**GRIFFIN CAPITAL SERVICES LLP**

**Registered Office:** 29, Prestige Meridian, 912, 9th Floor, M.G. Road, Bangalore – 560001

# EQUAL OPPORTUNITY POLICY FOR PERSONS WITH DISABILITIES

**Effective Date: 20 December 2023**

## 1. PURPOSE AND POLICY STATEMENT

Griffin Capital Services LLP ("GCSLLP" or the "LLP") is committed to providing equal opportunities, dignity, respect and an inclusive working environment to persons with disabilities.

This Equal Opportunity Policy ("Policy") has been formulated in accordance with the **Rights of Persons with Disabilities Act, 2016** ("RPwD Act"), the **Rights of Persons with Disabilities Rules, 2017** ("RPwD Rules") and other applicable laws, rules and regulations.

GCSLLP shall endeavour to ensure that persons with disabilities are not discriminated against in matters relating to employment and are provided reasonable accommodation and appropriate facilities to enable them to effectively discharge their duties.

## 2. SCOPE AND APPLICABILITY

This Policy applies to GCSLLP and to all stages of employment, including recruitment, selection, appointment, training, performance evaluation, career development, promotion, transfer and continuation of employment, as applicable.

The Policy applies to employees and applicants for employment with disabilities and shall be implemented having regard to the nature of the LLP's operations, the requirements of individual roles and applicable law.

For purposes of this Policy, the terms **"person with disability," "person with benchmark disability," "reasonable accommodation," "discrimination"** and other expressions relating to disability shall have the meanings assigned to them under the RPwD Act and applicable rules.

## 3. EQUAL OPPORTUNITY AND NON-DISCRIMINATION

GCSLLP shall provide equal opportunity to persons with disabilities and shall not discriminate against any person merely on the ground of disability in relation to employment.

Employment-related decisions shall be based on legitimate factors including qualifications, experience, competence, performance, suitability for the relevant role and the inherent requirements of the position.

Where reasonably required, GCSLLP shall consider appropriate modifications or adjustments to enable a person with disability to participate in the recruitment process or effectively perform the duties of a position, subject to applicable law.

No employee shall be subjected to harassment, intimidation or adverse treatment on account of disability or for seeking reasonable accommodation under this Policy.

## 4. RECRUITMENT AND SELECTION

GCSLLP is committed to providing persons with disabilities a fair opportunity to apply for and be considered for positions for which they possess the requisite qualifications, skills and experience.

The LLP shall endeavour to ensure that its recruitment and selection processes do not create unnecessary barriers for persons with disabilities.

Where an applicant with a disability requires reasonable accommodation to participate in a recruitment or selection process, GCSLLP shall consider and, where appropriate, provide suitable accommodation having regard to the nature of the disability, the requirements of the position and applicable law.

Selection shall be based on merit, suitability and the requirements of the relevant position without discrimination on the ground of disability.

## 5. IDENTIFICATION AND SUITABILITY OF POSTS

GCSLLP shall assess positions within the organisation on the basis of their functions, responsibilities, skill requirements and working conditions to determine their suitability for persons with different disabilities.

The LLP shall not exclude a person from consideration for a position merely on account of disability where such person is otherwise capable of performing the essential functions of the position, with reasonable accommodation where required.

The suitability of a particular position may be reviewed from time to time having regard to changes in job requirements, technology, assistive devices and the nature of the LLP's operations.

**6. FACILITIES, AMENITIES AND REASONABLE ACCOMMODATION**

GCSLLP shall endeavour to provide reasonable facilities and amenities required by employees with disabilities to enable them to effectively discharge their duties.

Depending upon the individual requirement and the nature of the disability, such measures may include:

a. reasonable modification of the employee's workstation or seating arrangements;

b. accessible working arrangements and reasonable adjustments to the physical work environment;

c. reasonable flexibility in working arrangements, where appropriate and compatible with the employee's duties;

d. accessible communication formats and assistance with workplace communications, where reasonably required;

e. appropriate assistive devices, software or technology where required for the effective performance of duties;

f. assistance in accessing workplace facilities; and

g. such other reasonable accommodation as may be appropriate having regard to the employee's disability, job responsibilities and applicable law.

Requests for reasonable accommodation shall be considered on a case-by-case basis in consultation with the concerned employee.

**7. ACCESSIBILITY AND ASSISTIVE DEVICES**

GCSLLP shall endeavour to progressively identify and address barriers that may prevent or restrict persons with disabilities from accessing and participating effectively in the workplace.

Where necessary and reasonable, the LLP may provide or facilitate appropriate assistive devices, technological aids, accessible software, communication assistance or other measures required by an employee with disability for the effective performance of his or her duties.

The LLP shall have regard to applicable accessibility standards and requirements prescribed under the RPwD Act and rules made thereunder.

**8. TRAINING, CAREER DEVELOPMENT AND PROMOTION**

Employees with disabilities shall be provided fair and equal access to training, professional development and career advancement opportunities for which they are otherwise eligible.

Disability shall not, by itself, constitute a ground for denying an employee an opportunity for training, performance evaluation, promotion or career development.

Where reasonably necessary, appropriate accommodation may be provided to enable an employee with disability to participate effectively in training or development programmes.

