



# DREAMPLUG TECHNOLOGIES PRIVATE LIMITED

## ANTI-DISCRIMINATION AND EQUAL OPPORTUNITY POLICY

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### 1. OVERVIEW

At CRED, we understand the importance of diversity and inclusion in the workforce and are committed to providing equal opportunities to candidates and employees without any discrimination on the basis of gender, disability, race, colour, caste, religion, nationality, age, sexual orientation, marital status and/or any other legally protected status. We intend to create an inclusive workplace based on respect, trust, and collaboration of all the employees.



## 2. POLICY STATEMENT

This Anti-Discrimination and Equal Opportunity Policy (“**Policy**”) sets forth a framework to provide equal opportunities to all Employee’s or prospective Employees at CRED and create an inclusive work environment encompassing all sections of the society including Persons with Disabilities and Transgender Person as detailed in this Policy.

Through this policy:

- a) We aim to address the specific needs of the Persons with Disabilities and Transgender Persons, at the Workplace, in order to enable them to excel in their career while contributing towards the growth of CRED.
- b) We aim to eliminate all forms of discrimination including direct discrimination and indirect discrimination and provide for the grievance redressal mechanism for complaints of discrimination against the Transgender Persons or Persons with Disabilities.
- c) We aim to raise awareness and sensitize our employees and other persons about the importance of diversity and inclusion at the workplace.
- d) We strive to maintain a working environment that is conducive for specially abled employees.

However, this Policy does not anticipate every need of a Transgender Person or a Person with Disability that might occur at any given point of time and hence, the need of each person shall be assessed on a case-to-case basis and the goal is to protect the interests and ensure the comfort of a such person while maximizing their integration at CRED. This Policy is subject to applicable laws, qualifications, and merit of the individuals concerned.

## 3. SCOPE

This Policy extends to benefit all the persons including job applicants, full-time/part-time employees, interns, trainees, any contractual employees and other persons who shall be connected with CRED in the relevant capacity. Further, this Policy applies to all aspects of employment including but not limited to recruitment, training, working conditions, salaries, transfers, promotions and employee benefits.

This Policy shall be available to and applicable on all Employees of CRED via all the normal communication channels or portals used within the day to day business operations.

## 4. DEFINITIONS

For the purpose of this Policy:

“**Complaints Officer**” shall mean Mr. Ayush Shukla;

“**CRED**” means Dreamplug Technologies Private Limited, along with all its subsidiaries or affiliates, across all the offices locations in India;

“**Discrimination**” in relation to:

- (a) a Transgender Person, shall refer to differential and/or unfair treatment of a transgender person on the basis of Gender Identity or Gender Expression or any other legally protected status; and
- (b) in relation to a Person with 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;

“**Employee**” means any person employed at CRED, for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent and shall include a co-worker, a contract worker, probationer, trainee, apprentice or by any such name.



“**Gender Expression**” shall refer to the external appearance/expression of a person’s gender identity through physical appearance, clothing choice and accessories etc. However, Gender Expression may or may not conform to a person’s Gender Identity;

“**Gender Identity**” shall refer to an individual’s self-identification as a man, woman, transgender or other identified category that may or may not correspond to a person’s sex assigned at birth or primary or secondary sex characteristics;

“**Person with Disability**” 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;

“**Private Information**” means any information about a person’s medical record, “Sex”, “gender”, “Gender Identity”, and “Gender Expression”.

“**Reasonable Accommodation**” means necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden in a particular case, to ensure to Persons with Disabilities, the enjoyment or exercise of rights equally with others;

“**RPwD Rules**” means Rights of Persons with Disabilities Rules, 2017;

“**RPwD Act**” means Rights of Persons with Disabilities Act, 2016;

“**Sex**” shall refer to a person’s biological status assigned at birth and is typically categorized as male, female, or intersex (i.e., atypical combinations of features that usually distinguish male from female);

“**Sexual Orientation**” shall refer to person’s sexual attraction to people of the same and/or other gender;

“**TP Act**” means Transgender Persons (Protection of Rights) Act, 2019;

“**TP Rules**” means Transgender Persons (Protection of Rights) Rules, 2020;

“**Transgender person**” shall refer to 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;

“**Transgender employee**” shall refer to the Employees of CRED who identify as Transgender Person(s); and

“**Workplace**” shall refer to the physical premises of offices of CRED;

The definitions of the term “gender”, “sex”, “Sexual Orientation” and “transgender person” here are not intended to label any person but rather to assist the employees and employer in understanding this Policy and their respective roles and responsibilities at the Workplace. Employees are neither restricted nor can be forced to identify themselves under the purview of these definitions.

