



Diversity, Equity & Inclusion at Workplace Policy

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Newgen Software Technologies Ltd.

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1. Preface:

The policy on Diversity, Equity and Inclusion must be read in conjunction with Newgen's Code of Ethics & Business Conduct, crafted to ensure the provision of non-discriminatory equal opportunities to all prospects and employees from diverse backgrounds.

Being a knowledge-based organization, Newgen recognizes the benefits of diversity and inclusion to foster innovation, creativity, and critical thinking. We believe in promoting diversity & inclusion as a culture which allows all employees to bring their authentic selves to work and contribute wholly with their skills, experience, and perspective for creating unmatched value for all stakeholders.

The primary objective of this policy is to promote equitable and unbiased practices across the organization. We aim to eliminate unlawful or unethical discrimination and treat everyone with respect and dignity. Through this approach, we strive towards fostering healthy relationships amongst everyone regardless of their background or identity, or diverse abilities, thereby making Newgen a physically and psychologically safe workplace.

At Newgen Software Technologies Ltd, we are committed to creating a diverse and inclusive workplace where all employees are treated with respect and dignity. We believe that diversity is a strength and that it is essential to our success as a company. Our policy on disabilities and diversity and inclusion reflects this commitment.

Newgen is also committed to complying with the Universal Declaration of Human Rights, ensuring that:

- All employees are entitled to equal rights and opportunities without discrimination based on race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or another status.
- Employees have the right to work in a safe and healthy environment that is free from harassment, exploitation, and any form of discrimination or abuse.
- The company should ensure that employees have access to fair compensation, benefits, and

opportunities for career development, regardless of their gender, race, or any other personal characteristic.

- Employees should have the freedom of association and the right to join or form trade unions to protect their interests and rights.
- The company should respect the right to privacy of employees and ensure that personal data is collected, processed, and used transparently and lawfully.
- Employees have the right to receive equal treatment and protection under the law, including access to justice and fair trial.
- The company should promote diversity and inclusion in its workplace by providing equal opportunities to all employees and creating an inclusive work culture that values differences and fosters collaboration and innovation.
- The company should conduct its operations in a manner that respects human rights and avoids complicity in any form of human rights abuse or exploitation.

We are dedicated to providing equal opportunities to all employees regardless of their disabilities, race, gender, age, religion, sexual orientation, or any other characteristic protected by law. We believe that a diverse workforce brings unique perspectives and experiences that can lead to more innovative and creative solutions.

The Company has articulated its employee promise or Cornerstones as Fairness & Transparency, Commitment to Meritocracy, Learning & Growth and providing a Safe and Supportive work environment. The essence of these cornerstones is about providing a broad policy framework that is non-discriminatory and provides equitable opportunity for all individuals irrespective of their gender, religion, caste, race, age, community, physical ability, or gender orientation by challenging opinions and conscious or unconscious biases.

Newgen endeavours to ensure a safe, secure, and congenial work environment so that employees can deliver their best without inhibition. We wish to create an inclusive work environment where we look for

cultural ‘add’ instead of cultural fitment and where differences are celebrated instead of reprimanded.

Our commitment to diversity, equity and inclusion aligns with our values and is reflected in our Code of Ethics and Business Conduct. The Company has put in place a robust Grievance Redressal process for investigation of employee concerns and has instituted a Code of Ethics and Business Conduct that delineates employee responsibilities and acceptable employee conduct. Together, these constitute the foundation for promoting a diverse and inclusive culture in the workplace. The policy is designed to ensure adherence to the laws of the land and supports governance models such as ESG etc, while also ensuring basic human rights of non-discrimination, equal opportunities, and equitable privileges.

The company recognizes the valuable contributions that PwDs, LGBTQ+ and other employees from diverse backgrounds can make to its business and is committed to ensuring that they have an equal opportunity to participate in all aspects of employment. The company shall make every effort to create a workplace that is supportive and inclusive, and where all employees are treated with respect and dignity.

