

## Equal Opportunity Policy

At Acuiti Labs, we believe in equal opportunity for all our employees, and as an inclusive employer, actively encourage the recruitment, advancement, and retention of people without any form of discrimination in employment opportunities or practices.

Selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question. Personal specifications and job descriptions will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment, promotion or transfer will be assessed objectively against the requirements for the job.

Acuiti Labs will strictly refrain from demonstrating bias or prejudice towards individual differences which will be valued and protected.

Acuiti Labs reserves the right to initiate appropriate disciplinary action (which includes termination of employment) against the concerned individual responsible for violation of this policy. Equally, actual or threatened retaliation against employees who complain about discrimination, cooperate with investigations regarding discrimination complaints, or request for any facility in accordance with this policy is prohibited and unlawful, and Acuiti Labs reserves the right to initiate appropriate disciplinary action (which includes termination of employment) against the concerned individual responsible for such instances.

### **Persons with Disabilities:**

- Disability refers to any condition which has a significant, adverse and long-term effect on a person's ability to carry out normal day-to-day activities. Acuiti Labs endeavours to provide barrier-free accessibility and availability of any assistive devices as may be required by persons with disabilities, and it aims to ensure that its events and meetings are inclusive and conducted at an accessible venue, with a provision of reasonable accommodation for differently abled people, as and when it is required.
- Acuiti Labs ensures that all persons with disabilities are provided with adequate training (post-recruitment and pre-promotion) as well as training materials in accessible formats on request to enable equal opportunity for career progression.
- Acuiti Labs has an accessible and inclusive appraisal process and ensures that all managers are trained in objective appraisal process methodology.

- A Liaison Officer has been appointed who will oversee the compliance and implementation of this policy at Acuiti Labs. Currently, the Liaison Officer is [Insert details] and can be reached at [Insert email address].
- The Liaison Officer shall ensure the following: (a) provision of required infrastructure facilities and amenities for persons with disabilities; (b) hiring process based on fairness, ability and merit; (c) implementation of policies and processes including but not limited to job responsibilities, training, performance review, promotion, transfers, exits; (d) provides redressal mechanism in case of any grievance raised involving unlawful discriminatory conduct; and (e) suggest any changes/recommendations based on industry best practices to ensure that Acuiti Labs remains at the forefront of being an equal opportunity employer.
- Any employee requiring specific accommodation and assistive devices may inform the Liaison Officer in writing or verbally, with assistance of any other employee (as the case may be) and details of such requirements at the time of joining or anytime during their service tenure.
- The declaration of disability will be completely on voluntary grounds and will be kept confidential.
- In addition to the leave entitlements already available to the employees, an employee's request for extra leave, for a reason related to their disability, will be evaluated by the Human Resources Department in consultation with such employee's reporting manager.

### **Transgender Persons:**

- A 'transgender person' refers to a person who identifies themselves with a gender which is not the same as the gender assigned to that person at birth and includes trans-man or trans-woman (whether or not such person has undergone sex reassignment surgery or hormone therapy or laser therapy or such other therapy), person with intersex variations, and genderqueer.
- No individual is denied any opportunity on grounds of their gender identity. Selection of qualified applicants is based on merit, considering the job requirements, individual's suitability, ability, competence, and trainability to execute the role.
- Acuiti Labs follows the principle of equal pay and terms of employment (including benefits, training, promotions, performance reviews, transfers, exits, etc.) without any bias. Acuiti Labs has a transparent and standard rewards framework applicable to all employees which is an objective-driven basis

individuals' roles, qualification, experience, and duties. Any benefits (monetary, developmental or progression) are based on performance and potential as per business needs.

