Turiya Semiconductors Private Limited

Equal Opportunities Policy

Issue Date: Date: 01/ 10/ 2025
Version: 1.0

Policy – Revision History			
SN	**Version No.**	**Effective Date**	**Reviewed & approved by**
1.	1.0	01/ 10/ 2025	Sanchayan Sinha, CEO

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Supersedes: All prior relevant policies

Classification: Turiyam Internal

A. Objective of the Policy:

1. Turiya Semiconductors Private Limited having its registered office at 44, Arjun Marg, DLF-1, Sec-26A, DLF QE, Gurgaon, Haryana, India, 122002 (hereinafter referred to as "Company/ Turiyam") is an equal employment opportunities employer. This Equal Opportunities Policy (hereinafter referred to as "Policy") is drawn up in compliance with anti-discrimination laws and regulations in force in India and forms a part of the code of conduct of the Company.

2. Through this Policy the Company is committed to providing all of its employees with an environment free of discrimination and harassment based upon religion, race, colour, caste, sex, sexual orientation, descent, place of birth, residence, gender identity or expression, pregnancy, age, and disability status, or any other characteristic protected by law (hereinafter referred to as "**Discrimination Characteristics**"). In furtherance of this commitment, Company strives to provide all of its employees with equal opportunity conditions of employment, free from judgement, intimidation or exploitation and to create a work environment where everyone has an opportunity to fully participate in achieving business and is valued for the distinctive skills, experiences and perspectives they bring to the workplace. The Company has a zero tolerance for harassment, intimidation or humiliation of any nature in its workplace and is dedicated to ensuring enactment, observance and adherence of guidelines and best practices that prevent and prosecute acts of discrimination.

3. This Policy is drafted in compliance with anti-discrimination provisions of applicable laws in force in India including, but not restricted to, the provisions of:

    a) The Constitution of India; and
    b) The Protection of Civil Rights Act, 1955; and
    c) The Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, 1989; and
    d) Equal Remuneration Act, 1976; and
    e) Rights of Persons with Disabilities Act, 2016; and
    f) Rights of Persons with Disabilities Rules, 2017.

B. Applicability:

1. The policy is applicable to all employees, staff and consultants (appointed on a regular engagement basis) of the Company in all matters including:

    a) Recruitment; and
    b) Employment and Training; and
    c) Promotion; and
    d) Postings; and
    e) Working conditions; and
    f) Salary administration and contributions to statutory dues; and
    g) Employee benefits and application of Company policies.

2. This Policy shall also apply to the selection and treatment of independent contractors, personnel working on Company premises, who are employed by contractors, if any, and any other persons or firms doing business for or with the Company.
3. This Policy is consistently applied throughout the period of employment of the employee right from the recruitment process till exit from the Company.

C. Exceptions:

There will be no exceptions to this policy.

D. Non-Discrimination Commitment of Turiyam:

1. Turiyam undertakes to provide equal opportunities in its hiring and employment ensuring that applicants are not discriminated against during recruitment and interview processes.

2. Decisions in relation to benefits, leave, transfers, training, layoffs and assistance shall be made without regard to any Discrimination Characteristics. Applicable labour laws shall be enforced throughout the Company without discrimination.

3. Turiyam undertakes to provide anti-discrimination training and sensitation programmes for new joinees as well as refresher training sessions for all employees on an annual basis.

4. This Policy shall be posted on the Company Website and internal portal(s) and shall form a part of the Code of Conduct of the Company.

E. Equal Opportunities for differently abled persons:

1. In compliance with the terms of the Rights of Persons with Disabilities Act, 2016 read with the Rights of Persons with Disabilities Rules, 2017, Turiyam undertakes to provide the following facilities to make the employment experience of different abled employees and staff more comfortable;

    a) Provision of facilities and measures including installation of barrier-free accessibility and assistive devices to ensure accessibility to the Company premises and to help differently abled employees undertake their employment duties without any hinderance; and

    b) During employment drives, posting job vacancies with confirmation of posts that are suitable to differently abled applicants; and

    c) Making special accommodations and taking into account the abilities and feedback of differently abled employees prior to taking decisions in regard to their posting, training, transfers, special leave, responsibilities etc.; and

2. The Company shall appoint a Chief Accessibility Officer who shall be the CEO of the Company to look after the recruitment of persons with disabilities and ensure the provision of facilities and amenities for such differently abled employees. The Chief Accessibility Officer will also be a part of the Anti-Discrimination Committee (defined hereinbelow) to look into matters of discrimination faced by employees.

3. Individuals with disabilities who apply for jobs or employees who believe themselves to be covered by the Rights of Persons with Disabilities Act, 2016, should contact the Chief Accessibility Officer of the Company. Any information shared by differently abled employees shall be voluntary, will be kept confidential, and will be used in accordance with applicable laws. Refusal to provide information will not subject a differently abled employee or applicant to any adverse treatment.