The company, as deemed fit, shall provide the necessary facilities and amenities to enable PwDs, LGBTQ+ and other employees from diverse backgrounds to effectively discharge their duties in the establishment and shall make provisions for assistive devices, barrier-free accessibility, and other facilities to enable them to perform their job duties effectively. PwDs, LGBTQ+ and other employees from diverse backgrounds shall be given preference in transfer and posting, special causal leave, and allotment of residential accommodation, subject to availability. The company shall regularly review and update its policies and procedures to ensure compliance with the Rights of Persons with Disabilities Act, 2016, and Transgender Persons (Protection of Rights) Bill, 2019 amongst other laws of the land protecting the rights of people from diverse backgrounds.

The company believes that senior leaders need to champion a gender-neutral, equal-opportunity workplace and holds them accountable for promoting a safe and inclusive work environment that adheres to the following norms as below:

- i. A workplace which is free from discrimination, harassment, bullying, and victimization;
- ii. Equal employment opportunities and career progression based on principles of fairness and

meritocracy.

- iii. Respectful communication between all employees regardless of title or level.
- iv. Supportive and flexible policies and employment contracts that accommodate the life stage needs of individuals.
- v. An environment where employees feel that their background and lifestyle do not affect perceptions of them as a professional or affect their development opportunities. We encourage our employees to work together and professionally conduct themselves.
- vi. Treating employees fairly and respecting their dignity, privacy, and personal rights.
- vii. Sensitize employees to be aware of their own biases and help them manage the same.
- viii. People with disabilities have equal access to opportunities. The Company values their contribution and to ensure they are not discriminated the Company will take forward reasonable accommodation to ensure a disability-friendly accessible workplace.
- ix. Sensitize managers, team members and relevant personnel on acceptable communication and engagement norms.
- x. Understand the role of intersectionality within diversity and provide relevant support and empowerment to various diversity groups for success.
- xi. The policy applies to all aspects of employment, including recruitment, selection, training, promotion, transfer, and other employment-related decisions and actions. The policy provides guidelines for selecting suitable positions for employees with disabilities or who belong to the LGBTQ+ community and outlines the process for recruiting and training these individuals.
- xii. The policy shows the commitment of the company to make its facilities and amenities more conducive and accessible for employees with disabilities or belonging to the LGBTQ+ community over time.

2. Objective:

At Newgen, we seek to create an inclusive, equitable, culturally competent, supportive, and safe environment where our employees model behaviour that enriches our workplace. To further an inclusive culture and to foster DEIB principles, we recognise many elements of an individual's identity overlap. For instance, a female colleague may also identify as LGBT+, be from a minority ethnic group and/or have a disability, mental health, or neurodiverse condition. The associated experiences that go with these intersecting identities are called intersectionality and can, for some people, mean the disadvantages they face in society are compounded. We consider the impact of intersectionality across all our diversity and inclusion pillars.

Newgen Software Technologies Ltd is committed to complying with the Rights of Persons with Disabilities Act, 2016 and the Transgender Persons (Protection of Rights) Bill, 2019 and any other applicable laws and regulations related to the employment of persons with disabilities or who belong to the LGBTQ+ community and protecting the rights of people from diverse backgrounds.

Therefore, Newgen is committed to:

- i. Improve Diversity across various business lines by focusing on building a talent pipeline focusing on three key pillars:
 - a. Gender Diversity, including women from diverse backgrounds and transgender persons.
 - b. Persons with Disabilities, whether visible or invisible.
- ii. Provide an inclusive working environment free of discrimination at all stages of the employee life cycle.
- iii. Develop platforms to promote DEIB principles and cultural competencies among employees across Newgen and its subsidiaries.
- iv. Strive to build a community where people feel valued and appreciated for their differences irrespective of their diverse cultures, backgrounds, and life experiences.

- v. Ensure our leaders build a culture that is rich in diversity, fosters equity and embodies inclusivity.
- vi. Review measurable objectives, and monitor progress on an annual basis, to ensure equity within policies and practices across the organization.

3. Scope:

- i. The scope of this organization, including its subsidiaries and covers all its employees.
- ii. "Employees" for the sake of this policy includes Newgen associates on the payroll of the company, Management Trainees, and Management Associates, business partners, Project/Summer Trainees, Casual/Temporary employees, employees of contractors/ vendors/partners and such other classes of persons who work on a job or work contract and who are not on direct employment with the Company.
- iii. The policy applies to all aspects of employment, including recruitment, selection, training, promotion, transfer, and other employment-related decisions and actions.

