



# Equal Employment Opportunity Policy

Document Version: 1.0

---

Policy ID:

**Document Review & Approval History:**

(All revisions made to this document are listed in chronological order)

Version No.	Created by	Date	Changes	Reviewed by	Approved by
1.0	Jitendra B (593) – Human Resources	May 2026	New Policy	Human Resources Head (Sajitha Pillai)	Board of Directors on April 23, 2026

**Ownership:**

Sr. No.	Primary Owner	Secondary Owner
1	Human Resources	

## Table of Contents

1) Preface.....	4
2) Objective.....	4
3) Scope and Eligibility.....	5
4) Procedure.....	5
4.1 Recruitment and Selection .....	6
4.2 Promotion, Transfer, and Training .....	6
4.3 Performance Management and Career Growth.....	6
4.4 Compensation and Benefits .....	6
5) Responsibility.....	7
6) Discrimination Complaint Process:.....	7
7) Exceptions and deviations .....	8
8) Policy Approval.....	<b>Error! Bookmark not defined.</b>
9) Policy Review and Amendments .....	8

## 1) Preface

The Government of India has notified the following enactments viz.,

- “The Rights of People with Disabilities Act, 2016” (RPwD),
- “The Transgender Persons (Protection of Rights) Act, 2019” and
- “The Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Act, 2017” (HIV & AIDS)

which provide protection to the Rights of Persons with Disabilities, Transgender Persons and HIV & AIDS affected persons & protected persons who are employed or otherwise hired by the Company without any discrimination and for matters connected therewith or incidental thereto.

At SBM Bank India (the Bank), we value and celebrate a diverse workforce culture. We are deeply committed to providing equal employment opportunities, fostering an inclusive environment where every individual is treated with dignity and respect. Our belief in inclusivity drives our commitment to growth and business excellence, enabling better development, innovation, and delivery across the organization. We are dedicated to creating a workplace where all employees, representing all sections of society, thrive and contribute to our collective success.

SBM Bank India (the Bank) has framed this Equal Employment Opportunities Policy in compliance with the requirements of aforesaid enactments. Through this policy, the Bank, shall proactively work towards equal opportunity in all aspects of employment including the hiring/selection process, promotions, transfers, provision of training opportunities, compensation, employee benefits and so on.

## 2) Objective

The Bank is committed to the principle of Equal Employment Opportunity (EEO) for everyone. Therefore, it will strive to firmly ensure that access to employment, training, promotion, and treatment of all its employees is:

- Free from any discrimination related to Gender, Gender identity and expression, sexual orientation, race, colour, caste, creed, religion, race, ethnicity, Geographical region, nationality, marital status, disability, HIV status, Transgender persons, Age or other attributes.
- Based solely on the objective assessment of their ability and job-related criteria.

The Bank believes that it is in the organization’s best interest to ensure that the people, talents, and skills available throughout the community are taken into consideration when employment opportunities arise. Hence, the Bank supports, wherever practicable, the development and maintenance of a workforce that broadly reflects the diversity of the communities in which it operates throughout India.

The Bank, through its Equal Employment Opportunity Policy (EEO Policy), along with the support and active participation of its management and employees, will strive to:

- Eliminate obstacles to equal opportunities whenever they are identified.
- Treat employees, applicants, with equal respect and dignity.
- Safeguard employees against any form of workplace discrimination or harassment.
- Hire, promote, and train employees solely based on their merits.
- Provide remuneration and other benefits to employees based on their job responsibility, complexity, professional skills, and location.
- Not tolerate any form of discrimination, including sexual harassment, under any circumstances.

The Bank believes that the absence of discrimination and the promotion of positive attitudes will assist in the most efficient deployment of skills, expertise, and competence.

### 3) Scope and Eligibility

This policy extends to all employees of the Bank, including Fixed Term Employees, Trainees, and Interns.

### 4) Procedure

Acts of workplace discrimination typically fall under one of the following three categories

- **Direct Discrimination:** It occurs when an existing or potential employee is treated less favourably due to their gender, race, caste, colour, creed, religion, sexual orientation, age, marital status, disability, or any other inappropriate/unfair ground. Examples include restricting access to training, promotion, or transfer, sexual harassment, racial abuse, etc.
- **Indirect Discrimination:** It occurs when a condition or requirement, that has a larger effect on a specific individual or a group of employees, is imposed and is not justified by the requirements of their job. Although less obvious, it is equally unacceptable. Examples include setting physical fitness tests irrelevant to the role, requiring certain employees to work on weekends, etc.
- **Victimization/Retaliation:** It occurs when employees who claim or provide evidence supporting a claim of discrimination against the Bank are treated less favourably because of their taking such an action.

The Bank will strive to ensure that all its employment processes and practices facilitate employment and progression within the Bank, based on ability and contribution, and free from any form of discrimination.

To ensure the same, it will implement the following range of supporting processes. Those involved in these processes will be provided with the relevant training to ensure decisions taken are solely based on objective criteria and can be justified.

