

CRISIL Policy on Equal Opportunities at the Workplace

Version	Effective	Updated by	Reviewed by	Approved by
1.0	December 15, 2023	Pradyumna Vengurlekar	Soni Mishra Pooja Mirchandani	Preeti Balwani Subodh Rai

A. INTRODUCTION

1. **CRISIL Limited and** its affiliates in India (together referred to as “**CRISIL**”) are equal opportunity employers and conduct its operations in accordance with all **applicable laws/regulations and with the highest ethical standards**. CRISIL is firmly committed to providing equal opportunities in employment including in the recruitment, training, and development of employees (including performance evaluation, rewards and recognition transfers, assignments, termination and maintaining a **diverse and inclusive** workplace through an enabling work environment and a culture that welcomes differences and creates a sense of belonging. CRISIL strives to create an environment where employees feel safe and comfortable and grow to achieve their full potential.
2. CRISIL does not discriminate or tolerate any form of discrimination against any employee or applicant for employment on the basis of race, colour, caste and ethnicity, creed, gender, or LGBTQIA+ status (or any expansions thereof), religion, military veteran, marital status, age, national origin, or ancestry, physical or mental disability, medical condition including genetic characteristics, sexual orientation, or any other consideration made unlawful by applicable laws. It also includes a perception of anyone who has any of those characteristics or is associated with a person who has or is perceived as having any of those characteristics. **All such discrimination is unlawful**. CRISIL will take all necessary action to avoid discrimination in relation to, but not limited to, recruitment, advertising, employment, promotion, transfer, pay and benefits, training, lay-off, and termination of services.
3. This Equal Opportunity Policy (“**Policy**”) has been implemented by CRISIL to underscore its commitment to:
 - (a) Rights of Persons with Disabilities
 - (b) Protection of Rights of Transgender Persons; and
 - (c) Protection of Rights of Persons with HIV/AIDS.

B. IMPORTANT DEFINITIONS

1. **Person with Disability / PWD** means a person with long-term physical, mental, intellectual, or sensory impairment which, in interaction with Barriers, hinders their full and effective participation in society equally with others.
2. **Barrier** means any factor including communicational, cultural, economic, environmental, institutional, political, social, attitudinal, or structural factors which hamper the full and effective participation of PWDs in society.
3. **HIV-related Information** means any information relating to the HIV status of a person, including their medical records pertaining to their HIV status (*such as HIV test reports, doctor's prescriptions, details of their medical treatment*).

4. **RPWD Act** means the Rights of Persons with Disabilities Act, 2016 read with the Rights of Persons with Disabilities Rules, 2017.
5. **Reasonable Accommodation** means 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.
6. **Transgender** is an inclusive term that refers to trans-men and trans-women (*whether or not such person has undergone sex reassignment surgery or hormone therapy or laser therapy or such other therapy*), persons with intersex variations, and individuals who are genderqueer.
7. **Transgender Members** include employees of CRISIL who identify as Transgender.

C. PROTECTING THE RIGHTS OF PERSONS WITH DISABILITIES

1. Overview

- (a) CRISIL is committed to the objectives and spirit of the Rights of Persons with Disabilities Act, 2016, and the Rights of Persons with Disabilities Rules, 2017, and has accordingly provided for the protection of the rights of Persons with Disabilities. CRISIL will identify, from time to time, suitable roles for Persons with Disabilities within the organization.
- (b) If such persons are hired, CRISIL will also provide them with the requisite support so that they can discharge duties effectively and have equal opportunities for success at the organization as any other employee.
- (c) Since an employee with a disability may have specific concerns and may have additional requirements, they are requested to contact the HR Department from time to time, to enable CRISIL to make suitable arrangements for them.

