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1. Introduction

Sonata Software Limited (“SSL/Company/We”) recognizes and acknowledges the significance of workforce diversity in bringing together individuals with difference in thoughts, capabilities, and skills for business outcomes. SSL is committed to maintain a positive and productive work environment in which everyone is treated with respect and dignity. The Equal Opportunity, Diversity & Inclusion Policy (“Policy”) sets out our approach to ensure equal opportunity, diversity, and inclusion during the course of employment as well as recruitment at all levels.

This Policy also embodies the provisions under “The Rights of Persons with Disabilities Act, 2016” and “The Transgender Persons (Protection of Rights) Act, 2019”

2. Policy Objectives

The objectives of the Policy are as follows:

- Promote equitable and unbiased practices across the organization.
- Ensure that SSL’s employees or potential employees do not suffer any discrimination in the workplace.
- Create a work environment where all decisions are free of discrimination and everyone has access to equal opportunity based on relevant abilities and merit.
- Adherence to applicable law pertaining to equal employment opportunities and fair employment practices.

3. Scope

This Policy applies to SSL and all its subsidiaries, joint ventures, and associate companies. All references to SSL shall be read to include reference to all its subsidiaries, joint ventures, and associate companies. .

We encourage our suppliers and business partners to implement the Policy in their business operations.

4. Diversity Coverage

Diversity reflects a mix of work-force representation on the basis of:

- Gender
- Age
- Differently-abled
- Family Status
- Sexual Orientation
- Marital Status
- Medical Condition
- Pregnancy
- Culture
- Political Affiliation
- Race
- Religion
- Colour
- Nationality
- Or any other status protected by law.

5. Spotting Harassment and Discrimination

Harassment and discrimination exist in different forms. Description of these terms, provided below can be considered as reference to spot such behaviour.

Discrimination is the unfair or biased treatment of any person, whether directly, indirectly, or in any other way, on the basis of their gender, age, race, disability, family status, sexual orientation, marital status, medical condition, pregnancy, culture, political affiliation, race, religion, colour, nationality, or any other perceived differences, as opposed to their individual merits, free from all other factors.

Harassment is defined as conduct that the recipient/individual perceives as unwelcome, unreasonable, uncomfortable, and offensive, that leads to, or likely to lead to, an intimidating, hostile, or humiliating work environment. It could be the result of anyone feeling threatened, insulted, or mistreated due to their gender, age, race, disability, family status, sexual orientation, marital status, medical condition, pregnancy, culture, political affiliation, race, religion, colour, nationality, or any other perceived differences.

Harassment can also be of sexual in nature. This Policy does not cover instances of sexual harassment, which is specifically covered under our policy on 'Sexual Harassment' in SSL's "Policy and Rules on Prevention, Prohibition & Redressal of Sexual Harassment at the Workplace."

6. An Inclusive Culture

The workforce at SSL represents people from diverse backgrounds and culture. Building diversity may not be enough if the employees do not feel included or empowered in the overall work environment.

The process of fostering an inclusive workplace culture and environment involves connecting each person to the organization, valuing their contributions, and successfully utilizing their talents, skills, and viewpoints to advance the goals and missions of the organization.

We value and acknowledge the efforts, initiatives, and perspective of diverse group of people and seek to integrate them into our workplace culture.

7. Approach

We are committed not to discriminate against people on the basis of diversity coverage laid out. We have integrated certain principles and practices and have set up standardized and transparent procedures and processes in our endeavor to create a level playing field and foster equal opportunity among the diverse workforce.

- **Recruitment:** We recognise the value of recruiting employees with diverse backgrounds, knowledge, and experience. Our recruitment processes identify candidates with the most suitable knowledge, qualifications, skills, experience, and personal values. The candidates are assessed on the basis of standard and structured processes such as testing and independent evaluations to promote equitable and unbiased selection and recruitment.
- **Promotion and transfer:** Available opportunities for promotion and internal transfers are shared with all the employees for them to apply for roles and develop their career path. The annual appraisal process provides an opportunity to employees to interact with the managers in a transparent and unbiased manner. We encourage and reward excellence and promotion is granted based on performance.
- **Compensation:** The compensation structure is based on job category and skill category and proficiency, role, internal equity, market parity and affordability. We are committed to fair remuneration, hours of work and social benefits which are based on local laws and regulations as well as prevailing market standards and practices.
- **Learning and Development:** We value our workforce and ensure that we invest in their training & development for employees at all levels, for their upskilling and reskilling to address the skills gap and to enhance their capabilities.

