



SARDA ENERGY & MINERALS LIMITED

Regd. Off: 73-A, Central Avenue, Nagpur (MH.) 440018
Ph: +91-712-2722407; Fax: +91-712-2722107 Email: cs@seml.co.in
URL: www.seml.co.in CIN: L27100MH1973PLC016617

Equal Opportunity Policy

1. Preamble

Sarda Energy & Minerals Limited ("SEML" or "the Company") is committed to fostering a workplace culture that upholds fairness, dignity, and respect for all individuals. The Company believes that equal opportunity and diversity are fundamental to building a resilient, inclusive, and high-performing organisation.

In alignment with the provisions of the Rights of Persons with Disabilities Act, 2016 ("the Act"), this Policy seeks to institutionalise non-discriminatory practices across all employment-related decisions and processes. SEML endeavours to provide equitable access to employment opportunities with regards to race, colour, religion, sex, sexual orientation, gender identity or expression, pregnancy, age, national origin, disability status, genetic information, protected veteran status, or any other characteristic protected by law and a supportive work environment for individuals from diverse backgrounds, including Persons with Disabilities (PwDs) and transgender persons.

The Company strictly prohibits discrimination, exclusion, or harassment on any grounds protected under applicable laws and is committed to ensuring equal treatment in all aspects of employment.

2. Effective Date

This Policy comes into effect from 23.05.2026.

3. Scope of Policy

This Policy applies to:

- a) All current and prospective employees of SEML;
- b) Contractual personnel and consultants engaged by the Company; and
- c) Visitors, service providers, and other third parties present at SEML's offices or operational locations.

The Policy is applicable across all locations and functions of the Company.

4. Definitions

For the purpose of this Policy:

- i) **Act** means the Rights of Persons with Disabilities Act, 2016.
- ii) **Company / SEML** means Sarda Energy & Minerals Ltd.
- iii) **Policy** means this Equal Opportunity Policy.
- iv) **Person with Disability** shall have the meaning assigned under the Act, i.e., a person with a long-term physical, mental, intellectual, or sensory impairment which, in interaction with barriers, hinders full and effective participation in society on an equal basis with others.
- v) **Discrimination** refers to any distinction, exclusion, restriction, or denial of reasonable accommodation on the basis of disability or any other protected characteristic, which has



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the effect of impairing equal enjoyment of rights and opportunities.

- vi) **Reasonable Accommodation** means necessary and appropriate modifications or adjustments, without imposing a disproportionate or undue burden, to enable Persons with Disabilities to perform their roles effectively.

5 Coverage

- a) Recruitment and selection
 - b) Terms of employment and confirmation
 - c) Training and skill development
 - d) Performance evaluation and career progression
 - e) Transfers and postings
 - f) Compensation, benefits, and welfare measures
 - g) Workplace conditions and facilities
- Disciplinary action, termination, and separation

This Policy also governs the engagement and treatment of third-party personnel, agency staff, and contractors operating on SEML premises or on behalf of the Company.

6 Commitment

SEML is committed to maintaining an employment environment free from discrimination and harassment. Employment-related decisions shall be based solely on merit, qualifications, experience, and the inherent requirements of the role.

Discrimination on grounds such as age, gender, disability, medical condition, religion, caste, ethnicity, nationality, sexual orientation, gender identity, political belief, or any other characteristic unrelated to job performance is strictly prohibited and may attract disciplinary action in accordance with the Company's Code of Conduct.

The Company shall also respect the privacy and confidentiality of employees' personal information, including gender identity, except where disclosure is required by law or necessary to provide appropriate support.

7 Selection Process

SEML shall follow a transparent and merit-based recruitment process. Selection criteria shall be periodically reviewed to ensure they do not result in direct or indirect discrimination, particularly against Persons with Disabilities or transgender persons.

Where requested and feasible, the Company may provide application forms or recruitment-related information in alternative formats to facilitate accessibility.

8 Facilities and Amenities

SEML shall endeavour to create a workplace that is accessible, inclusive, and supportive of diverse needs.



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9 Physical infrastructure

The Company shall, as far as practicable:

- a) Provide barrier-free access at its offices and operational locations;
- b) Ensure accessibility of essential facilities such as workstations, restrooms, and common areas; and
- c) Facilitate infrastructure improvements in line with accessibility standards prescribed under the Act.

Unisex restroom facilities may be provided where feasible to support transgender employees. Assistive devices or workplace adjustments may be considered on a case-by-case basis.

10 Information, Communication & Technology

Employees facing accessibility challenges related to information systems, digital platforms, or communication tools may report the same to the Head – Human Resources for appropriate action.

11 Transportation System

Where transportation facilities are provided by the Company, SEML shall endeavour to ensure compliance with applicable accessibility standards.

12 Special Leave

Subject to operational requirements, the Company may consider granting special leave to Persons with Disabilities where such leave is necessitated due to disability-related reasons.

13 Reasonable Accommodation

SEML may provide reasonable accommodation to Persons with Disabilities to enable effective performance of job responsibilities. The nature of such accommodation shall be determined on a case-to-case basis, taking into account functional requirements and feasibility.

14 Training and Career Development

The Company shall endeavour to ensure that training programmes, learning materials, and career development initiatives are inclusive and accessible. Where appropriate, specific needs may be considered in decisions relating to transfers, postings, or residential accommodation.

15 Complaints

Any employee who believes they have been subjected to discrimination, harassment, or unfair treatment may attempt informal resolution where appropriate or raise a formal complaint through the Company's grievance redressal mechanism.

All complaints shall be handled promptly, sensitively, and with due confidentiality. Retaliation against any individual for raising concerns under this Policy is strictly prohibited.

16 Grievance Redressal & Harassment Prevention

In accordance with the Act, SEML shall designate Head – Human Resources responsible for facilitating the implementation of this Policy and supporting an inclusive workplace.

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- 17 **Head - Human Resources** – shall be responsible for
- a) Promoting accessibility and inclusion within the workplace;
 - b) Assisting employees requiring reasonable accommodation;
 - c) Creating awareness about rights and responsibilities under this Policy; and
 - d) Supporting initiatives to prevent discrimination and harassment.
- 18 **Responsibility and Administration of the Policy**
- i) The Board of Directors of SEML shall have overall oversight of this Policy.
 - ii) The Human Resources department shall be responsible for:
 - a) Day-to-day administration and monitoring of the Policy;
 - b) Communication and awareness initiatives; and
 - c) Advising managers on equal opportunity and diversity-related matters.
 - iii) Department heads and managers are expected to:
 - a) Implement this Policy within their respective teams;
 - b) Lead by example; and
 - c) Promote respectful and inclusive behaviour at the workplace.

Appropriate training on equal opportunity and inclusive practices may be provided to managers and employees from time to time.

19 **Review and Amendment**

All managers shall set an appropriate standard of behaviour, lead by example, and ensure that those they manage to adhere to the policy and promote our aims and objectives with regard to equal opportunities. Managers will be given appropriate training on equal opportunities awareness and equal opportunities recruitment and selection best practices. The Human Resources Department has overall responsibility for equal opportunities training.

No 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 employee may be subject to disciplinary action.