2. Applicability

- (a) This Section of the Policy applies to all employees of CRISIL who can be classified as Persons with Disability ("**PWD**"). To further clarify: (i) persons who **apply** for any of the Identified Posts (*discussed below*), and (ii) employees who **acquire any disability** in the course of their employment with CRISIL, are also covered under this Section of the Policy.
- (b) This Section describes the posts that are identified for PWDs at CRISIL (the "**Identified Posts**") along with the requisite qualifications, how the selection process takes place, what kind of training and support would be provided, and specifies a grievance redressal mechanism in case of any complaints by PWDs.
- (c) Ms. Prachi Bawari, who has been appointed as the **Liaison Officer**, will be in charge of the implementation of this Section of the Policy.

3. List of Identified Posts

- (a) Please visit the internal job portal for the list of available roles including any Identified Posts as the case may be.

- (b) For each of these Identified Posts, preference will be given to PWDs. CRISIL will undertake recruitments for these posts on the basis of qualifications and merit, and there will be no **discrimination** in respect of appointment, salaries, training, evaluations, promotions, and general career progression on the basis of disability. We strongly encourage candidates with different disabilities to apply.
- (c) If an employee acquires a disability during the employment tenure, CRISIL will undertake best efforts to ensure that no employee is dismissed from services purely on account of having acquired a disability in the course of their employment.
- (d) Further, CRISIL shall ensure that: (i) its facilities, technologies, privileges and benefits are made accessible to all employees who are PWDs; (ii) PWDs do not suffer any form of bullying or harassment while employed at CRISIL; and (iii) Reasonable Accommodation is provided to all PWDs appointed to any of the above Identified Posts (*as maybe necessary*). At all times, PWDs are encouraged to speak to the **Human Resource Department/Liaison Officer**, for any clarification or assistance that they may require.

4. **Manner of Selection**

- (a) **Advertisement of vacancies:** CRISIL will make efforts to widely advertise vacancies, including notifying disability organizations wherever possible. Vacancy advertisements in respect of the Identified Posts will include appropriate references to equal employment opportunities for PWDs. Application forms will be made available in alternate formats, based on request.
- (b) **Selection Process:** CRISIL will follow a customary selection process which shall include but not limited to technical and behavioral assessments, interviews (combination of face to face or virtual), any written assessments (if applicable). CRISIL shall also provide reasonable accommodation during the selection process, on a case by case basis.

5. **Other Facilities**

- (a) **Performance Evaluation:** For evaluation of the performance of PWDs, CRISIL will prescribe objective evaluation criteria, taking into account any Reasonable Accommodation provided.
- (b) **Training and Career Development:** CRISIL will ensure that appropriate training is provided to PWDs. Wherever such training is required, CRISIL shall ensure that it is in an accessible format. If any PWD requires any specific assistance, they are requested to approach the Liaison Officer/the Human Resource Department.
- (c) **Disability Leave:** An employee's request for extra leave for any reason related to their disability, will be treated as a request for Reasonable Accommodation and will be evaluated accordingly, on a case-by-case basis subject to providing necessary documentation. Such leave will be provided in addition to their other leave entitlements under the law and CRISIL's internal policies.
- (d) **Travel, stay and transport:** For official travel, PWDs will be provided with accessible modes of transport, and will be allowed to travel with a companion/attender. To the extent possible, CRISIL will also ensure that accessible accommodation is provided.

- (e) **Employee engagement and social inclusion:** CRISIL is conscious that in the course of employment, PWDs may face issues regarding integration at the workplace. To this end, CRISIL will take various initiatives from time to time, which will be further outlined by the Liaison Officer/the HR Department. Specifically, CRISIL will: (i) undertake sensitization training for its employees on the rights of PWDs; and (ii) endeavor to ensure that PWDs participate in all CRISIL-sponsored events and that such events are conducted at accessible venues.

