwarded to:

The Liaison Officer through e-mail communication marked to Srinath Kompella at [srinath@vivifi.com](mailto:srinath@vivifi.com). The Liaison Officer shall use best efforts to resolve and address

grievances in a timely manner including to prevent any further harm or inconvenience to the employee.

It is clarified that grievances raised with the Liaison Officer shall not affect any rights or recourse that employees may have under applicable laws.

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.

## **9. Review of Policy**

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This policy shall be reviewed bi-annually or earlier if necessary.