## 5. GUIDELINES

### 5.1. Equal opportunity

- (a) CRED shall ensure that all employment decisions are solely made on the professional competence of the candidate and whether such candidate fits CRED’s requirement at the time of recruitment.
- (b) CRED shall ensure that equal opportunity is presented to persons alike in all all aspects of the employment relationship, including but not limited to hiring, promotions, training and development, compensation and benefits, and shall not discriminate in any manner against any employee or applicant.



- (c) CRED shall not discriminate against employee and shall also ensure that the work environment is free from any discrimination (against Person with Disability or Transgender Person or otherwise) and is inclusive for everyone alike.
- (d) CRED shall ensure that no opportunity is denied to Persons with Disabilities, merely on ground of the disability or to a Transgender Person merely on the ground of gender. Appropriate facilities, amenities and processes will be provided to Persons with Disabilities and Transgender Persons to enable them to effectively perform their job responsibilities.

## 5.2. Maintenance of records as per the RPwD Act

- (a) CRED shall collect and maintain data regarding Employees with disabilities in relation to their employment, facilities provided and other necessary information requirements, solely as per the RPWD Act and RPwD Rules.
- (b) The information and data collected and maintained shall be kept confidential and only be used in accordance with applicable laws.

## 5.3. Protection from intimidation

All Employees and applicants shall be protected from coercion, intimidation, interference, discrimination or retaliation for filing a complaint or assisting in an investigation under this Policy, in line with the applicable laws.

# 6. INCLUSIVE BENEFITS

## 6.1. Physical Infrastructure

CRED aims to ensure that its physical infrastructure (buildings, furniture, facilities and services in the building/campus and transportation) adheres to the accessibility standards as prescribed by the applicable laws and requirements for the Persons with Disabilities and Transgender Persons. Any Employee facing accessibility issues should report the same to the Complaints Officer.

## 6.2. Digital Infrastructure

CRED strives to ensure that all our documents, communication and information technology systems adhere to the accessibility standards as prescribed by the applicable laws. Any Employee facing accessibility challenges can reach [itsupport@cred.club](mailto:itsupport@cred.club) or write to the Complaints Officer.

## 6.3. Reasonable Accommodation

CRED shall make Reasonable Accommodations, whenever necessary, for qualified employees or job applicants, as per the applicable laws, and on a case to case basis. Employees or job applicants who require such Reasonable Accommodation should contact the respective Complaints Officer by providing the details of their requirements.

## 6.4. Dress Code

CRED does not have dress code that restricts any Employees' appearance on the basis of any Sex/gender. All employees, including the employees identifying as non-binary, are free to dress in a manner that affirms their Gender Identity and/or Gender Expression or comply with the dress code in a manner that suits them while adhering to the general standards of professional dress code/appearance.



## 6.5. Employee Benefits

CRED shall extend the benefits formulated for its Employees to all the Employees (including the Persons with Disabilities or transgender employees) and their partners, spouses, children, or other dependents of employees, irrespective of their physical/mental status or their Gender Identity/Gender Expression. The Company may, on its sole discretion, provide medical coverage/health insurance for sex reassignment surgery, hormonal treatment and other medical procedures designed for transgender employees. The Company may also, on its sole discretion, arrange for counselling and mental health support for every employee including the Persons with Disabilities or the transgender employees at the Workplace.

