



EQUAL OPPORTUNITY POLICY FOR PERSONS WITH DISABILITIES & TRANSGENDERS



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DOCUMENT REVIEWER

NAME	DESIGNATION	DATE
Pradeep Ramnath	Vice President - Legal	July 1, 2026

DOCUMENT APPROVER

NAME	DESIGNATION	DATE
Gaurav Verma	Senior Vice President - Human Resources, Employee Relations and Operations	July 1, 2026

NEXT REVIEW

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DOCUMENT PRINTING

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1. PURPOSE



The purpose of this Equal Opportunity Policy is to promote an inclusive, equitable and discrimination free workplace where all employees, applicants and contractors including persons with disabilities and transgender persons, are treated with dignity, respect, and fairness.

Jiostar is committed to fostering a diverse, inclusive, and equitable workplace. We affirm our dedication to providing equal opportunity for all employees and applicants, ensuring our operations comply with the provisions of the Rights of Persons with Disabilities (RPwD) Act 2016 and all guidelines set forth by the Chief Commissioner for Persons with Disabilities (CCPD) and the Transgender Persons (Protection of Rights) Act, 2019 and its applicable rules (TPPR).

We further affirm our commitment to providing a workplace that is fully inclusive of transgender persons, recognizing everyone's right to their gender identity and ensuring that transgender employees and applicants are treated with dignity, fairness, and equal opportunity at every stage of their engagement with us. Our goal is to create an environment where all individuals are respected, valued, and empowered to contribute to their fullest potential. We are committed to adhering to the principles outlined in this Policy both in its literal interpretation and in its spirit.

2. SCOPE

The Equal Opportunity Policy is applicable to:

- (a) All employees of Jiostar, including permanent, temporary, contractual, probationary employees, trainees, interns, and apprentices. This includes employees who acquire a disability during their employment, who shall continue to be protected under this Policy and in accordance with applicable law. Further, it equally includes transgender employees and employees who transition their gender identity during the course of their employment, who shall be entitled to the full protections of this Policy without interruption.
- (b) All applicants for employment at every stage of the recruitment and selection process.
- (c) All departments, business units, subsidiaries, affiliates, and operational locations of Jiostar within India.

3. OBJECTIVE

The objective of this Equal Opportunity Policy is to:

- (a) Promote equal opportunity in recruitment, employment, career development, training, promotion and retention.
- (b) Prevent discrimination, harassment, victimization and exclusion
- (c) Foster a culture of diversity, inclusion, accessibility, and respect
- (d) Provide reasonable accommodation to eligible workforce
- (e) Ensure accessibility of workplace infrastructure, communication, technology and services
- (f) Encourage participation and equal representation of persons with disabilities and transgender persons.

4. DEFINITIONS

Person with disability (as per The RPwD Act)

This policy follows definitions as per The Rights of Persons with Disabilities (RPwD) Act, 2016:

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- (a) **Person with disability:** A person with long-term physical, mental, intellectual or sensory impairment which, in interaction with barriers, hinders his/her full and effective participation in society equally with others.
 - (b) **Specified disabilities:** As mentioned in the Schedule of the RPwD Act, including Locomotor disability, Muscular Dystrophy, Leprosy cured, Dwarfism, Cerebral Palsy, Acid attack Victim, Low vision, Blindness, Deafness, Hard of Hearing, Speech and Language disability, Intellectual Disability, Specific Learning Disability, Autism Spectrum Disorder, Mental illness, Chronic Neurological Conditions, Multiple sclerosis, Parkinson's disease, Haemophilia, Thalassemia, Sickle Cell disease, Multiple Disabilities, and any other category as may be notified by the Central Government.
 - (c) **Discrimination in relation to disability:** Any distinction, exclusion, restriction based on disability which is the purpose or effect of impairing or nullifying recognition, enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms and includes all forms of discrimination and denial of reasonable accommodation.
 - (d) **Reasonable accommodation:** Necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden, to ensure persons with disabilities enjoy or exercise equal rights as others.

Transgender person (as per The TPPR Act)

This policy follows definitions as per Transgender Persons (Protection of Rights) Act, 2019 and its applicable rules:

- (a) **Transgender Person:** a person whose gender does not match with the gender assigned to that person at birth, and includes—
 - (i) a trans-man or trans-woman (whether or not such person has undergone Sex Reassignment Surgery or hormone therapy or laser therapy or any other such therapy);
 - (ii) a person with intersex variations, being a person who at birth has a congenital variation in one or more of the following sex characteristics as compared to male or female development:
 - primary sexual characteristics;
 - external genitalia;
 - chromosomal patterns;
 - gonadal development;
 - endogenous hormone production or response, or any other such medical condition; and
 - (iii) any person who has been, by force, allurement, inducement, deceit or undue influence, with or without consent, compelled to assume, adopt, or outwardly present a transgender identity by mutilation, emasculation, castration, amputation, or any surgical, chemical, or hormonal procedure or otherwise.

