

### Equal Opportunity Policy

<b>Version</b>	1.2
<b>Last Reviewed &amp; effective from</b>	31 <sup>st</sup> March 2023
<b>Objective</b>	Max Life recognizes the value of a diverse workforce. We are committed to providing equal opportunities in employment and creating an inclusive workplace and work culture in which all employees are treated with respect and dignity.
<b>Purpose</b>	At Max Life, workforce diversity is a business imperative. We strive to ensure that our workforce represents all sections of the society. We believe that, by doing so, we would be better equipped to develop and deliver accessible and inclusive products and services, to meet the needs of our clients and customers better, thus achieving business excellence. This Policy is in accordance with the provisions of The Rights of People with Disabilities Act, 2016 (“Act”).
<b>Applicability</b>	This Policy applies to all employees and offices of Max Life.
<b>Definitions</b>	<ul style="list-style-type: none"> <li>a) <b>Act</b> means ‘The Rights of Persons with Disabilities Act’ 2016</li> <li>b) <b>Discrimination</b> 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.</li> <li>c) <b>Differently Abled</b> (person with disability / PwD) 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.</li> <li>d) <b>Disability Certificate</b> means a certificate of disability issued by a competent authority in accordance with Section 57(1) of the Act.</li> <li>e) <b>Liaison Officer</b> means an officer designated to look into the grievance of Differently Abled persons employed with Max Life.</li> <li>f) <b>Reasonable Accommodation</b> means necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden in a particular case, to ensure to the enjoyment or exercise of rights to Differently Abled equally with others.</li> </ul>
<b>Policy Framework (equal opportunity &amp; non-discrimination)</b>	<p>Max Life is committed to providing equal opportunities without any Discrimination on the grounds of age, colour, disability, origin, nationality, religion, race, gender, or sexual orientation and will not engage in any kind of verbal or physical harassment based on any of the above or any other reason. To this end:</p> <ul style="list-style-type: none"> <li>a) All employees of Max Life are personally responsible for treating each other others with respect and dignity, which includes respecting the rights and differences of.</li> <li>b) Equal pay and terms of employment (including benefits, training, promotions, performance reviews, transfers, exits etc.) without any bias. A transparent and standard rewards framework shall be applicable to all employees which is objective driven basis individuals’ roles, qualification, experience and duties.</li> <li>c) Developmental and promotional opportunities will be based on performance, ability and potential and will be consistent with the needs of the business.</li> <li>d) Max Life will not tolerate harassment, behavior that is discriminatory or behavior that victimizes any individual or group in our workplaces based on caste, creed, religion, disability, etc.</li> <li>e) No opportunity, as may be suitable to a Differently Abled person, will be denied to any such person basis only on his/her disability. It is clarified that merit shall be the sole criteria of appointment of Differently Abled persons on positions suitable for such persons.</li> <li>f) Appropriate action will be taken if any employee is found breaching this policy either through</li> </ul>

	<p>discrimination, harassment, bullying or victimizing another employee.</p> <p>g) If an employee feels he or she is being subjected to discrimination, harassment, bullying or victimization, he or she can file a complaint of such behavior with the Liaison Officer. All grievances shall be taken seriously and treated with sensitivity, fairness and in confidence.</p> <p>h) If an employee acquires a disability during her/his employment tenure she/he can return to work at the same rank as before. In case the employee is unable to perform the current job, the organization will invest in re-skilling the employee for another position at the same rank or higher.</p>
<p><b>Facility &amp; Amenity provided to the persons with disabilities</b></p>	<p>Max Life shall endeavor to provide proper infrastructure for easy accessibility and barrier free environment to all PwD employees and clients. Following arrangements are in place:</p> <ul style="list-style-type: none"> <li>• Wheelchair</li> <li>• Ramp with Rails</li> <li>• Lift with Braille Signage and audio prompts</li> <li>• Accessible Washrooms</li> <li>• Reserved Parking for PwD's</li> <li>• Broad Access Pathways</li> <li>• Doctors Room</li> <li>• Drinking Water Stations and Pantry boys to serve water when needed</li> <li>• Accessibility software enablement on screen like magnifier, audio prompts, read aloud function etc.</li> </ul> <p>In addition to these, to ensure ease of work, the below arrangements are also available as per requirement:</p> <ul style="list-style-type: none"> <li>• Prioritization in handling issues of PwD employees and clients</li> <li>• Ergonomic chairs, desk/workspace assessment and modification</li> <li>• Accessible training materials</li> <li>• Flexible or work from home option</li> <li>• Regular breaks</li> <li>• Modification in work schedules</li> <li>• Change in working pattern or training</li> <li>• Reassignment to a vacant position (basis suitability of candidature)</li> <li>• Provision for home visit/at home service for clients who have disabilities.</li> </ul> <p>Alternate arrangements shall be provided to Differently Abled persons to enable them to effectively discharge their duties at Max Life.</p>
<p><b>Identification of positions and manner of selection and recruitment</b></p>	<p>Max Life commits that no opportunity will be denied to Differently Abled persons and there will be no Discrimination in any manner. The list of posts identified for PwDs are mentioned below:</p> <ul style="list-style-type: none"> <li>• Operations Manager – (AM/DM/Manager/Cluster Manager/Senior Manager) – One position</li> <li>• Business Development - (AM/DM/Manager/SM)- One position</li> <li>• Sales Manager- One position</li> <li>• Recruitment Officer/Manager- One position</li> <li>• Senior Officer/ AM/ DM - Customer Advisory Team- One position</li> <li>• Branch Relationship Manager - Customer Advisory Team- One position</li> <li>• Associate - Customer Care- One position</li> <li>• Financial Service Consultant – SPARC- One position</li> </ul> <p>Wherever possible, vacancy advertisements shall include an appropriate statement on equal opportunities for Differently Abled persons.</p>