## 6.6. Pronouns

At CRED, every Employee including the transgender employees are entitled to be addressed by their preferred pronouns and name at the workplace. An employee is not required to obtain a certificate, court order or undergo a sex-reassignment procedure to be entitled to be addressed by their preferred pronouns and name at the workplace. Further, the employees are encouraged to mention their preferred nouns and/or name in their email or other official signatures or convey the same to their fellow employees and other stakeholders at the workplace.

## 6.7. Inclusive Language

At CRED, all Employees are required to use such language that may not raise any stereotype or show any unconscious bias towards any gender, race, age or body of any person. All employees shall use inclusive language in all formal/ informal, written/ verbal communications, documents and policies and to avoid the use of discriminatory language. Usage of discriminatory language by employees which may be derogatory or offensive to certain individuals based on their race, religion, sex, gender, colour, age, national origin and physical disability, is subject to strict disciplinary action.

## 6.8. Office Records

CRED may, on its sole discretion, allow an Employee's official record to reflect the preferred name and/or pronoun upon such request from the Employee. However, for certain types of official and regulatory records pertaining to the EPF, ESIC etc., the employee shall be required to change the name and/or pronoun legally before the same can be changed in CRED's official records.

## 6.9. Privacy & Confidentiality

Every employee is free to decide the time, the person and quantum of the Private Information they wish to share, or they may choose to even keep the same undisclosed unless it is legally required. An employee's Private Information may only be shared with the Employee's prior consent on a need-to-know basis. We also condemn the Employees from asking questions about any person's gender or any other Private Information, even at unofficial settings.

## 6.10. Restrooms

Every employee is allowed to use a safe and appropriate restroom facility that corresponds to their gender identity regardless of the sex assigned at birth. Further, CRED currently has unisex restrooms, and CRED shall also constantly endeavour to develop and expand the infrastructure as per the requirements.

## 6.11. Discrimination, Harassment and Bullying

CRED strives to maintain a safe, healthy, and productive work environment that is free from any form of harassment or discrimination from any person. A Complaints Officer has been appointed for timely and impartial resolution of any complaint/concern/reporting that may arise in this regard.



## 7. RESPONSIBILITY OF THE EMPLOYEES

Each Employee at CRED shall be responsible for respecting the choices, dignity and diversity of all the other Employees or external stakeholders of CRED. All employees are independently also urged to upgrade their awareness of any unconscious bias and collaborate effectively with each other.



## 8. BREACH OF POLICY

- 8.1. Any action of the employer, employees or other persons associated with the CRED that violates the provisions mentioned herein amounts to a breach of Policy and shall be subject to an action as per applicable law and CRED's code of conduct policy.
- 8.2. Any person who believes to have been subjected to adverse discrimination, or impermissible positive discrimination, is encouraged to bring the matter to the attention of the Complaints Officer at the earliest practical opportunity. All employees are also encouraged to report any incidents of violation of this policy in writing to the Complaints Officer.

## 9. GRIEVANCE REDRESSAL MECHANISM

- 9.1. The company has appointed Mr. Ayush Shukla as the Complaints Officer of CRED, for the purpose of this Policy.

For any complaints or reporting of incidents, Employees may reach out to the Complaints Officer at [complaintsofficer@cred.club](mailto:complaintsofficer@cred.club).

- 9.2. The Complaints Officer's responsibility shall be to address the complaints and grievances of all Transgender Persons or Persons with Disabilities or any other person under this Policy, as per the requirements applicable law.
- 9.3. The Complaints Officer shall provide the requisite support needed to realise the goals of an inclusive and accessible workplace and shall also be responsible for taking initiatives for the same.
- 9.4. The Complaints Officer shall also be responsible for overseeing and administering the recruitment of Persons with Disabilities.
- 9.5. The Complaints Officer shall ensure that all Employees are aware of this Policy and know their duties and rights in relation to this Policy.
- 9.6. CRED shall also ensure that the employees and applicants will be protected from coercion, intimidation, interference, discrimination or retaliation for filing a complaint or assisting in an investigation under the applicable laws.

*Any questions relating to this policy can also be filed with the Complaints Officer by emailing at [complaintsofficer@cred.club](mailto:complaintsofficer@cred.club) or by submitting a written complaint in person. This policy can be accessed at [CRED's Website](#).*