6. Maintenance of Infrastructure

- (a) **Physical Infrastructure:** CRISIL aims to ensure that all physical infrastructure (*including buildings, furniture, facilities, transportation, and services relating to the workplace*) adheres to the accessibility standards as prescribed by the Government of India. PWDs are encouraged to report any accessibility-related concerns to the Liaison Officer /the Human Resource Department.
- (b) **Digital Infrastructure:** CRISIL will continuously strive to ensure that its documents, communications, and IT systems adhere to the prescribed accessibility standards. Specifically, CRISIL shall ensure that the documents placed on websites are in the Electronic Publication (e-PUB) or Optical Character Reader (OCR) based pdf format.
- (c) **Reasonable Accommodation:** CRISIL will ensure that all employees who are PWDs receive Reasonable Accommodation such that: (i) they are ensured equal opportunity for appointment to the Identified Posts; and (ii) they are able to perform the essential job functions and enjoy the same benefits and privileges as non-disabled employees.

Examples of Reasonable Accommodation may include (but not be limited to) acquiring or modifying certain equipment or devices, modifying assessment, and training materials, modifying work schedules, reassignment to a vacant position, disability-related leave, relaxed working hours, work-from-home options, etc. Further, in the course of undertaking their duties, PWDs may approach the Liaison Officer/Human Resource Department with a request for Reasonable Accommodation, which will be considered on a case-to-case basis. At no point will CRISIL require any employee who is a PWD to bear (directly / indirectly) any costs pertaining to the Reasonable Accommodation provided. All documents concerning an employee's Reasonable Accommodation request would be strictly confidential.

- (d) **Assistive Devices:** CRISIL will provide PWDs with Assistive Devices as and when required.

7. Compliance and Maintenance of Records

- (a) CRISIL will collect and maintain data regarding employees who are PWDs, in the manner specified under the RPWD Act and in accordance with the provisions under Digital Personal Data Protection Act 2023, as applicable.
- (b) Any and all information shared by an employee regarding their disability will be kept strictly confidential. However, the following disclosures will be considered exceptions: (i) disclosures to HR department, managers/supervisors of PWDs in connection with providing any Reasonable Accommodation; (ii) disclosures to security personnel to

facilitate any necessary support during an emergency; and (iii) disclosures to Government officials in connection with any investigation related to the RPWD Act.

8. **Grievance Redressal Mechanism:** Any PWD who has been directly / indirectly discriminated against, harassed, coerced, or subjected to any form of bullying or intimidation (including denial of any Reasonable Accommodation without any justification) is free to file a complaint in the manner specified under **Annexure 1** of this Policy.

D. PROTECTING THE RIGHTS OF TRANSGENDER PERSONS

1. Overview

- (a) CRISIL endeavours to provide a safe working environment while ensuring that no Transgender Member is discriminated against in any manner at CRISIL. We are committed to providing Transgender Members with the requisite support such that they are on equal footing with any other employees of the organization.
- (b) This Section of the Policy seeks to ensure the participation, contribution, progress, and success of all Transgender Members by fostering an environment where they feel included, are afforded equal rights, and are treated fairly and respectfully at CRISIL.
- (c) This Section of the Policy will apply to all Transgender Members. While there is no compulsion to do so, if Transgender Members covered under this Policy come forward and identify themselves to the HR Department, CRISIL would welcome such a step so that CRISIL can make appropriate arrangements for them.

2. Infrastructural Facilities and other Aspects

(a) Restroom accessibility and Hygiene Products

- i. CRISIL will ensure that Transgender Members have access to restrooms corresponding to their gender identity, that is, Transgender women will have access to the women's restroom and Transgender men will have access to the men's restroom. A Transgender Member will have the sole decision to determine the choice of restroom.
 - ii. Additionally, CRISIL will make provisions, if required, for gender-neutral or unisex restrooms for all employees. Any employee who has a need or desire for increased privacy, regardless of the underlying reason, will have access to such unisex restrooms.
 - iii. CRISIL will ensure that Transgender Members have access to requisite hygiene products and other similar amenities.
- (b) **Privacy:** Transgender Members will have the right to discuss their gender identity or expression openly, or to keep that information private. CRISIL will keep information about an employee's Transgender status confidential and such information may be shared with any third party only for specified purposes if any with the voluntary and informed consent of the Transgender Member, and in accordance with the provisions under Digital Personal Data Protection Act 2023, as applicable.
 - (c) **Names/ Pronouns:** Transgender Members will be addressed by the name and pronoun

that correspond to their gender identity. Such information may be communicated to the HR Department. A court-ordered name or gender change is not required by CRISIL.

