

# DIVERSITY, EQUITY & INCLUSION POLICY

<b>Policy Ownership &amp; Management</b>		
<b>Issuer</b>	<b>Owner</b>	<b>Approver</b>
HRD & ES	Head - HRD & ES	Director Finance, Group CFO

<b>Version</b>	<b>Issued Date</b>	<b>Effective From Date</b>	<b>Brief description of Change / Review</b>
1.	01-01-2023	01-01-2023	First release
2.	01-05-2024	01-05-2024	Revised based on ESG disclosure alignment
3.	01-02-2026	01-02-2026	Revised clause added

## **1. Purpose**

Oberoi Realty Limited (ORL) is committed to creating an inclusive and diverse workplace and leveraging the power of different abilities for sustainable competitive advantage, economic growth, and social progress. We aim to foster a workplace culture that supports holistic growth of our workplace, without any barriers and enables them to realize their full potential.

- To create and foster an open culture of inclusion for all its stakeholders.
- To create an environment which has zero tolerance for discrimination.
- Employ best practices in regard to Diversity, Equity and Inclusion (DEI) initiatives, benchmarked with globally reputed companies and institutes.
- Provide an environment of equality and respect for all stakeholders.
- To ensure ORL continues to be an employer for all diversity groups- gender identity, physical disability, caste, race, ethnicity, nationality, creed, colour, religion, marital status, age, sexual orientation and expression, medical condition, language, and any other aspects as applicable.
- ORL shall ensure zero tolerance for discrimination against any stakeholder on the grounds of HIV status, past or present HIV-related illness, or any other chronic or communicable health condition. ORL will maintain strict confidentiality of any health-related information including HIV status and ensure that no individual is denied employment, access to services, participation in workplace activities, training opportunities, career progression, or any workplace benefit on the basis of their HIV status or any other medical condition.
- Operate in accordance with all relevant legislation in the jurisdictions we operate in, including the Equality Act 2010.
- Ensure fairness and avoid unlawful discrimination in matters including remuneration, employment terms and conditions, promotions, training and development opportunities.
- Promptly and fairly deal with complaints of harassment, bullying, or unlawful discrimination by employees, customers, suppliers and other stakeholders.
- Review the ORL employment policies and practices to promote fairness and address gender bias and underlying barriers to achieving gender balance.
- Build leadership capability by providing equal opportunities for training and development of staff, as required, to harness their full potential.

## **2. Scope**

This policy applies to all stakeholders. 'Stakeholders' for the purposes of this policy shall include all employees (whether permanent, fixed term or temporary), business partners, vendors, suppliers, consultants, contractual staff, seconded staff, trainees, apprentices and any other person / entity acting for and on behalf of ORL.

### **3. Diversity, Equity and Inclusion Philosophy**

- ORL believes in embracing varied cultures and backgrounds. ORL's aim has always been to ultimately create an everlasting workplace culture where teams of mixed gender, ethnicity, regional affiliations, physical ability, age and orientation are representative of a variety of perspectives and experiences.
- ORL is committed to providing equal opportunities to all individuals and is intolerant towards discrimination and / or harassment based on race, sex, nationality, ethnicity, origin, religion, age, disability, sexual orientation, gender identification and expression (including transgender identity), political opinion, medical condition, language as protected by applicable laws.
- Any medical condition of an existing employee will not be the cause for that employee to be treated differently than other employees with respect to the application of ORL's policies, health benefits and performance standards.
- ORL respects the privacy of every individual and ensures utmost secrecy and confidentiality of information / concerns in relation to disability/ sexuality/ gender identity, or any other personal information shared with it by its employees (or potential candidates). However, if any disclosure is mandated under law, then any such disclosure will be handled with utmost confidentiality and in accordance with applicable laws.
- ORL fosters understanding of gender identity amongst its employees. Selection of qualified applicants is based on merit, considering the job requirements, individual's suitability, ability, competence and trainability to execute the role, and will not be subject to the gender identity of an individual.
- The basis for recruitment, development, training, compensation and advancement of employees at ORL shall solely be on the basis of qualifications, performance, skills, experience, expertise, potential and discipline.
- ORL follows the principle of equal pay and terms of employment (including benefits, training, promotions, performance reviews, transfers, exits, etc.) without any bias. ORL believes that all its employees should receive equal pay where they are carrying out similar work, work rated as equivalent or work of equal value.
- All stakeholders of ORL shall be always treated with dignity and respect. ORL inculcates awareness amongst its stakeholders through educational sessions and forming internal groups to promote diversity amongst employees.
- ORL 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.

#### **4. Compliance**

- Appropriate disciplinary/ legal action will be taken against any employee / personnel who violates this policy. Based upon the seriousness of the offense, disciplinary action against an employee may include verbal or written reprimand, warning, suspension or termination of employment.
- No reprisal or 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 an employee may be subject to disciplinary action.

#### **5. Grievance Redressal**

- We have constituted DEI Council to provide a structured approach to address DEI issues effectively and investigate complaints in reference to violation against this policy.
- Any employee who has been subjected to and/or is a victim of violation under this policy and wishes to lodge a complaint in writing to DEI council, can do so by sending an e-mail to [deicouncil@oberoirealty.com](mailto:deicouncil@oberoirealty.com)
- The DEI council will undertake a careful and objective study of the case and make its recommendations. The DEI Council shall follow the principles of natural justice and parties will be given an opportunity of being heard by the said Council and thereafter also be allowed to make their representations pursuant to the findings of the said Council. This mechanism will ensure confidentiality, assurance and protection for all. The council will ensure protection of the complainant against any retaliation under the grievance redressal mechanism.
- The role of the Council is to establish decision-making authority and processes within the DEI Council to drive transparency, commitment to goals, and trust with leadership and the wider organization. The council shall also foster effective DEI communication channels through regular internal communication, feedback mechanisms, events, and training initiatives.

#### **6. Frequency of review of Policy**

The policy shall be reviewed on an annual basis (or any frequency as it may deem fit) to maintain the efficacy of the engagement with our internal and external stakeholders.

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