

Equal Opportunity in Employment Policy

Version Control

Version	Date	Change Details
1.0	Dec 2019	Policy Introduced
2.0	August 2023	Policy updated as per compliance requirement.
3.0	July 2026	Policy Restructured

Introduction and Objective

Brookfield India Real Estate Trust (hereinafter referred to as “BIRET”¹, “the Company” or “our” or “we” or “us”), is committed to providing equal employment opportunities and fostering an inclusive, respectful, and discrimination-free workplace. The Organization prohibits discrimination, harassment, or unfair treatment based on religion, race, caste, color, sex, gender identity, gender reassignment, sexual orientation, national origin, age, marital status, pregnancy, disability, or any other characteristic protected under applicable law.

In the recent years, the Government of India has enacted an important Act viz. “The Rights of Persons with Disabilities Act, 2016 & Rules thereunder”. The principal objective of the enactment of the said Act is to have inclusive employment opportunities for the disabled persons

This Policy has been formulated in accordance with the provisions of the Rights of Persons with Disabilities Act, 2016, and the rules framed thereunder (collectively referred to as the "Act"). In line with the provisions of the Act, the Organization is committed to promoting equal opportunity, preventing discrimination, and fostering an inclusive workplace for all stakeholders in its employment practices. In the event of any inconsistency between the provisions of this Policy and the Act, the provisions of the Act shall prevail.

Applicability

This Policy applies to all employees of BIRET, irrespective of employment type or location. It also applies to job applicants, interns, trainees, apprentices, temporary employees, contract workers, employees of service providers, consultants (where applicable), and other individuals engaged by the Organization.

Definitions

In this policy, unless the context otherwise requires:

- a) “The Acts”- In this policy any mention of the Act or Acts would have the reference to “The Rights of Persons with Disabilities Act, 2016 & Rules thereunder” or any other legislation as relevant to the subject matter contained in this policy.
- b) “Complainant or Aggrieved Person” Means any person who has raised a grievance as per clause 3(f) of this policy.
- c) “Designated Officers/Liaison Officers” Means the officers who are responsible to receive any grievances under the provisions of this policy.
- d) "Discrimination" means any unfair or less favorable treatment based on religion, race, caste, color, sex, gender identity, gender reassignment, sexual orientation, national origin, age, marital status, pregnancy, disability, or any other characteristic protected under applicable law.
- e) “Employee” means a person employed at a workplace for any work on permanent, temporary, ad hoc or daily basis either directly by the Organization or through a service provider and includes Board members of the Organization, any co-employee, an employee of service provider, probationer, trainee, apprentice, intern or called by any other name under any statutory or internal scheme of the Organization, whether employed on remuneration or on voluntary basis.

¹ BIRET include the following Brookprop Management Services Private Limited, Mountainstar India Office Parks Private Limited, Candor India Office Parks Private Limited, Candor Gurgaon One Realty Projects Private Limited, Candor Kolkata One Hi-tech Structures Private Limited (G2), Candor Kolkata One Hi-tech Structures Private Limited (K1), Shantiniketan Properties Private Limited, Seaview Developers Private Limited, Festus Properties Private Limited, Kairos Properties Private Limited, Rostrum Realty Private Limited, Aspen Buildtech Private Limited, Oak Infrastructure Developers Private Limited, Arnon Builders & Developers Private Limited, Arliga Ecoworld Business Parks Private Limited, collectively and any other new acquisitions/ addition of BIRET in India.

- f) "Grievance" means any complaint or concern pertaining to employment or any other employment related discrimination raised to the designated authorities of the Organization by the Complainant under the terms of this policy.
- g) "Stakeholders" means any person or organization or entity having business relations with the Organization and includes employees and job applicants.
- h) "Person with disability" Due to the exclusive nature of "The Rights of Persons with Disabilities Act, 2016, all the definition of person with disability such as "person with benchmark disability", "person with disability", "person with disability having high support needs" are adopted from the Act for the purpose of this policy.
- i) "Reasonable accommodation" means necessary and appropriate modifications or adjustments, without imposing a disproportionate or undue burden on the Organization, to enable persons with disabilities to participate fully and effectively in employment.
- j) "Support" means an intensive support, physical, psychological, and otherwise, which may be required by a person with disability or certain disease for daily activities, to take independent and informed decision to access facilities and participating in all areas of employment opportunities in the Organization.

