

TATA DIGITAL TRANSGENDER PERSONS INCLUSIVITY POLICY

1. Policy Statement

Tata Digital Private Limited (including its subsidiaries TATA Payments Limited, TATA Fintech Private Limited, Protraviny Private Limited, Tata Neu Private Limited the “**Company**” or “**we**” or “**our**”) is committed to ensuring that there be no discrimination, harassment or less favorable treatment of any employee or job applicant, either directly or indirectly, on the grounds of gender/ gender identity, and in particular against Transgender Persons (as defined under the Transgender Persons (Protection of Rights) Act, 2019).

2. Version No: Version 1

3. Effective Date: November 7, 2025

4. Objective; Applicability

The objectives of this Transgender Persons Inclusivity Policy (“**Policy**”) are to:

- a. provide equal and fair opportunities for employment to Transgender Persons;
- b. maintain a work environment free from harassment based on gender identity; and
- c. adhere to the Transgender Persons (Protection of Rights) Act, 2019 and the rules thereunder.

This Policy shall be read with the Company’s Equal Employment Opportunity Policy (“**EEO Policy**”) and the Tata Code of Conduct.

This Policy is applicable to Employees (as defined under the EEO Policy).

5. Non-Discrimination

The Company shall not:

- i. discriminate (whether directly or indirectly) against any Employee or job applicant;
- ii. engage in any practices that may constitute unfair treatment of an Employee; or
- iii. take decisions of recruitment, promotion, termination of Employees

on the grounds of gender or gender identity (including such Employee being a Transgender Person).

Notwithstanding any of the provisions of this Policy, no affirmative action policies or positive action measures taken by the Company to improve diversity in our workforce when recruiting and promoting candidates at all levels shall be construed as discriminatory.

6. Facilities; Job Positions; Terms;

Facilities: The Company aims to ensure that its physical infrastructure (such as office premises) are accessible for Transgender Persons as they are for any other Employees, which includes. access to health, safety and amenities as available to other Employees.

Job Positions: All positions in the Company are open for Transgender Persons.

Terms of Employment: All service rules and conditions (including employee benefits) that are provided to Employees of the Company shall be provided, without any discrimination, to all

categories of Employees. All policies and procedures of the Company shall be applicable uniformly to all categories of Employees.

7. Maintenance of records

The Company will collect and maintain data regarding Transgender Persons in relation to their employment, facilities provided and other necessary information as per the Transgender Persons (Protection of Rights) Act, 2019.

All job applicants will be provided the option to provide their gender information at the time of application for employment. During employment employees will continue to have access to edit their information at any time during their tenure. There will be no penalties imposed because she/he did not share this information earlier.

8. Confidentiality

Any records relating to Transgender Persons that specifically relate to their gender status shall at all times be kept confidential by the Company, except in such case where such disclosure is required by any Government officials in relation to compliance with applicable law.

9. Complaint Officer and Redressal Mechanism

The Company has appointed the Chief Human Resources Officer as the Complaint Officer who will be responsible to address all grievances or complaints hereunder and will be also responsible for taking the initiative and providing the requisite support and amenities to Transgender Persons.

The Complaint Officer shall hear all complaints of cases of discrimination and harassment under this Policy.¹ The Complaint Officer will enquire into the complaint and conduct an enquiry after giving an opportunity to the person against whom the complaint is made, to file their reply.

Upon completion of the enquiry, the Complaint Officer shall submit the enquiry report to the head of the establishment, as appointed by the Company, who will take action within the stipulated timelines prescribed under the applicable law.

A summary of the complaints received, and the action taken/conclusion of the complaint shall be presented to the Ethics Committee and the Board of Directors as part of the regular Human Resources report to report the implementation of this Policy, without breaching the confidentiality requirements of applicable law.

On investigation, if the employee against whom the complaint has been made is found guilty of discriminatory behaviour, they will be subjected to disciplinary actions as per company policies.

¹ If there are any complaints of sexual harassment received, they will be forwarded to the Internal Committee (IC) set up in accordance with the requirements of the Sexual Harassment Of Women At Workplace (Prevention, Prohibition & Redressal) Act, 2013.

10. Communication of the Policy

This Policy will be available to all employees via the Company websites and shall be available to all employees through the normal communication channels within the Company.

11. Review and Modifications

The Company reserves the right to review this Policy and vary and/or amend the terms of this Policy from time to time.