- An employee seeking support in the form of time off for treatment and therapy may contact the [Human Resources Department] in this regard, which will evaluate and arrive at a decision on such request in the manner deemed appropriate and subject to receipt of such information from the employee as it may require.
- The Company has appointed **Niva Reitz, Global HR Director** as the **Complaint Officer** to ensure effective implementation of this policy and to receive any complaint of violation of this policy. The Complaint Officer may be reached at **niva.r@acuitilabs.co.uk**. All employees are also encouraged to report any incidents of violation of this policy or to offer recommendations towards implementation of this policy in writing to the Complaint Officer at the above designated email address.
- The Complaint Officer oversees compliance and ensures the following: (a) provision of required infrastructure facilities and amenities for transgender persons; (b) hiring process based on fairness, ability and merit and will ensure that no opportunity is denied to any person on grounds of gender identity; (c) implementation of policies and processes including but not limited to job responsibilities, training, performance review, promotion, transfers, exits; (d) provision of redressal mechanism in case of any grievance raised involving unlawful discriminatory conduct; and (e) suggestion of any changes / recommendations based on industry best practices to ensure that Acuiti Labs remains at the forefront of being an equal opportunity employer.
- It is to be noted that since the information about a transgender person's sex at birth and/or sexual orientation is sensitive personal information, Acuiti Labs will ensure that such information is kept confidential and not shared with anybody. Any unwarranted/unauthorised disclosure of the same by any employee may lead to violation of a transgender person's privacy and, therefore, Acuiti Labs will take strict disciplinary actions against such disclosures. Any information provided is voluntary, will be kept confidential, and will be used in accordance with applicable laws and policies of Acuiti Labs. Refusal to provide information will not subject an employee or applicant to adverse treatment in any matter pertaining to employment.

### **HIV+ Persons:**

- At Acuiti Labs, we do not discriminate against individuals on the basis of their medical condition, including the existence of Human Immunodeficiency Virus ("HIV") and Acquired Immune Deficiency

Syndrome (“AIDS”) and are committed to providing an inclusive work culture and environment where all individuals associated with the organisation are treated with respect and dignity. Discrimination based on HIV and AIDS status is a threat to a productive workforce.

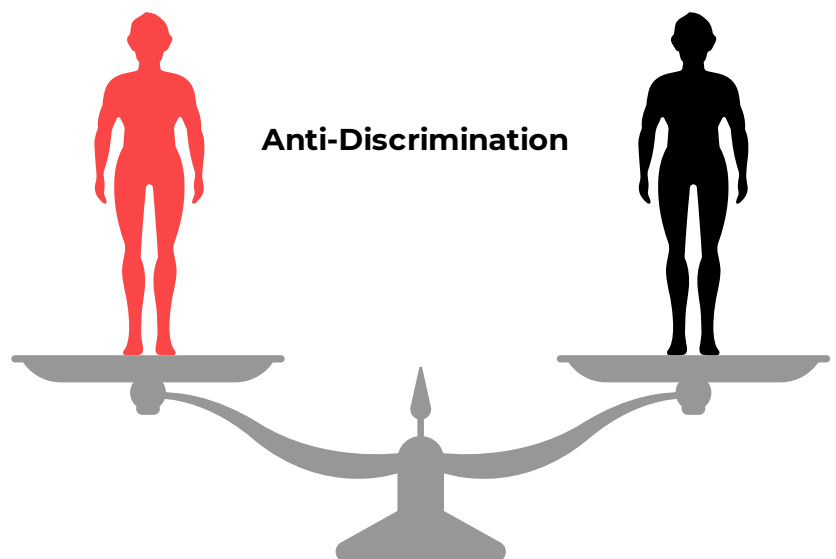
- Acuiti Labs shall ensure that no person is discriminated against based on perceived or real HIV and AIDS status. Such discrimination is prohibited not only against individuals infected with HIV and AIDS but also against individuals affected by HIV and AIDS, wherein the latter case may include individuals living, cohabiting, and residing with an HIV-positive person. It also encompasses other individuals who have lived, resided, or cohabited with an HIV-positive person in the past. As a co-worker, it is the responsibility of every individual to not discriminate against other individuals on the basis of HIV and AIDS status. Any form of discrimination such as avoiding talking to, sharing of meals with or travelling with the individual infected with and / or affected by HIV and AIDS etc., is prohibited.
- Further, no individual is required to undertake HIV and AIDS testing as a pre-requisite for any engagement with the Company or for the continuation of the same.
- Acuiti Labs shall provide reasonable accommodation (i.e., minor adjustments to a job or work) to individuals with HIV/AIDS if required. The concerned individual may accordingly reach out to the Human Resource Department and request for the grant of any such minor adjustments, for the effective discharge of their duties. Acuiti Labs retains the discretion to appoint qualified and competent healthcare providers to assess if the individual poses a significant risk of transmission of HIV to other persons in the establishment or is unfit to perform the duties of the job.
- Acuiti Labs recognises the sensitivity of the issues that surround HIV and AIDS and shall handle the matter in a highly discreet and private manner. Accordingly, no individual shall be forced to disclose their status or any other HIV-related information.
- If an individual infected with / affected by HIV and AIDS has revealed their status to the management, Acuiti Labs will keep the identity of such individual confidential. In case any disclosure has been made by Acuiti Labs or to Acuiti Labs regarding an individual’s HIV status, the same must have been undertaken with informed consent either from the person who is infected with or affected by HIV and AIDS or from their representatives (unless the informed consent is not required under the law).
- It is the responsibility of all individuals to ensure that they are aware of concepts of consent, disclosure and confidentiality relating to HIV and AIDS and that they do not disclose HIV-related information. It is also the moral responsibility of all individuals to not engage in activities which breach confidentiality.