Employment Practices/Opportunities

In strict alignment with the provisions and principles contained in the Acts, the Organization is committed to and shall strive to create and enforce equal opportunities in all the following areas that are observed or practiced by the Organization. The list is indicative, and the Organization may contain any other relevant process followed in the Organization or adopted by the Organization in the future. In all the following practices that are provided herewith, the Organization shall always be mindful about ensuring "reasonable accommodation" and "Support" for the person with disability.

- a) Hiring Process- The Organization shall not make any discrimination of any person in the hiring process in order to fill the vacancies that are available with the Organization. The entire hiring process will be based on the qualifications, competence, experience, and merit of the prospective candidate. The Organization shall always endeavor to make reasonable accommodation for the persons with disability in the available opportunities.
- b) Creation of enabling working environment- by providing reasonable accommodation and appropriate support to persons with disabilities.
- c) Equal pay shall be provided based on job responsibilities, qualifications, experience, skills, performance, and applicable compensation practices, without discrimination.
- d) Promotions shall be based solely on merit, performance, qualifications, and business requirements, without discrimination.
- e) Support in acquiring higher skills or education.
- f) Training and development opportunities to enhance career growth.
- g) Appropriate support, including reasonable flexibility for medical treatment or therapy, may be provided where required.

Facilities Provided to Persons with Disabilities

The Organization has provided various enabling facilities to the persons with disabilities. The details of the same are mentioned in Annexure I of the policy.

Designated/Liaison Officers

Organization has nominated few officers of the Organization who will act as the designated/liaison officer and any grievance with respect to the violation of the Acts or this policy can be brought to the knowledge of any of these officers as per the process mentioned in clause 7 of the policy. The details of these officers are attached as Annexure II with this policy.

Grievance Information/Reporting

- a) Through a written complaint addressed to the “Designated Officers” appointed as per clause 6 of the policy, any aggrieved person can bring forward his or her complaint to the notice of the designated officers. The complaint can be shared by a letter or through an email or through any other appropriate channels of communication available in the Organization to any of the designated officers. The contact details and email address of the designated officers are mentioned in Annexure II of the policy.

Wherever the aggrieved person prefers to meet the designated officers in person to share the complaint verbally, the same shall be allowed by the designated officers. However, the designated officer will provide every support to the aggrieved person to make the complaint in writing and obtain his or her signature on the same. Alternatively, complaints of the aggrieved person can be reduced in written form by the designated officer and the complainant is required to sign the same.

- b) The aggrieved person should file his/her grievance immediately or within one month of experiencing, witnessing, or becoming aware of the incident. However, for the reasons to be recorded in writing, the designated officer may allow further extension of one month’s time to file the grievance.
- c) Depending upon the nature of the grievance, the Designated Officer shall forward the same to the “Resolution Committee” constituted as per clause 8 of this policy for its further investigation or enquiry and resolution.
- d) The aggrieved person shall fully participate and support any investigation or inquiry initiated by the Resolution Committee.
- e) The Resolution Committee shall endeavour to resolve the grievance within 30 calendar days from the date of receipt and share its outcome with the aggrieved person. The same can be done by the resolution committee directly or through the designated officers.
- f) It is made clear that the exclusive forum of the designated officer is created to enable the aggrieved person to raise the grievance to the Organization. Any designated officer may also act as the part of the resolution committee.
- g) Wherever the complaint is against the designated officer or any other officer of the resolution committee, that officer shall recuse himself or herself from participating in the investigation/enquiry process.