4. Definitions:

- i. **Persons with Disabilities:** As per the Rights of Persons with Disabilities Act, 2016 in India, "person with disabilities " (PwD) means a person with a long-term physical, mental, intellectual, or sensory impairment which, in interaction with barriers, hinders his full and effective participation in society equally with others. The Act recognizes seven categories of disabilities, including blindness, low vision, leprosy-cured, hearing impairment, locomotor disability, mental illness, and intellectual disability.
- ii. **Transgender Persons:** The Transgender Persons (Protection of Rights) Act, 2019 defines a transgender person as someone whose gender does not match the gender assigned at birth and includes transmen and transwomen, persons with intersex variations, gender-queers, and persons with socio-cultural identities such as kinnar and hijra. The Act recognizes the right of transgender persons to self-perceived gender identity and provides for the issuance of a certificate of identity as

proof of recognition of their gender identity. It also prohibits discrimination against transgender persons in employment, education, healthcare, and other areas, and provides for welfare measures to support their full and equal participation in society.

- iii. **Diversity:** Diversity encompasses the differences and the uniqueness of identities, thoughts, and actions among us based on what we experience in access to opportunities and resources. Diversity for Newgen refers to a commitment to recognizing and appreciating the variety of characteristics that make individuals unique in an atmosphere that embraces and celebrates individual and collective achievement. Identity is dependent on much more than one dimension of a person's background. In recognizing and appreciating the many characteristics that make individuals unique, diversity provides solutions to eliminate discrimination in the workplace.
- iv. **Equity:** Equity ensures everyone has access to the same opportunities and right resources so that there is an equal opportunity to thrive, regardless of where we started.
- v. **Inclusion:** Inclusion means fostering respect and a team spirit in the workplace and embracing and amplifying the multiple perspectives, voices, and essence of Newgen. The act of including a strategy to leverage diversity. Diversity always exists in social systems. Inclusion, on the other hand, must be created. To leverage diversity, an environment must be created where people feel supported, listened to and able to do their personal best.
- vi. **Belonging:** Belonging is a sense of connectedness and acceptance that individuals feel within a group or community. In the context of diversity, equity, and inclusion (DEI), belonging refers to creating a workplace culture where all employees feel valued, respected, and included, regardless of their background, identity, or experiences.
- vii. **Harassment:** Harassment is unwelcomed and uninvited conduct which offends, humiliates, or intimidates another person. Conduct does not have to be intentionally designed to harass a person for it to be considered harassment. Conduct may also amount to harassment even if it was not specifically directed at a particular person. Harassment can be verbal, physical, or visual and can be based on a range of grounds such as a person's gender, sexual orientation, family status, race or national origin, nationality, disability, or any other personal characteristic.

- viii. **Bullying:** Bullying is intimidation on a regular and persistent basis or conduct which undermines the competence, effectiveness, confidence, or integrity of a person. Examples of bullying include shouting and swearing at other employees either in public another employee e, abusive language, public humiliation, personal insults or deliberately setting unrealistic targets.
- ix. **Victimization:** Victimization may occur when a manager or colleague treats a person less favourably than he/she would treat another person because he/she has complained of harassment or discrimination.
- x. **Microaggression:** A subtle or indirect form of discrimination or bias that is often unintentional but still hurts the targeted person or group. Examples of microaggressions can include comments, behaviours, or actions that are based on stereotypes or assumptions about a person's identity.
- xi. **Cultural competency:** The ability to understand, appreciate, and effectively interact with individuals from diverse backgrounds, cultures, and identities. Cultural competency involves awareness of one's own cultural biases and assumptions and a willingness to learn and adapt to different cultural norms and values.
- xii. **Allyship:** The practice of actively working to support and advocate for individuals and groups who may face marginalization or discrimination based on their identity. Allyship involves listening, learning, and taking action to support and amplify marginalized voices.
- xiii. **ERGs:** Employee Resource Groups are voluntary groups of employees who share a common identity or experience, such as women, LGBTQ+ individuals, or people with disabilities. ERGs provide a space for employees to connect, network, and support each other, and can also serve as a resource for the organization to better understand and address the needs and concerns of diverse employee populations.
- xiv. **Liaison Officer:** A liaison officer is an individual who acts as a communication link or intermediary between two or more groups, organizations, or individuals. In the context of DEI, a liaison officer may serve as a point of contact between a company and external organizations or communities, such as minority or marginalized groups, to help foster better relationships and understanding. The

liaison officer may work to facilitate communication, build partnerships, and promote collaboration between the company and external stakeholders, to advance DEI initiatives and improve outcomes for all involved parties. Within a company, a liaison officer may also serve as a point of contact for employees who have concerns or questions related to DEI issues, and work with management to address these concerns and promote a more inclusive workplace culture.