F. Diversity Committee:

1. The officers of Turiyam will be responsible for the dissemination of this Policy. The directors, managers and supervisors shall be responsible for ensuring the implementation of equal opportunity practices within each department of the Company. They shall be supported in their duties by the HR team who shall oversee the implementation of this Policy and shall maintain all necessary records and details of employees and staff of the Company to ensure that no discrimination takes place.

2. Apart from the above, the Company has also seen fit to appoint a 2 (Two) member Anti Discrimination Committee to look into matters of discrimination and provide solutions to grievances, if any, raised by employees and staff of the Company. The term of the Committee members shall be 2 years. For the present term, the Diversity Committee shall comprise of the following members;

SL No.	Name	Position in Complaints Committee
1.	Sanchayan Sinha	Chairperson
2.	Praveen Jain	Member

3. The Anti-Discrimination Committee will maintain a register of complaints received in hard copy and soft copy format detailing the following;

a) Date of complaint;
b) Name of Complainant;
c) Details of Anti-Discrimination Committee members looking into the complaint;
d) Place of incident;
e) The name the Defendant(s) against whom the complaint is made;
f) Gist of the complaint;
g) Documentary evidence collected, if any;
h) Date of disposal by the Anti-Discrimination Committee and details of resolution arrived at;
i) Any other information.

G. Filing a Complaint:

1. Turiyam encourages its employees to come forward in case they encounter, face or witness instances of discrimination within the Company and employees are encouraged to bring the matter to the attention of the Anti-Discrimination Committee of Turiyam at the earliest practical opportunity.

2. Employees (hereinafter referred to as "**Complainant**") may lodge complaints with any of the members of the Anti-Discrimination Committee at the earliest point of time and in any case preferably within 10 (Ten) days from the date of occurrence of the alleged incident. If the Complainant feels that they cannot disclose their identity for any particular reason with the Committee members, they can address the complaint to the management.

3. The Anti-Discrimination Committee will look into the matter filed by the Complainant and can in writing call upon the employee(s) so accused of discrimination (hereinafter referred to as "**Defendant**") to submit their response in writing within 10(Ten) days of receipt of the notice from the Anti-Discrimination Committee. Upon receipt of such reply and hearing the facts of the matter and adjudge upon the same, and direct action to be taken, if any, to resolve the matter. The Anti-Discrimination Committee also has the right to recommend termination of an employee against whom such a complaint of discrimination has been proven.

4. If the Defendant is found to have violated the terms of this Policy, the Company shall take such action as may be appropriate for misconduct by the Defendant under the Company policy. Such actions may include any of the following;

a) Written apology;
b) Warning;

c) Reprimand or censure;
d) Withholding of promotion;
e) Withholding of pay rise or increments;
f) Termination of employment;
g) Counselling session; or
h) Carrying out community service.

H. Confidentiality:

To the fullest extent practicable and consistent with the Anti-Discrimination Committee's need to investigate and ensure that corrective action is taken, all complaints of discrimination by employees will be processed with strict confidentiality.

I. Protection against victimization

1. Employees and applicants will be protected from coercion, intimidation, interference, discrimination or retaliation for filing a complaint or assisting in an investigation under the Act.

2. In the event the Defendant is the Complainant's supervisor/superior, the Company shall on advise from the Anti-Discrimination Committee, during the pendency of the Complaint, ensure that the reporting relationship is suspended and that the Complainant is not subject to appraisal by the Defendant.

3. The Company shall strictly prohibit any sort of retaliation against the Complainant or any witnesses. Any act of reprisal, including internal interference, coercion and restraint, by the Defendant, whether directly or indirectly, will result in appropriate action against the Defendant by the Management in consultation with the Anti-Discrimination Committee.

4. Where the Defendant is an outsider, during the pendency of the investigation of the Complaint and even, thereafter, if found guilty, the Defendant shall not be allowed to enter the Company premises except for the purpose of attending the Anti-Discrimination Committee proceedings.

5. In the event of the Defendant and the Complainant both being employees of the Company, and the Defendant is found to be guilty, irrespective of the penalty imposed, the Company shall ensure that the Defendant shall not write the appraisal reports of the Complainant, if he is otherwise so authorized.

6. In the event, the Anti-Discrimination Committee after investigation of a Complaint in accordance with the procedure prescribed herein, concludes that the Complaint was false, frivolous or made with *malafide* intention by the Complainant including due to personal issues with the, Defendant, then the Anti-Discrimination Committee shall make such appropriate recommendations to the Management to take action against the Complainant, as may be necessary.

J. Amendments:

Any amendments to this Policy are required to be approved by the CEO in advance in writing.

CONFIRMED & APPROVED BY:

Signature: 
Name: Sanchayan Sinha
Designation: CEO
Date: 01.10.2025

Please Note: *The Company reserves the right to amend and/ or alter this policy/ guideline anytime at its discretion. This policy is subject to change at the discretion of Turiyam's management. Any updates or modifications to the policy will be communicated to all employees in a timely manner.*