

LUMINA DATAMATICS LIMITED
EQUAL EMPLOYMENT, DIVERSITY & INCLUSION POLICY

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| Title | Equal Employment, Diversity and Inclusion Policy | | |
| Department | Human Resource | Version | 1.0 |
| Date of Effect | January 18, 2023 | Date of Next Review | March 31, 2026 |

1. Introduction:

This document summarizes the Equal Employment, Diversity & Inclusion policy (“hereinafter referred to as “**Policy**”) of Lumina Datamatics Limited (hereafter referred to as “the Company/ Lumina Datamatics”). The Company promotes and supports a diverse workforce at all levels of the Company across geographies. The Company believes that Diversity and Inclusivity (D&I) at the workplace is an instrument for growth. The Company values and celebrates the uniqueness of every individual by fostering a culture that promotes workforce diversity, flexibility and inclusion.

The Company considers its Employees to be its most important resource and is committed to treating all associates with dignity and respect. In each location where the Company conducts business, it complies with local laws governing the employment relationship. Additionally, the Company is committed to recognizing the following rights and principles throughout its global organization.

2. Policy Statement:

The Company considers its employees a pivotal part and is committed to treating all associates with dignity and respect. The Company is dedicated to creating a working environment with the highest degree of ethical and virtuous work practices by ensuring fairness at every step of the employee life-cycle; to build a progressive and diverse workforce. The Company holds in high regard the guidelines laid down under the international conventions and laws relating to slavery. It aims to maintain a safe and harmonious working environment for each individual, irrespective of work, designation, ethnicity, race, caste, nationality, gender, religion, and other parameters.

The Company is committed to delivering value through equality and to nurture and promote human diversity across its operations. We consider diversity to be an important driver of innovation, productivity, and growth.

We promote an inclusive work culture of creating a supportive professional environment that promotes trust, empathy, and mutual respect.

3. Objective:

The objective of this Policy is to ensure that the Employees act with integrity and treat others fairly and with respect, irrespective of their differences. The Company aims to provide its employees with an environment of equality and respect for all employees and contractors and not discriminating against any individuals on the basis of their gender, age, disability, ethnicity, sexual orientation, family status, religious beliefs and abilities.

The Company is continuously striving to be an equitable workplace promoting pay parity, skill balancing, inclusive culture and of diverse demography.

4. Scope:

This policy shall apply to all full-time employees and employees engaged through contractors of the Company and its subsidiaries.

5. Diversity & Inclusion Scope:

The Company believes that creating a work environment that enables us to attract, retain and fully engage diverse talents leads to enhanced innovation and creativity in our service and a better understanding of our diverse client base. The Company ensures that its Personnel or potential hires are not unlawfully discriminated against, directly or indirectly, as a result of their colour, creed, race, nationality, ethnic or national origin, connections with a national minority, marital or civil partnership status, pregnancy, age, disability, religion, or similar philosophical belief, sexual orientation, gender or gender reassignment or trade union membership etc. and never tolerate harassment in any form.

The Company is committed to providing a diverse workforce and inclusive workplace by:

1. Creating a safe and secure work environment that is free from any discrimination, which includes but is not limited to our policy of zero tolerance to sexual harassment.
2. Having a robust framework to attract, engage and retain the talent of all ages, genders, languages, ethnicities, nationalities and abilities.
3. Building and fostering Diversity of:
 - i. **Gender** - Focused initiatives that help us attract and retain talented women professionals through efforts spanning workplace practices, flexi-time practices, safe travelling, zero tolerance on sexual harassment, and other support geared to facilitate smooth onboarding / re- absorption of women after career break.
 - ii. **Differently-abled-** Enable equal opportunities for differently-abled professionals (also known as Persons with Disabilities / Divyang) with facilities aimed at an inclusive approach and ensuring equal opportunity. We have a deep-rooted commitment to

empowering our employees to reach their full potential by working to ensure a truly diverse, accessible, equitable and inclusive environment. We offer all candidates an integrated balance of challenging professional work experience, exposure to global projects and the opportunity to make an immediate impact. We're continually focused on finding better ways to run our business that include developing more inclusive experiences and systems to enable people with disabilities to contribute and succeed.

