Magma General Insurance Limited
(erstwhile Magma HDI General Insurance Company Ltd.)

This document states that Magma General Insurance Limited is an Equal Opportunity employer.

Policy on Equal Opportunity & Non – Discrimination

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Approval Date – 21-July-25

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Approved By – Board of Directors

Polic Owner – Human Resource Department

Prepared By – Head- TA

Reviewed By – Chief of Staff & Head – Legal & CCO

This document is confidential in nature and supersedes all policy on Equal Opportunity & Non-Discrimination in the Company and should be read in conjunction with the most recent policies and procedures documented and held on file.

Base Document/ Governing Guideline/Policy	:	Right to Persons with Disabilities Act, 2016 and Rules thereto; Transgender Persons (Protection of Rights) Act, 2019 and Rules thereto
Initial Document Prepared by	:	Head - TA
Functional aspects checked by	:	Chief of Staff
Legal aspects checked by	:	Head – Legal & CCO

Policy on Equal Opportunity and Non-Discrimination

Magma General Insurance Limited

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1. Purpose & Policy Statement:

1.1 Magma General Insurance Limited ("the Company") is an equal opportunity employer and recognizes that each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices.

1.2 The Company is committed to provide a safe, diverse, and comfortable workplace and to maintain progressive work environment. Magma complies with all applicable laws with regard to non-discrimination at the workplace and providing equal opportunities to all its employees and to all eligible applicants for employment in the Company.

1.3 This Policy on Equal Opportunity and Non-Discrimination ("Policy") states the internal policy of the Company for non-discrimination at the workplace and equal opportunities during recruitment and employment.

1.4 It is the responsibility of all those connected with the Company to comply with this Policy.

2. Scope:

2.1 Non-discrimination

(a) The Company will not discriminate and prohibits any discrimination at the workplace.

(b) Any person who believes himself or herself to have been subjected to Discrimination is encouraged to bring the matter to the attention of the Complaints Officer/ Internal Committee.

(c) The Company shall not discriminate against any Transgender person in any matter relating to employment or occupation including, but not limited to, recruitment, promotion and other related issue. Discrimination shall include unfair treatment in or in relation to as well as denial of, denial of access to, or termination from employment or occupation.

(d) Rights of Person with Disabilities

In accordance with the provisions of the Rights of Persons with Disabilities Act, 2016 and Rights of Persons with Disabilities Rules, 2017 (hereinafter jointly referred to as "**PWD Laws**"), the Company shall ensure:

(i) That the work environment is free from any discrimination against Persons with Disabilities.

(ii) That facilities and amenities are provided to the Persons with Disabilities to enable them to effectively discharge their duties in the Company.

(iii) That suitable post may be defined for Persons with Disabilities in the Company

(iv) That the process for manner of selection of Persons with Disabilities for various posts, post-recruitment and pre-promotion training, preference in transfer and posting, special leave, preference in allotment of residential accommodation if any, and other facilities are recorded and followed.

(v) the provision of assistive devices, barrier-free accessibility and other provisions for Persons with Disabilities.

(vi) The Head TA is appointed as liaison officer to look after the recruitment of Persons with Disabilities and provisions of

facilities and amenities for such employees.

(vii) To maintain records containing the following particulars namely:

(a) the number of Persons with Disabilities who are employed and the date from when they are employed;

(b) the name, gender and address of Persons with Disabilities;

(c) the nature of disability of such persons;

(d) the nature of work being rendered by such employed Person with Disability; and

(e) the kind of facilities being provided to such Persons with Disabilities.

(viii) To produce for inspection on demand, records maintained under the PWD Laws, to the authorities under PWD Laws and to supply such information which may be required for the purpose of ascertaining whether the provisions have been complied with.

(ix) To register a copy of this Policy with the Chief Commissioner or the State Commissioner, as the case may be.

(x) In case the Chief of Staff / internal committee/ CEO/ complaints officer receives a complaint from an aggrieved persons regarding discrimination on the ground of disability, he/ she shall:

(a) Initiate action in accordance with the provisions of the PWD Laws; or

(b) Inform the aggrieved person in writing as to how the impugned act or omission is a proportionate means of achieving a legitimate aim.

(xi) To comply with the following standards relating to physical environment, transport and information and communication technology, namely :-

(a) Standard for public buildings as specified in the Harmonized Guidelines and Space Standards for Barrier Free Built Environment for Persons with Disabilities and Elderly Persons as issued by the Government of India, Ministry of Urban Development in March, 2016;

(b) Documents placed on websites are in Electronic Publication (ePUB) or Optical Character Reader (OCR) based pdf format:

(e) Rights of Transgenders

In accordance with the provisions of The Transgender Persons (Protection Of Rights) Act, 2019 and Transgender Persons (Protection of Rights) Rules, 2020. The Company shall implement all measures for providing a safe working environment and to ensure:

(i) that no Transgender person is discriminated in any matter relating to employment including, but not limited to, infrastructure adjustments, recruitment, employment benefits, promotion and other related issues;

(ii) The Company shall provide equal opportunities to Transgenders in terms of:

(a) infrastructural facilities (such as unisex toilets), safety and security (transportation and guards) and other amenities (such as hygiene products) to the Transgender persons so as to enable them to effectively discharge their duties.