Duties of the Resolution Committee

Depending upon the circumstances and the gravity of the grievance that is brought to the attention of Resolution Committee, the Resolution Committee may initiate further enquiries or investigations and endeavour to resolve/settle the grievance within a period of 30 days from the date of its receipt.

During the course of the investigation or enquiry, the Resolution Committee may prefer to interact with different persons or inspect any documents to arrive at a conclusion. All the employees and other stakeholders shall support/participate as and when required in any such investigation or enquiry initiated by the Resolution Committee.

Confidentiality

All complaints, investigations, records, and proceedings under this Policy shall be treated as confidential and disclosed only on a need-to-know basis or where required by law.

Appellate Authority

Any person aggrieved by the decision of the Resolution Committee may prefer to appeal to the CEO of the Organization for his/her intervention. The CEO may interact with the resolution committee or complainant or any other person in his/her own discretion or advise any further investigation/enquiry to finally arrive at a conclusion. The decision of the CEO shall be final and binding on all concerned.

Obligations of the Employees and Other Stakeholders

All the persons employed by the Organization or having business relations with the Organization shall

- a) Maintain highest standards of individual conduct that would not make any other person feel discriminated against, uncomfortable and violate employee's right to work with dignity in a working environment based on equality.
- b) Familiarize themselves with the contents of this Policy and honor its principles in spirit and in practice.
- c) Familiarize themselves with the penal consequences of violation of this policy.

Non-Retaliation

The Organization prohibits retaliation against any individual who, in good faith, reports discrimination, raises a grievance, participates in an investigation or enquiry, or provides information in connection with an alleged violation of this Policy. The Organization has zero tolerance for any form of retaliation. Any individual found to have engaged in retaliatory conduct shall be subject to appropriate disciplinary action in accordance with the Organization's policies. Where the outcome of the investigation establishes that a complaint was made maliciously or with the intent to defame or malign any individual or the Organization, appropriate disciplinary action may also be initiated in accordance with the applicable policies of the Organization.

Violation of the Policy

Any violation of this Policy shall be treated seriously by the Organization. Depending on the nature and severity of the violation, appropriate disciplinary action may be taken in accordance with the Organization's disciplinary policies, up to and including termination of employment or cessation of the business relationship, as applicable.

Review of the Policy

The policy shall be reviewed and amended by the Organization as and when required in its discretion or based on any statutory changes applicable to the Organization.

Policy Communication & Awareness

This policy is displayed in corporate office of the Organization. This Policy shall be made available to employees through the HR Intranet and other appropriate communication channels. The Organization will conduct periodic awareness programmes through e-learning modules, classroom sessions, posters, and other suitable communication initiatives.

Annexure I**Refer Clause “5”****(Facilities provided to Persons with Disabilities)**

- a) Safe Working Environment- Walking spaces in the aisles are always maintained free of obstacles. Reasonably comfortable and large working space is provided to every employee so that they can work comfortably. The overall office furniture arrangement is made in a way that no protruding objects are hanged on the walls or obstruct the movements.
- b) Digital Gadgets - Appropriate to the appointment of person with certain disabilities, the Organization shall deploy digital gadgets which can be used by the visually impaired employees.
- c) Accessible entrance- Organization has created special facilities such as ramps, rails and special toilets to suit the special needs of differently abled. The arrangement of wheelchairs is also made to use the ramps safely. Organization will provide the tactile signs at appropriate locations for the use of visually impaired employees.
- d) Amenities- All the amenities such as washrooms, watercoolers, dining areas are organized in a manner that are easily accessible to the employees.
- e) Other Reasonable accommodations- Depending upon the requests of the person with disability, the Organization will accommodate any request to provide additional facilities to them.
- f) Disability Consultant/Counsellor- Organization will utilize the support of appropriate external experts, counsellor to improve the overall facilities that are offered by the Organization to the person with disability including if required special medical care.