- xv. **Reasonable Accommodation:** The Rights of Persons with Disabilities Act, 2016 is the law that governs the rights of persons with disabilities (PwD) in India. The Transgender Persons (Protection of Rights) Bill, 2019 is a separate law that aims to protect the rights of transgender persons in India. Both these laws recognize the concept of reasonable accommodation for PwD and transgender persons, respectively. From the perspective of PwD under the Indian Act of 2016, reasonable accommodation refers to any necessary and appropriate modification or adjustment to a job or workplace that enables a qualified PwD to perform the essential functions of the job and enjoy equal opportunities and benefits in employment. This can include modifications to the physical environment, providing assistive devices or technologies, modifying work schedules or job duties, and providing support services such as sign language interpretation. From the perspective of transgender persons under the Transgender Persons Bill, 2019, reasonable accommodation refers to measures that can be taken to provide equal opportunities and benefits to transgender persons in education, employment, healthcare, and other areas. This can include modifying forms and documents to allow for self-identification, providing gender-neutral facilities, and ensuring that medical professionals are trained to provide appropriate care to transgender individuals.

5. Abbreviations:

Sr. No	Abbreviation	Description
1.	DEIB	Diversity, Equity, Inclusion and Belonging
2.	D&I	Diversity & Inclusion

3.	EVP	Employee Value Proposition
4.	HR	Human Resource
5.	NEWS	Newgen Employee Welfare Society
6.	CEO	Chief Executive Officer
7.	WoW	Women of Wonder
8.	ESG	Employee Resource Group
9.	DAP	Disciplinary Action Protocol
10.	PwD	Persons with Disabilities
11.	LGBTQ+	Gay, Lesbian, Bisexual, Transgender, Queer, Intersex, and Asexual
12.	GH	Group Head

6. Policy Description/Guidelines:

a. Statement of Intent/DEI Charter:

Newgen has defined its charter on DEIB as *“To build and leverage a diverse and inclusive workforce that fosters a sense of belonging and pride amongst each Newgenite while building leadership capability and organizational capacity.”*

Explanation: This requires all employees and others associated with Newgen to do their part. Leaders must possess diversity and inclusion competencies to lead and manage an engaged workforce. Others must treat their colleagues with respect by listening to different viewpoints, avoiding conscious and unconscious biases, opinions, thoughts, and ideas and thus, embracing a culture of inclusion. By integrating DEIB with Newgen’s Employee Value Proposition (EVP), we shall gain a competitive advantage by attracting a better and more diverse pool of candidates, while

retaining key talent.

Our human capital is the most asset that helps us to differentiate ourselves in an increasingly complex and highly competitive world. We believe that the collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities, and talent that our employees invest in their work represents a significant part of not only our culture but our values too.

We celebrate our employees' differences across multiple identity groups both visible and invisible that make our employees unique. We strive to create a culture that allows each of their uniqueness to access opportunities in realizing their potential.

At Newgen, we meaningfully embrace and encourage different perspectives and believe we are made stronger by our unique intersectional combination of, gender, sexual orientation, gender identity or expression, varied backgrounds, cognitive skill, culture, age, race, generations, and ethnicity. Our culture of inclusion and focus on health and well-being helps ensure that everyone – regardless of background – feels included and can run at their best. When we collaborate with others who have different points of view, it creates a greater mix of ideas and spurs innovation -- this is the crux of our reputation and Newgen's success as well.

We are committed to creating workplaces that are safe and inclusive where employees feel empowered to contribute, speak up and bring their best to the work every day. Our leaders embrace this culture by fostering an environment where multiple voices are listened to and where our decisions reflect the collective talents of our people.