8. Initiatives

To strengthen and promote our commitment towards equality, inclusion and diversity, SSL takes up several initiatives towards an enabling work culture.

- Robust interview process to eliminate biases.
- Focused initiatives to attract and retain talented female professionals through efforts and practices such as flexible working hours, safe travelling, zero tolerance on sexual harassment, and other support to facilitate smooth onboarding / re-absorption of women after career breaks.
- Employee engagement surveys to seek feedback and concerns in relation to diversity and inclusion and incorporate changes based on feedback.
- Training/sensitization on relevant subjects viz. unconscious bias, diversity, and inclusion to create awareness and encourage behaviour that supports a work environment free from discrimination and harassment.
- Easy accessibility and barrier-free environment for people with disabilities, to ensure that such employees have access to basic facilities and amenities at their workplace and suitable infrastructure necessary to discharge their daily duties.
- Appropriate facilities (like inclusive bathrooms), safety and security and amenities are provided to the transgender persons to enable them to effectively discharge their duties. SSL shall evaluate its workplace to assess the requirements and the realignments required to make its offices transgender persons inclusive.

9. Roles and Responsibilities

- **Employees:** All employees are responsible to respect and comply with this policy and applicable laws and regulations.
- **Managers:** All managers have to take reasonable steps to resolve complaints/observations that are brought to their attention and to maintain confidentiality as far as practicable. Managers are also responsible to support this Policy, leading by example, and creating high standards of conduct in the workplace.
- **Human Resource:** Provide counselling and address grievances regarding any form of discrimination with employees at any stage of talent.

10. Failure To Comply

Failure to comply with the provisions of this Policy will be considered a violation of policy and will be subject to disciplinary action depending upon the severity of violation. Before initiating any formal investigation, the individual against whom the complain is filed, would be informed, and asked to stop the objectionable conduct immediately.

11. Violations and Reporting

Any individual with a concern, grievance, or complain of discrimination under this Policy, should report the concerns in accordance with the procedure set out in the Vigil Mechanism Policy. Sonata has set a Global D&I council where one can report in case of any discrimination experienced as specified under the D&I Policy (sonata-d&i-council@sonata-software.com)

If there is a doubt about whether a particular situation tantamount to discrimination or harassment to be disclosed under this Code, the relevant employee is encouraged to consult his/her reporting Managers, or respective locational/functional Human Resources Head, prior to using the Vigil Mechanism Policy.

The Vigil Mechanism Policy lays down the details on:

- Procedure for disclosure about any unethical or improper practices noticed in the organization/ workplace.
- Investigation
- Protection to the person making disclosure.
- Disciplinary or corrective action
- Retention of relevant documents
- Protected disclosure form.

The Policy is available on the Company website and can be accessed on

https://www.sonata-software.com/sites/default/files/financial-reports/2019-09/Sonata_Vigil_Mechanism.pdf.

No retaliatory action will be taken against any individual for raising concerns as regards this, Policy.

12. Policy Review

This Policy will be reviewed and updated annually.

13. Feedback

Your comments are important to us, and we welcome your feedback on our Policy. Please contact us at sonata-d&i-council@sonata-software.com.

14. References

SSL embodies some of the above principles by incorporating them in related policies and processes across all its business operations. The relevant policies can be accessed at www.sonata-software.com., and Sonata One.

- **Vigil Mechanism Policy**
(https://www.sonata-software.com/sites/default/files/financial-reports/2019-09/Sonata_Vigil_Mechanism.pdf)
- **Third Party Code of Conduct & Business Ethics**
(<https://www.sonata-software.com/sites/default/files/financial-reports/2019-09/Sonata-Third-Party-Code-of-Conduct-and-Business-Ethics-2016.pdf>)
- **Code of Conduct for Directors and Senior Management Employees**
(<https://www.sonata-software.com/sites/default/files/financial-reports/2019-09/Code-of-Conduct-for-Directors-and-Senior-Management-Employee.pdf>)
- **Policy and Rules on Prevention, Prohibition & Redressal of Sexual Harassment at the Workplace**
(https://www.sonata-software.com/sites/default/files/financial-reports/2022-01/posh-policy_0.pdf)
- **Human Rights Policy**
- **Code of Business Conduct and Ethics**

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