- Grievance redressal mechanism is vital in order to provide a holistic non-discriminatory environment to people infected with and/or affected by HIV and AIDS. The law proposes a robust mechanism in the form of appointment of a Complaints Officer at establishments. Accordingly, Acuti Labs has appointed Head of HR India as the Complaints Officer for the purposes of this policy, who may be contacted at hr@acutilabs.com, to redress complaints of violations of the law or this policy by Acuti Labs, its affiliates in India or employees of Acuti Labs. The Complaints Officer must register the complaint received from an aggrieved person/complainant. The timeline for the complaint to be filed with the Complaints Officer is 3 months from the date that the complainant became aware of the alleged violation. If the Complaints Officer is satisfied that there were circumstances that prevented the complainant from making the complaint within the stipulated period, an extension of another 3 months should be granted. Every complaint will be made to the Complaints Officer in writing as per the Complaint Form set out below.

## Anti-Discrimination Policy

In addition to the information set out in the Global Handbook, this section provides further detail about your obligations in the UK.

You must not unlawfully discriminate against or harass other people, including current and former staff, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related, and on work-related trips or events including social events.



In the UK, the following characteristics are known as "protected characteristics":

- Age
- Disability
- Gender reassignment

- Marital or civil partner status
- pregnancy or maternity
- Race, colour, nationality, ethnic or national origin
- Religion or belief
- Sex
- Sexual orientation

The following forms of discrimination are prohibited under this policy and are unlawful:

- **Direct discrimination:** treating someone less favourably because of a protected characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay.
- **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular protected characteristic more than others, and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
- **Harassment:** this includes sexual harassment and other unwanted conduct related to a protected characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
- **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment. This includes where someone mistakenly believes that the person victimised has done so.
- **Disability discrimination:** this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

## Recruitment

- Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. When recruiting or promoting, we will aim to take steps to improve the diversity of our workforce and provide equality of opportunity.
- Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.
- Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a protected characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.
- Job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.
- We are required by law to ensure that all employees are entitled to work in the UK. Assumptions about immigration status should not be made based on appearance or apparent nationality. All prospective employees, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation. The list of acceptable documents is available from the HR Department or UK Visas and Immigration.

## **Disabilities**

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can consider what reasonable adjustments or support may be appropriate.

## **Part-time and fixed-term work**

Part-time and fixed-term staff should be treated the same as comparable full-time or permanent staff and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

## **External support for cases of sexual harassment at work**

Support and guidance can be obtained from the HR Department and from the following external services:

- The Equality Advisory and Support Service ([www.equalityadvisoryservice.com](http://www.equalityadvisoryservice.com)*Opens in a new window*).
- Protect ([www.protect-advice.org.uk](http://www.protect-advice.org.uk)*Opens in a new window*).
- Victim support ([www.victimsupport.org.uk](http://www.victimsupport.org.uk)*Opens in a new window*).
- Rape crisis ([www.rapecrisis.org.uk](http://www.rapecrisis.org.uk)*Opens in a new window*).
- Rights of women (England and Wales) ([www.rightsofwomen.org.uk](http://www.rightsofwomen.org.uk)*Opens in a new window*).
- Scottish Women's Rights Centre (Scotland) ([www.scottishwomensrightscentre.org.uk](http://www.scottishwomensrightscentre.org.uk)).