	<p>Application forms will be made available in alternate formats or help will be provided in filling the application forms based on request. All job applicants would be measured against the key selection criteria taking into account provisions for reasonable accommodation.</p> <p>The key selection criteria would include only the specific skills, knowledge and abilities regarded as essential for performing the functions of the job.</p> <p>Applicants invited for an interview should inform if they require any individual support or assistance prior to the interview. Max Life shall make all arrangements reasonably feasible to accommodate these requests.</p> <p>Candidate with necessary Disability Certificate issued in accordance with the Act by the competent authority will be considered for identified positions.</p> <ul style="list-style-type: none"> <li>• No person with disability will be denied any employment opportunity on grounds of disability and as such, all the vacancies will be filled based on individual’s competence, ability, trainability and suitability in relation to the overall job requirements;</li> <li>• Any statutory directions/ notifications applicable to the person with benchmark disabilities with regards reservations and other facilities/ concessions shall be strictly adhered to.</li> <li>• Post suitable for PWD shall be identified based on respective category of person with benchmark disabilities and in line with the directions/ notification issued by statutory authorities from time to time, if any. It should be ensured that the PWD employees are posted on profiles which are conducive for them to work efficiently and effectively.</li> </ul> <p><b>Selection process:</b></p> <ul style="list-style-type: none"> <li>• Max Life shall follow a transparent selection process based on merit and without any bias to the disabilities of a prospective candidate.</li> <li>• Selection criteria (job description and employee specification) will be kept under constant review to ensure that they are non-discriminatory and relate purely to the skills needed for the job.</li> </ul>
<p><b>Post-recruitment and pre-promotion training, Preference in Transfer &amp; posting</b></p>	<p><b>Post-recruitment and pre-promotion training</b></p> <ul style="list-style-type: none"> <li>• Induction training is an essential component of the service requirement of an employee. Induction training program for the persons with disabilities shall be imparted together with the other employees.</li> <li>• As the case maybe, job specific post-recruitment training for PwD employees may be conducted to enable them to carry out their jobs effectively.</li> <li>• The necessity of training and its nature shall be determined by the HR department in consultation with the concerned function. Max Life will endeavor to provide course materials meant for induction and training in accessible formats on request.</li> <li>• If required, Pre-promotion training shall be conducted for the PwD employee</li> </ul> <p><b>Preference in transfer posting</b></p> <ul style="list-style-type: none"> <li>• Employees with disability will be offered a change in base location as part of talent development or promotion depending on their personal situation with respect to adequate support, infrastructure, family presence.</li> </ul> <p><b>Transfer of employees having dependent child/children and spouse with disabilities</b></p> <ul style="list-style-type: none"> <li>• Employees having dependent child/children/spouse with disabilities to be taken care of, would be considered on a case to case basis keeping in mind their personal situation</li> </ul>