- iii. **Culture-** Programs, policies and initiatives to promote cultural acclimatization of associates & inclusion across all countries through localization of talent, policies, learning interventions on cultural integration, cultural sensitivity training and other support.
- iv. **LGBTQ+ -** We are inclusive and supportive to colleagues across the broad spectrum of sexuality and gender identity, orientation.
- v. **Board of Directors:** Board appointments are based on merit that complements and expands the skills, experience, expertise of the Board as a whole, taking into account knowledge, professional experience, qualifications, gender, age, cultural, educational background, statutory / regulatory requirement and any other factors that might be relevant and applicable from time to time for it to function effectively.

6. Human Rights:

The Company is committed to compliance with the requirements of all applicable employment, labour, and human rights laws to ensure fair and ethical employment practices are followed. We demonstrate our commitment to our employment practices, including our non-discrimination, minimum age requirement policies, and through our policies on health, safety, and security for our employees. Our goal is to conduct business with those who share our commitment to these same principles. We reject any form of slavery, forced or child labour. In line with this philosophy, the Company does not employ people below the age of 18 years. The Company follows the 'Law of the Land' to ensure that the local human rights are promoted and respected at the workplace.

The Company recognizes the legal obligations we have towards our employees, clients, suppliers, competitors and the community as a whole. Our reputation and brand, together with the trust and confidence our eco- business system has in us, is one of our most vital assets. The protection of our reputation is fundamentally important to us. Therefore, any breach of this policy by our people, suppliers, subcontractors, vendors, etc., results in disciplinary and legal action.

7. Corporate Governance Framework:

We operate within a corporate governance framework that is underpinned by our vision and values, which aim at securing the human life of all individual Employees. A key function of our corporate governance framework is the identification, management and mitigation of any risks meted out to the Employees under the current working environment. The Company is dedicated to creating a fair and transparent work environment with mutual respect for all.

The corporate governance framework followed by the Company is well established and externally benchmarked. Policies such as the Code of Conduct & Ethics, Prevention of Sexual Harassment Policy and Whistle Blower Policy are available for employees, investors, suppliers, clients and other stakeholders. It also focuses on setting up a solid value-based working atmosphere within the organization with zero tolerance to issues violating human rights aspects

8. Failure to Comply:

Failure to comply with the provisions of this policy will be considered as violation of policy and will be subject to disciplinary action, at the sole discretion of the Company, which may even extend to termination of services.

9. Reporting inappropriate Conduct:

- If any employee believes that they or another individual has been treated unfairly or has been discriminated against on account of any of the parameters mentioned in this policy or its intent, the employee is urged to bring this to the notice.
- All reported incidents will be investigated with an effort to keep the source of the report confidential, with the disclosure of information as appropriate to facilitate the investigation or resolution of the matter.
- Lumina Datamatics encourages employees to report in good faith any possible violation of this Policy.
- The organization will not tolerate threats or acts of retaliation of any kind against any individuals because they report conduct reasonably believed to violate this policy or in good faith provide information in connection with a report or investigation of any such conduct.
- Any employee found to have exhibited any inappropriate conduct or behaviour against others will be liable to disciplinary action.

10. General

- The organization reserves the right to interpret the meaning of this policy, and such interpretation will be final and binding upon all employees.
- The organization reserves its right to withdraw this policy without assigning any reason using its sole discretion, which will be binding on all employees

11. Policy Review and Amendments:

The Board will constantly review, and if found essential, may amend this policy from time to time, so that the policy remains compliant with applicable legal requirements.

Approved by
For and on behalf of Board of Directors

Sd/-
**Sameer Kanodia Managing
Director & CEO**