If an employee is unsure of the pronoun preferred by a Transgender Member, they will politely ask such Transgender Member as to how they would like to be addressed. The intentional or persistent refusal to respect an employee's gender identity will constitute harassment and is in violation of this Policy, attracting serious consequences including disciplinary action.

(d) **Dress Code:** Transgender Members and gender non-conforming employees will have the right to comply with CRISIL's dress codes in a manner consistent with their gender identity or gender expression.

(e) **Transitioning on the Job**

i. Employees who transition in the course of their employment by way of medical intervention, i.e., any gender-affirming medical intervention undertaken by an individual to facilitate the transition to their self-identified gender, including but not limited to counselling, hormonal therapy, and surgical intervention, if any, will receive the reasonable support and cooperation of CRISIL.

ii. The Human Resource Department will work with each transitioning employee individually to ensure a successful workplace transition, such as adjusting personnel and administrative records and even developing an individualized communication plan to share the news with co-workers and clients if so desired by the employee.

iii. For assistance in relation to transitioning on the job, the employee will reach out to [their respective business partners in the Human Resource Department.

3. **Non-Discrimination:** CRISIL prohibits discrimination of any kind, including but not limited to, failure to hire, failure to promote, or unlawful termination against an employee because of the employee's Transgender status, actual or perceived gender identity. Transgender Members will be subject to the same rules and regulations governing service conditions and will be entitled to the same employment benefits and perks, as any other employee of the same or similar designation. Any incident of discrimination, harassment, or violence based on Transgender status, gender identity, or expression, will be given immediate and effective attention, including but not limited to investigating the incident, taking suitable corrective action. If any Transgender Member's safety is threatened, they should report it immediately to their respective business partners in the Human Resource Department who will accordingly arrange for security and safe transportation.

4. **Grievance Redressal:** Any employee who believes they have been discriminated on grounds of their gender identity/Transgender status or any employee is of the opinion that a violation of this Section has taken place, may file a complaint and take recourse in the manner specified under **Annexure 1** of the Policy and the complaint will be evaluated and investigated.

E. PROTECTING THE RIGHTS OF PERSONS WITH HIV/AIDS

1. **Overview**

- (a) CRISIL recognises that people living with HIV/AIDS are greatly impacted by multifarious discrimination, loss of livelihood, inequality and infringement of rights and is committed to creating awareness on prevention of HIV/AIDS amongst its stakeholders and also by extending necessary care and support to the affected employees and their family members.
- (b) This Section has been implemented in line with the requirements under the Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Act, 2017 and the Government's National HIV & AIDS Policy, 2022 to provide a conducive and safe work environment to employees impacted by HIV/AIDS.
- (c) This Section is applicable to all employees of CRISIL and individuals who have applied for a position with CRISIL.

2. Non-Discrimination:

- (a) CRISIL does not tolerate any form of discrimination against employees or applicants who are infected by HIV/AIDS (perceived or diagnosed) or employees/applicants who are co-habiting with someone affected by HIV or AIDS, in any matter concerning their employment/association with CRISIL. Discrimination may include denial of employment opportunity, or termination of employment, and/or unfair treatment at the workplace.
- (b) CRISIL also prohibits the segregation of employees on the basis of their HIV status. An employee shall not be segregated or ostracized on the basis of their HIV status.
- (c) CRISIL will not require any applicant to undergo an HIV screening test as a pre-requisite for obtaining employment.
- (d) CRISIL treats HIV/AIDS the same as other illnesses in terms of all f its employee policies and benefits, including health and life insurance, disability benefits, and leaves of absence. Employees who refuse to work with, withhold services from, harass or otherwise discriminate against another colleague because of them being affected by HIV/AIDS (*or perceived to be affected*) or living with someone affected by HIV/AIDS, will be subject to strict disciplinary action.