<p><b>Special Leaves &amp; Provisions</b></p>	<p>Differently Abled employees shall be governed by rules of leave as is applicable in Max Life.</p> <p>Special Leave (up to 30 days) may be provided on submission of necessary medical documents. The special leave can be extended on need basis and is subject to approval from Head – HR</p> <p>All other policies of Max Life as applicable to other employees shall apply to the Differently Abled employees as well.</p> <p><b>Provisions for assistive devices &amp; barrier free accessibility:</b></p> <ul style="list-style-type: none"> <li>• Wheelchair</li> <li>• Ramp with Rails</li> <li>• Life with Braille Signage and audio prompts</li> <li>• Accessible Washrooms</li> <li>• Reserved Parking for PwD's</li> <li>• Broad Access Pathways</li> <li>• Doctors Room</li> <li>• Drinking Water Stations and Pantry boys to serve water when needed</li> <li>• Accessibility software enablement on screen like magnifier, audio prompts, read aloud function etc.</li> </ul> <p><b>Website Accessibility:</b></p> <ul style="list-style-type: none"> <li>• Website responsive to all Windows Accessibility features such as screen magnifier and audio prompts</li> <li>• Read aloud feature is enabled on website.</li> <li>• The Help Chat Bot (MILI) on website has audio input as well as text input feature.</li> </ul> <p>It is Max Life's continuous endeavor to ensure that all our documents, communication and information technology systems adhere to the accessibility standards. Any employee facing accessibility challenges can reach out to their manager or write to the Liaison Officer.</p> <p>Max Life will endeavor to make company events and meetings inclusive by ensuring that these are conducted at accessible venues with a provision of reasonable accommodation being available to employees with disabilities.</p> <p>Work Place adjustments/alterations shall be made on case-to-case basis to help one overcome obstacles caused by a health condition or disability, such that the employees are able to carry out their duties effectively. Adjustments can be temporary, as part of rehabilitation, or permanent.</p>
<p><b>Roles and responsibilities of Liaison Officer</b></p>	<p>The HR department has appointed <b>Richa Singh (Vice President-Human Resources)</b> as the Liaison Officer, who shall be responsible for:</p> <p><b>Address:</b> Max Life Insurance, 12th Floor, DLF Square Building, Jacaranda Marg, DLF City, Phase II, Gurugram – 122008</p> <p><b>Email ID:</b> <a href="mailto:beinclusivethinkdiversity@maxlifeinsurance.com">beinclusivethinkdiversity@maxlifeinsurance.com</a></p> <p><b>Phone No.:</b> +91 - 124 - 4121500 (Ext: 1036)</p> <p><b>Roles:</b></p> <ol style="list-style-type: none"> <li>a) implementing the Policy and ensuring compliance with the policy.</li> <li>b) overseeing the provision of required facilities/amenities including the process of recruitment for Differently Abled persons.</li> <li>c) collecting and maintaining data as per the Act.</li> </ol> <p>The record maintenance is tracked through a monitoring software (COMS).</p>

<p><b>Maintenance of Records</b></p>	<p>Max Life will collect and maintain data regarding employees with disabilities as per the Act and Rules. The information that an employee shares about her/his disability will be kept confidential. Exceptions to the confidentiality clause:</p> <ol style="list-style-type: none"> <li>Managers/Supervisors may be given information about an employee’s disability for allowing/providing any accommodations.</li> <li>Security personnel may be given information about an employee’s disability so as to facilitate obtaining any necessary support during an emergency</li> <li>Government officials who are investigating the compliance with the Act may be given information about an employee’s disability.</li> </ol> <p>Records containing the following particulars shall be maintained by the organization-</p> <ul style="list-style-type: none"> <li>The number of persons with disabilities who are employed</li> <li>The date from when they are employed</li> <li>The name, gender and address of persons with disabilities</li> <li>The nature of disability of such persons</li> <li>The nature of work being rendered by such employed person with disability</li> <li>The kind of facilities being provided to such persons with disabilities.</li> </ul>
<p><b>Validity</b></p>	<p>The policy would be reviewed every two years for any modifications/improvements in the light of any statutory requirements</p>
<p><b>Grievance Redressal</b></p>	<p>Any person having any grievance regarding discrimination on the ground of disability may raise a concern on the following mail ID: <a href="mailto:myvoice@maxlifeinsurance.com">myvoice@maxlifeinsurance.com</a></p>
<p><b>Amendments</b></p>	<p>Max Life reserves the right to amend, modify and interpret appropriately any or all clauses mentioned above depending upon market practices, business exigencies or compliance with relevant statutory guidelines.</p>
<p><b>Policy Owner &amp; SPOC</b></p>	<p>Shailesh Singh (Senior Director &amp; Chief People Officer) Priyanka Mitra (EVP &amp; Head HR Distribution and DEI)</p>
<p><b>Approval Matrix</b></p>	<p>Any other exception over and above the stated policy to be approved by Chief People Officer</p>
<p><b>Consequence of Breach</b></p>	<p>As per the Employee Disciplinary Action Policy</p>