Our mission is to not just provide equal opportunities to all but also to create equitable processes and an environment at Newgen that enables a culture of inclusion.

b. Newgen's DEI Framework:**i. Framework (LEAD):**

- **Lead Inclusivity:** Leading inclusivity means taking an active role in creating a workplace culture where everyone feels valued, respected, and included. This involves recognizing and appreciating the unique perspectives and contributions of all individuals, regardless of their background or identity, and actively working to create an environment where everyone feels welcome and supported.
- **Elevate Equitably:** Elevating equitably means recognizing and addressing the systemic barriers and inequalities that exist within the workplace. This includes ensuring that all individuals have equal opportunities for advancement and success, regardless of their race, gender, sexual orientation, or other characteristics. This involves actively working to create a level playing field, and taking steps to address any biases or discriminatory practices that may be preventing certain groups from achieving their full potential.
- **Activate Diversity:** Activating diversity means actively seeking out and embracing differences, and recognizing the value that diversity brings to the workplace. This involves creating an environment where individuals from diverse backgrounds are welcomed and celebrated, and their unique perspectives and experiences are recognized and appreciated.
- **Democratic to Inclusion and Allyship:** Being democratic to inclusion means that decisions and policies related to DEI are made in a democratic and participatory manner, with input from all stakeholders. This involves actively seeking out feedback from employees at all levels and involving them in the decision-making process related to DEI issues.

ii. Strategic Objectives:

- **Diversity** - Improve the representation of women and minorities at all levels of the organization and integrate people from diverse backgrounds, gender preferences, religions, cultures, and nationalities by driving focused talent acquisition and management practices to achieve results.
- **Inclusion** - Create an inclusive work environment that fosters creativity and innovation and promotes engagement across levels through awareness and inclusive leadership skills training, promoting work-life flexibility, and supporting employees' personal needs and uniqueness while providing a safe environment for all to voice out their opinions and views on things that matter to the organization and its individuals.
- **Engagement and Communication** - Ensure that Diversity & Inclusion initiatives, actions, and results are transparent to all key stakeholders.
- **Relationships** - Engage various internal and external stakeholder groups that support the values and interests of the business and its people, including diversity amongst customers, regions, verticals, domains, geographics and demographics of people delivering business.
- **Accountability** - Hold leaders and managers accountable for Diversity, Equity & Inclusion goals, and objectives.

c. The DEIB Governance Structure:

Our Diversity & Inclusion Council (The Council) is responsible for driving and promoting the DEIB plan and initiatives, thus creating an ecosystem where everyone can stand up for who they are, employ their strength to rise high and contribute to the success of their teams by bringing their unique skill and perspective to the fore.

The Council will be responsible for an annual review and revision - not only of progress

but also of initiatives and corresponding ambitions. Towards that, the Council will track a series of metrics both quantitative and qualitative to measure progress.

The Council will have a Council Chair (HR Head), a Lead (NEWS Head) and a Liaison Officer or D&I Secretary (Corp HR) who will work closely with the ESG Steering Committee. The ESG Steering Committee will guide the Council for ESG-related governance. The Council will work independently on other D&I plans under the guidance of the CEO.

The Council will appoint a DEIB team to institute accountability for the programs, initiatives and metrics and drive the agenda for the Newgen. This team will have members representing all locations and genders.

d. **Governance Mechanism:**

Establishing a detailed governance mechanism is critical to fostering and sustaining a culture of diversity, equity, and inclusion (DEI) within an organization like Newgen Software Technologies Ltd. Here is a possible framework for a governance mechanism to support the DEI agenda:

- i. **Establish a DEI committee:** Form a cross-functional committee with representatives from various levels and departments of the company, including HR, leadership, and employees from diverse backgrounds. This committee can serve as a central hub for DEI initiatives and will be responsible for designing, implementing, and monitoring DEI policies and programs.
- ii. **Set clear goals and objectives:** Define specific goals and objectives for the DEI agenda and establish metrics to track progress towards those goals. These goals may include increasing the representation of underrepresented groups at all levels of the company, reducing turnover rates among employees from marginalized communities, or improving employee satisfaction and engagement related to DEI issues.