Its main areas of activity are as follows:

#### **4.1 Recruitment and Selection**

We must identify and appoint the most qualified individuals for the job based on their current skills, abilities, and potential for development. To ensure the same, the following points shall be considered:

- **Role/Person Specification**

Each job role must be specified in terms of its purpose, required skills, experience, and qualifications. The assessment criteria used should be such that are necessary and justifiable for the effective performance of the job and should be applied consistently to all applicants.

- **Advertising**

A range of advertising sources should be utilized to encourage applicants from different groups, which reflects the diverse communities the business operates in. Additionally, all application forms, advertisements, and recruitment literature should include a statement that the Bank is committed to equal opportunities.

- **Selection Criteria and Tests**

Candidate shortlisting should be based on the competencies, skills, and experience that align with the requirements of the job. Additionally, selection tests should specifically relate to job and/or career requirements and measure an individual's actual inherent ability to do the work or train for the career. Additionally, care should be taken to ensure that tests do not discriminate against applicants from particular groups.

#### **4.2 Promotion, Transfer, and Training**

Opportunities for promotions, transfers, and training should be brought to the attention of all eligible employees. Training should be based on identified individual needs matched to the business's requirements and provided in a fair, unbiased manner.

No assumption should be made that an employee is unsuitable for or uninterested in promotion or career development based on their gender, race, caste, colour, creed, religion, marital status, sexual orientation, age, disability, or health.

#### **4.3 Performance Management and Career Growth**

The performance management system should provide for frequent and open discussions between managers and their team members. This helps identify opportunities for career planning, competency development, and personal growth tailored to individual needs and business requirements.

#### **4.4 Compensation and Benefits**

The compensation philosophy should be such that it treats all employees equally and provides fair pay to all. Additionally, all incentives and Variable Pay should be clearly governed by the parameters defined in the Compensation Policy and executed in a fair, equitable manner.

## 5) Responsibility

The effectiveness of the Equal Employment Opportunity Policy (EEO Policy) at the Bank depends on the cooperation of all its employees across all locations and roles.

**Therefore, all CXOs, Functional Heads and Managers are expected to:**

- Familiarize themselves with this policy and act accordingly implement in their day-to-day actions.
- Ensure that the principles of equality of treatment and opportunity are applied in all employment-related situations across the organization.
- Ensure that their employees are aware of the EEO Policy and its obligations.
- Ensure that employees who are entrusted with employment-related decisions are doing so keeping in mind the equal employment opportunities.

**In addition, the Human Resources team is expected to:**

- Develop and maintain processes, guidelines, and practices that operationalise and reinforce the Equal Employment Policy, including periodic review of the EEO policy and associated procedures.
- Effectively administer the EEO Policy and to ensure employees are aware of their responsibilities under the policy.
- Regularly monitor and identify issues and take corrective actions to overcome obstacles in conjunction with supervisors and managers.

**All Employees are expected to:**

- Adhere to the EEO Policy when executing internal/external activities related to their job.
- Act in a manner that reflects the prevalence of equal employment opportunity culture in the organization.

## 6) Discrimination Complaint Process:

Incidents of discrimination should be reported in writing to [speakup@sbmbank.co.in](mailto:speakup@sbmbank.co.in) or to the Human Resource Team.

### 6.1 Investigation, Outcome & Appeal

Once a complaint has been filed, investigation and necessary steps as defined in the Disciplinary policy will be undertaken.

## **6.2 Timelines**

The investigation will be completed, and conclusion shall be arrived at within the timelines defined in the Employee Disciplinary Policy.

## **6.3 Fairness**

All complaints will be investigated in the same manner with the aim of promoting, fairness and equality.

## **6.4 Confidentiality and the Right to Privacy**

The Bank will preserve the confidentiality of all individuals involved in a discrimination complaint. Preservation of confidentiality may be affected by the Bank's duty to prevent discrimination in/at the Bank and by the alleged respondent's right to know the nature of the complaint being made against them and who has made it so that they can respond. If the investigation fails to find evidence to support the complaint, no documentation concerning the complaint will be placed on the file of the respondent.

## **6.5 Record Keeping**

The Bank will maintain accurate and secure records of all disciplinary proceedings, including incident reports, investigation findings, hearing outcomes, and disciplinary actions taken. These records will be retained for a maximum of 5 years or as required by the law, with access restricted to authorized personnel only. Confidentiality will be always upheld to protect employee privacy, and periodic reviews will ensure records are complete and compliant with the regulatory requirements.

## **7) Exceptions and deviations**

The exceptions and deviations to this policy will be approved by the MD & CEO.

## **8) Policy Review and Amendments**

This EEO Policy will be reviewed periodically, at least once every year, or as required due to changes in regulatory requirements, business needs, or industry best practices.

Amendments to the policy will be proposed by the Human Resources Department and approved by the Board of Directors. The Bank reserves the right to make amendments to this policy to ensure ongoing legal compliance and alignment with business practices.