Provided that this definition shall not include persons with different sexual orientations and self-perceived sexual identities.

- (b) **Gender identity:** Each person's deeply-held, internal experience of their own gender, which may or may not correspond with the sex assigned at birth.
Jiostar affirms every employee's right to self-identify their gender without requiring any medical or legal certification.

5. FACILITIES & AMENITIES

- (a) **Commitment to a Barrier-Free and Inclusive Physical Infrastructure:** As a direct reflection of its commitment to inclusion, Jiostar shall design, construct, and manage all physical facilities to ensure an



accessible environment that meets, and where feasible, exceeds the standards mandated by the Rights of Persons with Disabilities (RPwD) Act, 2016. This commitment is operationalized through a process of continuous review, which incorporates periodic formal assessments and stakeholder feedback.

- (b) **Digital Accessibility:** Reflecting its commitment to an accessible internal digital ecosystem, Jiostar shall ensure all Company-owned digital properties used by employees—including internal portals, business software, collaborative applications, and digital communications—are designed, procured, and maintained in full alignment with the mandates of the RPwD Act, 2016.
- (c) **Commitment to Reasonable Accommodation:** At Jiostar, we believe our strength comes from the diversity of our team. In the spirit of India's Rights of Persons with Disabilities (RPwD) Act, 2016, we are dedicated to creating an environment where every individual has the opportunity to excel. We proactively build a supportive and barrier-free workplace, ensuring every candidate and employee has the tools they need for success. Providing reasonable accommodation is a partnership we value, and we are committed to initiating a confidential and respectful conversation to find the best solutions together.
- (d) **Reporting Accessibility Concerns:** Jiostar is committed to the prompt resolution of any accessibility barriers and encourages employees to report concerns through the appropriate channels. For immediate attention to physical or technical barriers, employees may contact their local Facilities Team or the IT Department, respectively. For any unresolved issues or for any matter pertaining to physical infrastructure, digital accessibility, or reasonable accommodation, employees shall contact the designated Liaison Officer at deijiostar@jiostar.com. The Company will treat all reported concerns with confidentiality and is committed to ensuring a timely review and appropriate action to uphold the principles of this policy.
- (e) **Facilities for Transgender Employees:** Jiostar shall provide unisex toilet facilities, safety and security measures, and hygiene amenities for transgender employees at all work locations, ensuring that every transgender employee can effectively discharge their duties in a safe and dignified environment.

6. POLICY STATEMENT

At Jiostar, our commitment to a truly inclusive workplace is built upon the core pillars of both equality and equity. We believe that while equality provides everyone with the same opportunities, true inclusion requires equity—recognizing that different individuals may need different resources to achieve the same successful outcome. This philosophy is the cornerstone of our 'Inclusive Employee Lifecycle.' Our commitment to inclusivity begins with your first interaction and continues throughout your employee journey.

We ensure career mobility is driven by equitable, merit-based processes that actively dismantle systemic barriers — this means that all decisions relating to recruitment, selection, promotion, compensation, and terms of employment are made solely on the basis of individual skills, qualifications, and performance, irrespective of gender identity, transgender status, disability, or any other protected characteristic, and that all Company policies on service conditions apply equally to transgender employees. By championing both equality and equity, we create a fair and just environment where all employees can grow, contribute, and thrive.

7. LIST OF POSTS IDENTIFIED

Jiostar is committed to equal opportunity for persons with disabilities. While all roles are open, we also proactively identify and earmark specific positions where disability-inclusive hiring is prioritized. We



are committed to regularly reviewing our job roles to ensure accessibility, providing reasonable accommodation wherever required, and fostering inclusive hiring across all functions.

All hiring decisions are made solely on the basis of merit, with candidates assessed objectively on their skills and competencies. We commit to conducting job mapping to identify roles inclusive of different disability types and come up with a list of identified posts / job roles for persons with disabilities. All identified posts for persons with disabilities will be documented and reviewed annually.

8. **MANNER OF SELECTION**

Jiostar is committed to inclusive hiring and actively encourages applications from candidates with disabilities. Jiostar will develop partnerships with specialized disability agencies to broaden outreach and attract talent. All job openings will be published in accessible formats on the Jiostar career site and on other inclusive platforms. Job applicants who need specific adjustment or accommodation in the selection process can contact the concerned recruiter or the Liaison and Complaints Officer.

9. **TRAINING AND AWARENESS**

Jiostar shall periodically conduct training, awareness, and sensitization programmes to promote an inclusive, accessible, and respectful workplace for all employees. These programmes shall focus on enhancing awareness of disability inclusion, the importance of accessibility, and respectful workplace behavior. The training shall aim to foster understanding, eliminate biases and stereotypes, encourage inclusive practices, and equip employees and managers with the knowledge and skills required to support persons with disabilities and transgender persons. Jiostar may periodically review and update the content of these programmes to ensure alignment with applicable laws, organizational values, and evolving best practices in diversity, equity, and inclusion.