- iii. **Conduct a DEI audit:** Conduct a comprehensive review of the company's current policies, practices, and culture to identify any areas of weakness or opportunity for improvement. This audit should include input from employees at all levels and be conducted with external DEI experts' guidance. This may be achieved through surveys conducted every three years or as deemed fit by the Management.
 - iv. **Develop and implement DEI policies:** Based on the findings of the audit, design and implement policies and programs to promote DEI within the company. These may include training programs for employees and managers, inclusive hiring practices, or employee resource groups.
 - v. **Appoint a DEI liaison officer:** Appoint a dedicated DEI liaison officer who will serve as the point of contact for DEI-related issues and concerns. This officer should monitor progress towards DEI goals, manage complaints, and work with the DEI committee to implement policies and programs.
 - vi. **Regularly review and revise DEI policies:** Regularly review and revise DEI policies and programs to ensure they remain effective and relevant. Solicit feedback from employees at all levels and conduct periodic audits to track progress towards DEI goals.
 - vii. **Sensitization and training:** Conduct regular training and sensitization programs for employees at all levels to increase awareness and understanding of DEI issues. This may include workshops, seminars, and other forms of training to promote cultural competency, allyship, and other DEI-related skills.
 - viii. **Establish DEI governance model:** Establish a DEI governance model that includes leadership, employee representation, metrics, and benchmarks for the company to follow, review and course-correct if needed.
- e. **Focus Areas under DEIB Council:**
- i. **Policies & Procedures** – Our key people policies and processes are inclusive in

nature, underscoring fairness and equity and creating a balanced approach across a diverse spectrum of employees. Some of our policies offer certain benefits and explicitly call for a support system for those from historically underrepresented backgrounds to consciously ensure non-discrimination. In addition, the policies are devised in line with statutory requirements wherever necessary.

- ii. **Communication & Awareness** – We focus on ensuring sustained communication about DEIB to all employees. Regular leadership communication through town halls, open houses, awareness mailers and blogs reinforce our inclusion philosophy. We ensure that our communication is inclusive and accessible to all. All internal and external communication is to be reviewed for gender neutrality and other aspects of inclusion such as fairness and equity.
- iii. **Equal Employment Opportunity** – Newgen is an equal opportunity employer. We focus on meritocracy and do not engage in or support discrimination in hiring, compensation, access to training, promotion, or retirement based on ethnic and national origin, race, caste, religion, disability, age, gender, creed, marital status, gender identity, gender expression, sexual orientation, political orientation, protected veteran status, or any other characteristic protected by law. We hire and promote based on qualifications, performance, and abilities. All internal and external employment and career advancement opportunities are to be reviewed for gender neutrality and other aspects of inclusion such as fairness and equity. Refer to the Equal Employment Opportunities Policy for more details.
- iv. **Building and fostering allyship for Women of Wonder (WoW)**- Allyship means being consciously inclusive. It helps colleagues to feel respected, involved and connected every day. It means: Embracing difference by seeking the views of people with different perspectives and experiences; Empowering others to succeed and ensuring everyone's voice is heard and their contributions equally valued; Standing up and speaking out for what is right and holding others to account for their behaviours and opening up opportunities for progression and levelling the

opportunities for under-represented groups and more. Newgen actively seeks allyship on gender-related matters that helps foster improved diversity at mid to senior levels. Increasing gender diversity is integral to our long-term goal for Newgen. We recognize that being able to attract, develop and retain top female talent is crucial and that companies with gender-diverse senior management teams perform better.

- v. **Building Cultural Competence** across all levels- Cultural competence is the ability to participate ethically and effectively in personal and professional intercultural settings. It requires knowing and reflecting on one's own cultural values and worldview and their implications for making respectful, reflective and reasoned choices, including the capacity to imagine and collaborate in cross-cultural contexts. Cultural competence is about valuing diversity for the richness and creativity it brings to society. Workshops and training sessions shall be conducted throughout the year to challenge our own understanding and learning about communities different to ours enhanced our culture of inclusion and encouraged colleagues to become allies in the workplace through focused sensitization and training sessions for leaders, managers as well as employees by focusing on all four elements of Culture Competence ie. Awareness, Attitude, Skills, and Knowledge.