3. Reasonable Accommodation

- (a) CRISIL will provide reasonable accommodation to employees/applicants who are affected by HIV/AIDS, wherever needed. An employee/applicant may reach out to the HR Department to request any reasonable accommodation. Such requests will always be kept confidential by CRISIL.
- (b) The nature of such reasonable accommodation will be determined by CRISIL on a case-by-case basis and may inter alia include additional leaves, flexible work timing, permission to work from home.

4. Confidentiality related to HIV Status:

- (a) CRISIL will keep any and all HIV-related Information of its employees/job applicants completely confidential. No employee will be forced to disclose their HIV-related

Information except by court order that such disclosure of such information is necessary for the determination of issues in the matter before it.

(b) No employee will disclose any HIV-related information of the other person with whom they share a fiduciary relationship or otherwise except by informed consent except when required under law to do so. CRISIL has reasonable checks in place to ensure that an employee's HIV status is not made available to any unauthorized persons and CRISIL shall stay compliant with the confidentiality requirements enumerated under the Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Act, 2017 and the Government's National HIV & AIDS Policy, 2022.

5. **Grievance Redressal:** Any employee/job applicant who believes they have been discriminated on grounds of their HIV status or the HIV status of an individual with whom they co-habit, is encouraged to file a complaint in the manner specified under **Annexure 1** of the Policy and the complaint will be evaluated and investigated in the manner specified therein.

F. OTHER PROVISIONS

1. This Policy shall be read in conjunction with all other policies of CRISIL and the individual employment contracts of the employees.
2. CRISIL reserves the right to modify this Policy as it may deem necessary. All such changes will be duly communicated to the employees.
3. If any employee has any questions in relation to this Policy, they may reach out to the members of the HR Department.

ANNEXURE 1

GRIEVANCE REDRESSAL MECHANISM

(1) Details of the Complaints Officer and the Complaints Committee

- (a) Ms. Maya Vengurlekar, Senior Director and Head, CRISIL Foundation has been appointed as the Complaints Officer/Grievance Officer under this Policy (“**Complaints Officer**”). The Complaints Officer will be responsible for the overall implementation of the Policy.
- (b) CRISIL has also constituted a Complaints Committee comprising – Chief Human Resource Officer, General Counsel, President – Risk and Compliance, (“**Complaints Committee**”). The Complaints Committee shall be responsible for taking the necessary action based on the findings and recommendations of the Complaints Officer for each complaint that has been filed under this Policy. The Complaints Committee, before taking any action can consult the MD and CEO on a case to case basis. In the event the Complaints Officer is unable to address a complaint (such as on account of ill health, personal leave, conflict of interest, or any other justifiable reason), the Complaints Committee shall nominate a member of CRISIL to conduct the investigation.

(2) Filing a Complaint

- (a) If an employee faces any form of discrimination under this Policy or is of the opinion that a violation of this Policy has taken place, the employee is encouraged to file a written complaint with the Complaints Officer via maya.vengurlekar@crisil.com in the manner specified under **Annexure 2** of the Policy.
- (b) Alternatively, an employee may also personally submit a written complaint directly to the Complaints Officer (*in the format specified above and under Annexure 2 of this Policy*).

Complaints filed on social media and anonymous complaints will not be admitted under this Policy. If an employee is unable to file a written complaint, the Complaints Officer will render all reasonable assistance to the individual to file the complaint in writing.

- (c) An employee must file a complaint within 3 (three) months from the date the alleged incident took place and in case of a series of incidents, within a period of 3 (three) months from the date of the last incident. If an employee is unable to file a complaint within account of certain facts and circumstances, the employee shall communicate the same to the Complaints Officer, who then will discuss the matter with the Complaints Committee. The Complaints Committee may, at its sole discretion, extend this time limit by up to 3 (three) more months if it is satisfied that circumstances prevented the Complainant from filing the complaint within a period of 3 (three) months.