(iii) all rules and regulations of the company regarding service conditions of employees shall apply to Transgenders in equal measure.

(iv) confidentiality of the gender identity of the employees.

2.2 the Company shall display this Policy on its website, and/ or, at conspicuous places in its premises.

3. Key Definitions:

(a) **Company:** Magma General Insurance Limited and its offices across India.

(b) **Person with Disability:** means a person with long term physical, mental, intellectual or sensory impairment which, in interaction with barriers, hinders his/ her full and effective participation in society equally with others and the meaning of disability shall be construed accordingly;

(c) **Discrimination:** means any distinction, exclusion, restriction on the basis of disability/ gender 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

(d) **Internal Committee:** Committee members. **Chief Investment Officer, Chief Compliance Officer, Chief Risk Officer and Chief of Staff**

(e) **Workplace:** Workplace includes any office, branch, or unit, which is established, owned, or controlled by theCompany and includes any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

(f) **"Transgender"** 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 such other therapy), person with intersex variations, genderqueer and person having such socio-cultural identities as *kinner, hijra, aravani* and *jogta*.

The definitions are not exhaustive but suggestive and shall have the similar meaning as provided under the governing law.

4. Roles & Responsibilities:

4.1 Chief of Staff **(COS):**

The Chief of Staff of the Company will be responsible for the dissemination of the Policy.

The Complaints Officer (Chief Of staff) shall be appointed in this behalf who shall look after the grievances reported hereunder.

4.2 Managers & Supervisors:

(i) All people managers must demonstrate equal and inclusive treatment of employees and ensure they show values and behaviors that create an environment in which others feel respected and included.

(ii) All people managers are responsible for implementing this Policy within each division/ department/ team.

4.3 Human Resources (HR) Department:

- The HR department is responsible for overall compliance and shall maintain personnel records, forms in compliance with applicable laws, Rules and regulations.
- Human resources representatives have the following additional responsibilities:

(a) To provide advice and address grievances relating to the employment of Persons with Disabilities and/or any other complaints regarding discrimination in any other form by any job applicant/employee

(b) Assist the Complaints Officer and the Internal Committee in dealing with the complaints received.

4.4 Employees:

- All employees to comply with this Policy and all the applicable laws and regulations. Compliance is required whenever an employee is acting in their capacity as a representative of the Company.

5. Process:

5.1 Communication of the Policy

Policy is available on HRMS to all employees and on the Company's corporate website. It is also available at all conspicuous places in branches and head office.

5.2 Internal Employee Training

The Company may Provide trainings to all employees, including managers on non-discrimination and equal opportunity

6. Operational Guidance

6.1 Every employee is responsible for maintaining a Workplace that is free from unlawful discrimination, or retaliation. Any employee who violates this Policy may be subject to disciplinary action, with penalties up to and including termination of employment.

6.2 Managers are responsible for understanding and communicating this Policy and identifying and addressing potential violations appropriately

6.3 All employment-related decisions must be made in compliance with applicable laws prohibiting discrimination in employment.

7. Redressal Mechanism:

7.1 If an employee, feels that they have been treated in a manner that is contrary to this Policy, such employee should promptly report their concerns to the Complaints Officer or their Human Resources Business Partner (HRBP)

7.2 The concern / complaint will be handled with the applicable code of conduct and disciplinary rules of the Company and would be governed by the decision taken by the Internal Committee of the organization

7.3 For any person, who is not employee of the company, they can report concerns to the COS office

7.4 If a party to a complaint does not agree with its resolution, that party can appeal to the CEO of the Company

7.5 All such complaints can be written directly to humanresources@magmainsurance.com

8. Confidentiality

8.1 The Company, is committed to maintain complete confidentiality throughout the investigative process and prohibits retaliation against any individual who reports discrimination or participates in an investigation of such reports.

8.2 False and malicious complaints of discrimination or retaliation may be subject of appropriate disciplinary action

8.3 All concerns will be addressed, and appropriate corrective action will be taken as necessary.

9. Miscellaneous

9.1 Nothing contained in this Policy shall prejudice any right available to any person/employee.

9.2 The Company reserves the right to modify and, or review the provisions of this Policy.

9.3 If any provision of the Policy is held to be illegal or invalid or amended for any reason, the illegality or invalidity shall not affect the remaining provisions hereof, but such provision shall be fully severable, and the Policy shall be construed and enforced as if the illegal or invalid provision had never been included herein.

9.4 In case of inconsistency between this Policy and Code of Conduct and Disciplinary Rules of the Company, the later shall take precedence.

10. Review Timelines:

10.1 The Policy will be reviewed annually or earlier in case of any changes in the applicable guidelines.

11. Change Control Record

Version No.	Change Request by	Memorandum of Change	Approval Date
1.0	Mr. M A Abedin and Ms. Smita Jain	No Change	25.07.2023

Version No.	Change Request by	Memorandum of Change	Approval Date
2.0	Mr. Anilkumar Satyavarpu and Ms. Soma Gambhir	Aligned as per the RPwD Act and Transgender Act	19.07.2024

Version No.	Change Request by	Memorandum of Change	Approval Date
3.0	Head – TA & Chief of Staff	Aspect enhancement & improvisation	21-July-25