vi. **Recruitment, Internal Transfers, and Promotions:**

Newgen Software Technologies Ltd shall make all efforts to ensure that the recruitment, internal transfers, and promotion processes are based on merit and give equal opportunity to people from diverse backgrounds, including PwDs, LGBTQ+ and other employees from diverse backgrounds. The company should provide reasonable accommodation during recruitment to ensure that PwDs, LGBTQ+ and other employees from diverse backgrounds have an equal opportunity to compete for job vacancies.

vii. **Selection of Persons with disabilities or belonging to the LGBTQ+ community for Various Posts:**

All vacancy advertisements should include an appropriate short statement on equal opportunities for people with disabilities or belonging to the LGBTQ+ community. PwDs, LGBTQ+ and other employees from diverse backgrounds who meet the job requirements shall be given equal opportunity in the selection process. The company should provide reasonable accommodation during recruitment to ensure that PwDs, LGBTQ+ and other employees from diverse backgrounds have an equal opportunity to compete for job vacancies.

vii. Post-Recruitment and Pre-Promotion Induction Training:

Newgen Software Technologies Ltd shall provide post-recruitment and pre-promotion induction training to its employees, including PwDs, LGBTQ+ and other employees from diverse backgrounds, to enhance their skills and promote career growth. The company shall make sure that the training programs are accessible to all employees, including those with disabilities or who belong to the LGBTQ+ community, by providing reasonable accommodations.

viii. Preference in Transfer and Posting:

Newgen Software Technologies Ltd shall give equal opportunity to PwDs, LGBTQ+ and other employees from diverse backgrounds in transfer and posting to the extent feasible, subject to business requirements. The company should provide reasonable accommodation to ensure that PwDs, LGBTQ+ and other employees from diverse backgrounds can perform their job duties effectively at their new location.

ix. Special Casual Leave and Other Facilities:

As per the Act, PwDs shall be entitled to special casual leave of four days in a calendar year to address their disability-related needs. The company shall also make provisions for assistive devices, barrier-free accessibility, and other facilities to enable PwDs to perform their job duties effectively.

x. Training and Development:

Newgen Software Technologies Ltd shall provide training and development opportunities to its employees, including PwDs, LGBTQ+ and other employees from diverse backgrounds, to enhance their skills and promote career growth. The company shall make sure that the training and development programs are accessible to all employees, including those with disabilities or who belong to the LGBTQ+ community, by providing reasonable accommodations.

xi. Accessible Workplace:

Newgen Software Technologies Ltd is committed to making its offices more conducive and accessible for PwDs, LGBTQ+ and other employees from diverse backgrounds over time. The company shall ensure that all its officers comply with the accessibility standards specified in the Rights of Persons with Disabilities Act, 2016 or the Transgender Persons (Protection of Rights) Bill, 2019. The company should provide reasonable accommodation for its employees with disabilities or who belong to the LGBTQ+ community to ensure that they can perform their job duties effectively.

xii. Reasonable Accommodations:

Reasonable accommodation refers to the modifications or adjustments made by an employer to ensure that employees with disabilities can perform essential job functions or enjoy equal access to workplace opportunities.

Newgen Software Technologies Ltd should provide reasonable accommodation for its employees with disabilities or who belong to the LGBTQ+ community to enable them to perform their job duties effectively. The company shall assess each employee's needs on an individual basis and provide reasonable accommodation, as necessary. The company shall also ensure that its facilities and equipment are accessible to all employees, including PwDs, LGBTQ+ and other employees from diverse backgrounds.

It may also involve providing ergonomic workstations, adjustable desks or chairs, or other physical accommodations to ensure that employees with mobility impairments can work

comfortably and safely.

In addition, Newgen Software Development may need to modify its recruitment processes, training programs, and work policies to ensure that they are accessible to individuals with disabilities. The company may do so over some time. This may include providing alternate formats for training materials or making adjustments to the work schedule to accommodate the needs of employees with disabilities.

Overall, the goal of reasonable accommodation is to ensure that PwDs have equal access to employment opportunities and can fully participate in the workplace without discrimination or barriers. By providing reasonable accommodation, Newgen Software Development can create a more inclusive and diverse workforce that values the skills and abilities of all employees, including those with disabilities.

xiii. Disability Sensitization:

Newgen Software Technologies Ltd shall conduct disability sensitization programs for its employees to increase awareness and promote a better understanding of disabilities. The company shall also provide training to its managers and supervisors on how to manage and support employees with disabilities or who belong to the LGBTQ+ community effectively.

xiv. Appointment of Liaison Officer:

The Company shall appoint a Liaison Officer who must ensure that the establishment provides reasonable accommodation to persons with disabilities, transgender persons, and other employees from diverse backgrounds.