**9. TRANSFER, POSTING, LEAVE AND OTHER FACILITIES**

Where relevant to the operations of GCSLLP, the LLP shall give due consideration to disability-related requirements when considering the transfer, posting or work location of an employee with disability.

Requests for disability-related leave, flexibility or other facilities shall be considered reasonably and in accordance with applicable law and the LLP's employment policies.

Where GCSLLP does not provide residential accommodation to employees generally, provisions relating to preference in allotment of residential accommodation shall not apply.

**10. EMPLOYEE ACQUIRING DISABILITY DURING EMPLOYMENT**

Where an employee acquires a disability during the course of employment, GCSLLP shall consider appropriate reasonable accommodation and measures that may enable the employee to continue to perform his or her existing duties.

Where the employee is unable to perform the essential functions of the existing position even with reasonable accommodation, the LLP shall consider, to the extent required under applicable law, whether the employee can be reasonably accommodated in another suitable role having regard to the employee's qualifications, capabilities and the requirements of the organisation.

Any such matter shall be dealt with sensitively, confidentially and in accordance with applicable law.

**11. LIAISON OFFICER**

GCSLLP shall designate a **Liaison Officer**, where required under applicable law, to oversee matters relating to employment of persons with disabilities and the provision of appropriate facilities and amenities to such employees.

The Liaison Officer shall, inter alia:

a. facilitate implementation of this Policy;

b. assist employees and applicants seeking reasonable accommodation;

c. coordinate the provision of facilities and amenities to employees with disabilities;

d. assist in identifying and addressing workplace accessibility requirements;

e. oversee the maintenance of records required under applicable law; and

f. act as a point of contact for matters relating to implementation of this Policy.

**Liaison Officer:** RAVI NARAYAN
**Designation:** PARTNER
**Contact Details:** 96116 66699

The LLP may change the person designated as Liaison Officer from time to time without requiring amendment of the remainder of this Policy.

**12. CONFIDENTIALITY**

Information relating to an individual's disability, medical condition, request for accommodation or supporting documentation shall be handled sensitively and, to the extent reasonably practicable and required by law, confidentially.

Such information shall be accessed or disclosed only where reasonably necessary for implementing this Policy, providing accommodation, complying with law or for another legitimate employment-related purpose.

**13. RECORDS**

GCSLLP shall maintain such records relating to persons with disabilities, their employment, the nature of work performed and facilities or amenities provided to them as may be required under the RPwD Act, the RPwD Rules and other applicable law.

Such records shall be maintained and produced for inspection by the competent authorities where required under applicable law.

**14. COMPLAINTS AND GRIEVANCES**

Any employee or applicant who believes that he or she has been discriminated against on the ground of disability, has been denied reasonable accommodation, or has otherwise experienced non-compliance with this Policy may raise the matter with the Liaison Officer, a Designated Partner, or such other person as may be authorised by GCSLLP.

All complaints shall be considered promptly, fairly and sensitively. Appropriate corrective action shall be taken where a complaint is found to be substantiated.

No person shall be subjected to retaliation or adverse treatment merely for raising a bona fide concern or requesting reasonable accommodation under this Policy.

Nothing contained in this Policy shall restrict any person's right to approach an authority or seek any remedy available under applicable law.

**15. RESPONSIBILITIES OF EMPLOYEES**

All employees of GCSLLP are expected to:

a. treat persons with disabilities with dignity and respect;

b. maintain an inclusive and professional workplace;

c. refrain from discrimination, harassment, ridicule or inappropriate conduct based on disability;

d. cooperate with reasonable measures implemented by the LLP to facilitate accessibility and inclusion; and

e. promptly report any conduct inconsistent with this Policy.

**16. PUBLICATION AND REGISTRATION OF POLICY**

In accordance with the RPwD Act and RPwD Rules, this Policy shall be displayed on GCSLLP's website, where applicable, or at a conspicuous place at its premises.

A copy of this Policy shall be registered with the **Chief Commissioner for Persons with Disabilities or the State Commissioner for Persons with Disabilities, as applicable**, in accordance with Section 21 of the RPwD Act and applicable rules.

**17. INTERPRETATION AND AMENDMENT**

This Policy shall be interpreted consistently with the RPwD Act, the RPwD Rules and other applicable laws.

If any provision of this Policy is inconsistent with any mandatory provision of applicable law, the applicable statutory provision shall prevail and this Policy shall be construed accordingly.

GCSLLP reserves the right to amend, modify or supplement this Policy from time to time to reflect changes in applicable law, regulatory requirements, organisational requirements or recognised practices relating to persons with disabilities.

**18. EFFECTIVE DATE AND APPROVAL**

This Policy shall come into effect from **20 December 2023** and shall remain in force until amended or replaced by GCSLLP.

The Policy has been adopted and approved by the Partners of Griffin Capital Services LLP.

**For GRIFFIN CAPITAL SERVICES LLP**

| **Partner 1** | **Partner 2** |
|---|---|
| Name: RAVI. NARAYAM. | Name: Shanth Ganapathy |
| Signature: | Signature: |
| Date: 20 December 2023 | Date: 20 December 2023 |

**Place: Bangalore**