(3) Acknowledgment and Registration of Complaints

- (a) The Complaints Officer on receipt of a complaint will provide an acknowledgment to the complainant and record the complaint in electronic form.
- (b) The time when the complaint has been filed and the action taken by the Complaints Officer in this regard should also be duly recorded and every complaint will be numbered sequentially.

(4) Investigation:

- (a) The Complaints Officer shall investigate the complaints in a fair, just, and transparent manner and the Complaints Officer:

- i. will act in an **objective and independent** manner while investigating a complaint filed under this Policy. The Complaints Officer will proceed with the investigation in accordance with the principle of natural justice and during the course of investigation, the Complaints Officer will provide the complainant and the respondent and the relevant witnesses, with the opportunity of being heard.
 - ii. permit all relevant parties to submit any document/information that may be relevant to the investigation.
 - iii. conduct as many meetings as may be necessary to conduct the investigation.
 - iv. recommend any interim measures to CRISIL that may be necessary to safeguard the interest of relevant parties.
 - v. record the inquiry proceedings (whether audio or video) and/or consider preparing the minutes of the hearing and getting it duly signed by the relevant parties.
 - vi. may summon any other employee or external party to appear during the investigation as a witness.
- (b) In case the inquiry is initiated under Sections C and D of this Policy, the Complaints Officer will conclude the investigation within 15 days of receipt of the complaint, unless there are unavoidable circumstances for the delay. In case the inquiry is initiated under Section E of the Policy, the Complaints Officer will conclude the investigation within 7 days of receipt of the complaint, unless there are unavoidable circumstances for the delay.
- (c) Upon completion of an investigation, the Complaints Officer shall prepare an investigation report which shall contain the facts of the case, the findings of the investigation and the recommendations of the Complaints Officer. The Complaints Officer shall submit the investigation report to the Complaints Committee for further consideration.
- (d) In the event the respondent is found to be in violation of the Policy, depending upon the gravity of the offense and without prejudice to any legal right(s) that the complainant may have, the Complaints Committee can take the following actions:
- i. To take the appropriate measures to rectify the violation and initiate appropriate disciplinary action against the respondent.
 - ii. Direct the respondent to undergo training or counselling to address any specific issues.
 - iii. Any other action as it may deem fit, depending upon the facts and circumstances of the matter.
- (e) Upon completion of the investigation, the Complaints Committee will inform the complainant about the action taken in relation to the complaint.

(5) False Complaints

- (a) Where the Complaints Committee arrives at a conclusion (*after undertaking an inquiry*) that the allegation against the respondent is malicious or that the complainant has made the complaint knowing it to be false or that the complainant has produced any forged or misleading document, it may be recommended that CRISIL takes action against the complainant.
- (b) The Complaints Committee may also take appropriate disciplinary action if any witness has given false evidence or produced any forged or misleading document. However, mere inability to substantiate a complaint or provide adequate proof will not result in any action as detailed in this clause.

(6) Protection against Retaliation

- (a) CRISIL prohibits any form of retaliation against anyone who has raised a complaint under this Policy or has cooperated in any inquiry under this Policy.

- (b) Any individual who believes that they are experiencing any form of retaliation should report it to the Complaints Officer and CRISIL will then address the concerns immediately. Any person found to be guilty of retaliation may be subject to disciplinary action.

(7) Confidentiality

- (a) CRISIL understands that it is difficult for the complainant to come forward with a complaint under this Policy and recognizes the complainant's interest in keeping the matter confidential.
- (b) To protect the interests of the complainant, the entire inquiry process will be kept confidential at all points of time.

ANNEXURE 2
COMPLAINT

1. Date of Incident: _____
2. Place of Incident: _____
3. Description of Incident: _____
4. Person or institution responsible for the incident:

Signature / Thumb Impression of the complainant*:

Name: _____

Date: _____

Mobile: _____

E-mail ID: _____

Address:

—

For Official Use Only:

Complaint Number: _____

*Where the complaint is received orally or telephonically and reduced to writing by the Complaints Officer, the Complaints Officer shall sign and date the Form.