Such a liaison officer may also provide information and support to employees with disabilities, including information on the rights and entitlements of such employees in Newgen. Such an officer must also participate in receiving and addressing complaints of discrimination or harassment against employees with disabilities, transgender persons, or employees from diverse backgrounds.

The liaison officer must also be facilitating the participation of employees with disabilities in training and development programs, ensuring that they have access to equal opportunities for career advancement and undertaking any other duties assigned by the employer or by the government under the Act.

The liaison officer is in a crucial position in ensuring that the rights of persons with disabilities are protected and promoted within the workplace, and in promoting a culture of inclusion and accessibility.

xv. Compliance:

Newgen Software Technologies Ltd shall comply with all applicable laws and regulations related to the employment of PwDs, LGBTQ+ and other employees from diverse backgrounds. The company shall regularly review and update its policies and procedures to ensure compliance with the Rights of Persons with Disabilities Act, 2016 and other laws of the land.

e. Employee Responsibilities and Obligations

- i. Employees at all levels must implement this Policy in their day-to-day work and their dealings with colleagues and customers.
- ii. It is the responsibility of each line manager to address promptly any questions or concerns about diversity or equal treatment and, if necessary, to refer them to the Human Resources Department for additional assistance.
- iii. The Company will regularly monitor all relevant diversity and inclusion metrics to suggest appropriate actions to various departments for implementation.

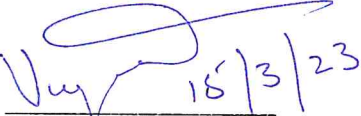
f. Grievance Redressal:

- iv. The policy in Diversity, Equity and Inclusion must be read in conjunction with the Code of Ethics & Business Conduct (policy reference number V3.0, HRD/OD/48/01.08.2010) and Disciplinary Action Protocol (policy reference number V2.0, HRD/OD/ 43 /01.05.2008).
- v. If an employee, manager or leader fails (hereby referred to as a ‘Respondent’) to demonstrate reasonable adherence to this policy, the recipient employee (referred to as a ‘Complainant’) must report an act of workplace harassment, microaggression or any other act they felt excluded or denied an opportunity due to gender preferences or bias may report at ethics@newgensoft.com.
- vi. Investigation and Redressal Mechanism**
- The D&I Council shall appoint an Internal Complaints Committee (ICC) for investigation.
 - Members of the ICC comprise permanent and floating members. The floating members will be considered for investigating the case on a case-to-case basis, having adequate representation from diverse locations/regional offices, gender, and other important parameters to ensure a fair investigation.
 - On receipt of the complaint sent to ethics@newgensoft.com, the Laison Officer must acknowledge the complaint within 24 hours.
 - The Laison Officer must raise an alarm to the D&I Council. The D&I Council shall elect the members of investigating committee.
 - The Complainant shall be informed about the members of the investigating committee and the schedule for investigation by the Laison Officer.
 - The investigating committee must record statements and other evidence. Witnesses and respondents may be called upon for further investigation.
 - The members of the investigating committee must submit their report within 30 days of

the date of complaint. Additional days, if required, depending on the course and nature of the investigation may be approved by the D&I Council.

- A Show Cause Notice must be issued by the D&I Council and a response must be submitted within seven days by the Respondent from the date of issue of the Show Cause Notice, either in person or electronically.
- The D&I Council, along with the GH of the respondent must evaluate the investigation report submitted by the ICC and the response to the Show Cause notice by the Respondent. If the allegation is substantiated based on the evidence on record, then a suitable disciplinary action, as per the policy on Disciplinary Action Protocol, V2.0, HRD/OD/ 43 /01.05.2008 may be executed.
- The HR Rep must update the DAP Tracker on Omnidesk to record the incident.
- The outcome of the investigation must be filed in the personal records of both -- the respondent as well as the complainant.

The Management reserves the right to alter or discontinue the policy without any prior notice.


16/3/23
Virender Jeet
CEO