10. **ROLES AND RESPONSIBILITY**

- (a) **Human Resources:** Human Resources (HR) shall be responsible for implementing and administering this policy across the organization. HR shall ensure that all information related to employees' disability status, gender identity, gender expression, or any other sensitive personal information is handled with strict confidentiality and in accordance with applicable laws and organizational policies. HR shall establish appropriate mechanisms to address grievances related to discrimination, harassment, or unequal treatment and ensure that such concerns are addressed promptly, fairly, and sensitively. In addition, HR shall organize and facilitate regular awareness, sensitization, and capacity-building programs to promote understanding, respect, and inclusion of persons with disabilities and transgender persons within the workplace.
- (b) **Managers:** Managers shall foster an inclusive, respectful, and equitable work environment by promoting inclusive practices within their teams. They shall ensure that all employees are provided with equal opportunities in recruitment, development, performance management, training, career progression, and workplace participation, without discrimination based on disability, gender identity, or gender expression. Managers are also responsible for preventing discrimination, harassment, and exclusion within their teams and for taking timely and appropriate action to address any concerns that arise.

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- (c) **Employees:** Employees are expected to treat their colleagues with dignity, courtesy, and respect, while embracing diversity and inclusion in the workplace. Employees shall refrain from engaging in any form of discrimination, harassment, bullying, or inappropriate behavior based on disability, gender identity, gender expression, or any other protected characteristic. Employees are encouraged to promptly report any suspected or observed violations of this policy through the prescribed grievance or reporting mechanisms. They shall also actively contribute to maintaining a safe, accessible, respectful, and inclusive workplace for all.

11. GRIEVANCE REDRESSAL – PREVENTION OF HARASSMENT AND DISCRIMINATION

Jiostar is committed to maintaining a professional work environment free from harassment, discrimination, and any other conduct prohibited by law or Company policy.

All employees are required to immediately report any concerns regarding such conduct to their designated HR Business Partner or the Employee Relations department at employee.relations@jiostar.com. The Company will conduct a prompt, thorough, and impartial investigation into all reports. Jiostar strictly prohibits any form of retaliation against an individual for making a good-faith report or participating in an investigation. Full cooperation from all parties is required.

12. LIAISON AND COMPLAINTS OFFICER

In accordance with the Rights of Persons with Disabilities (RPwD) Act, 2016 and the Transgender Persons (Protection of Rights) Act, 2019 and its applicable rules (TPPR), Jiostar has designated a Liaison and Complaints Officer to oversee the implementation of this Equal Opportunity Policy. The Liaison and Complaints Officer serves as the central point of contact for matters related to disability inclusion and for complaints relating to discrimination, harassment, or any violation of the rights of transgender employees and applicants.

Key responsibilities include overseeing accessible recruitment practices, facilitating the reasonable accommodation process, ensuring the provision of necessary facilities for employees with disabilities and receiving and enquiring into complaints from transgender employees and applicants. Employees may contact the Liaison and Complaints Officer, Archana Chopara (Senior Vice President - Human Resources, Learning, Talent Solutions and DEI) for guidance or to discuss matters pertaining to this policy at deijiostar@jiostar.com.

13. RECORDS MANAGEMENT AND CONFIDENTIALITY

Jiostar shall treat all information related to an employee's disability or request for accommodation with the utmost confidentiality and care. An employee must voluntarily disclose their disability if they wish to claim any reasonable accommodation, and all documentation provided for this purpose shall be maintained in a secure, confidential medical file, kept entirely separate from the employee's official personnel file. Access to these confidential files is strictly restricted to authorized personnel, such as designated HR professionals and the Liaison Officer, on a need-to-know basis for the sole purpose of facilitating the accommodation process. This strict separation and limited access ensure employee privacy is protected and that all sensitive information is managed in alignment with the principles of



the Rights of Persons with Disabilities (RPwD) Act, 2016.

The gender identity of every employee shall be kept strictly confidential. No employee's gender identity or transgender status shall be disclosed to colleagues, managers, clients, or any other party without that employee's explicit prior consent.

14. POLICY REVIEW AND MONITORING

To foster a culture that moves beyond compliance, our cross-functional Inclusive Committee periodically reviews this policy for alignment with the Rights of Persons with Disabilities (RPwD) Act, 2016 and the Transgender Persons (Protection of Rights) Act, 2019 and its applicable rules (TPPR). The committee's membership—including representatives from HR, Legal, business units, and employees with disabilities and transgender employees—is essential to this shared commitment. This policy is our promise to create an environment of respect where every individual is empowered to belong, grow, and realize their full potential at JioStar.

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