

ACME SOLAR HOLDINGS LIMITED

EQUAL EMPLOYMENT, ANTI-DISCRIMINATION & INCLUSION POLICY

1. Introduction

ACME Solar Holdings Limited (“ACME” or “Company”) is committed to providing equal employment opportunities and maintaining a workplace that is free from discrimination, harassment, and unfair treatment. The Company recognises that diversity of background, perspective and experience enhances innovation, strengthens governance, and contributes to long-term sustainable value creation. Employment decisions at ACME shall be based solely on merit, competence, performance, and business requirements.

2. Purpose

The purpose of this Policy is to affirm the Company’s commitment to fostering a fair, inclusive, and equitable workplace where all individuals are treated with dignity and respect. It aims to prevent discrimination, promote equal employment opportunities, and ensure that all employment related decisions are based solely on merit, competence, and business requirements.

3. Applicability

This Policy applies to: (a) all employees (permanent, contractual, trainees and interns) and directors of the Company; (b) employees and directors of subsidiaries and entities where the Company exercises management or operational control, to the extent applicable; and (c) contractors, suppliers, service providers and other third parties authorised to represent the Company or its subsidiaries in interactions with government authorities, regulators, industry associations or public institutions.

4. Guiding Principles

ACME commits to the following guiding principles for providing equal employment opportunities and maintaining a workplace that is free from discrimination, harassment, and unfair treatment:

- a. **Legal & Regulatory Framework:** The Company commits to comply with all applicable Indian laws and regulatory expectations, including:
 - i. Rights of Persons with Disabilities Act, 2016 and Rules made thereunder;
 - ii. Transgender Persons (Protection of Rights) Act, 2019;
 - iii. Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013;
 - iv. HIV & AIDS (Prevention and Control) Act, 2017;
 - v. Code on Wages, 2019 (including principles relating to equal remuneration);
 - vi. Companies Act, 2013
 - vii. SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and BRSR framework;
 - viii. Applicable labour, employment, anti-discrimination and data protection laws in force from time to time.

All references to statutes and regulations shall be deemed to include any statutory modification, re-enactment or amendment thereof for the time being in force. In the event of any inconsistency between this Policy and applicable law, the provisions of such law shall prevail.



Leading Through Innovation

- b. **Equal Employment Opportunity:** ACME shall not discriminate in recruitment, hiring, compensation, promotion, training, transfers, benefits or separation on the basis of:
- i. Gender, gender identity or expression
 - ii. Sexual orientation
 - iii. Religion or belief
 - iv. Caste, race, ethnicity or nationality
 - v. Age
 - vi. Marital or family status
 - vii. Disability
 - viii. Medical condition (including HIV status)
 - ix. Socio-economic background
 - x. Any other characteristic protected by law

All recruitment and employment decisions shall be based on objective job-related criteria.

- c. **Equal Pay for Equal Work:** In accordance with applicable law, ACME is committed to ensuring equal remuneration for work of similar nature performed under similar conditions, subject to experience, skill, performance and role requirements.

d. **Equal Opportunity for Persons with Disabilities**

- i. Non-Discrimination: The Company shall not discriminate against qualified individuals with disabilities in employment or career progression.
- ii. Reasonable Accommodation: Reasonable accommodation shall be provided, where required, to enable employees with disabilities to effectively discharge their responsibilities, subject to feasibility and business requirements. Accommodation may include, as appropriate: assistive devices or technological support; workplace modifications; flexible work arrangements; and adjustments in evaluation or training processes.
- iii. Accessibility: The Company endeavours to progressively enhance accessibility at its corporate offices and key operational locations, including: barrier-free access, where feasible; accessible common facilities; and digital accessibility of HR and employee systems. Accessibility improvements may be undertaken in a phased manner based on operational feasibility.
- iv. Confidentiality: Information relating to disability or medical condition shall be treated as sensitive personal data and handled in accordance with applicable data protection laws.

- e. **Prevention of Harassment & Retaliation:** ACME maintains zero tolerance for discrimination, harassment or victimisation. An Internal Committee is constituted under the PoSH Act. Employees may also raise concerns under the Company's Vigil Mechanism / Whistle Blower Policy. Retaliation against individuals raising concerns in good faith is strictly prohibited.

5. **Reporting and Grievance Redressal Mechanism**

Any person covered by this Policy who wishes to raise a concern or report a potential violation of this Policy may do so by contacting the Company's Compliance Officer or through the Company's established grievance redressal mechanism, as communicated from time to time. The Company shall endeavour to address all concerns in a fair, timely, and confidential manner. No person shall be subject to retaliation for raising a concern in good faith.

6. Governance and Implementation

The Board of Directors is responsible for the approval and oversight of this Policy. The Corporate Social Responsibility and Sustainability Committee of the Board shall oversee the implementation of this Policy and review its effectiveness periodically. Senior management and the relevant functional heads shall be responsible for operationalising this Policy across the Company's operations and ensuring compliance with its requirements.

7. Review and Amendment

This Policy is approved by the Board of Directors of ACME. This Policy shall be reviewed periodically, or earlier if warranted by changes in applicable laws, regulations, business operations, or stakeholder expectations. Any material changes to this Policy shall be subject to the approval of the Board of Directors.

8. Version History

Date of Board Approval	Particulars	Effective Date
27 th March 2026	Introduction and implementation of Equal Employment, Anti-Discrimination and Inclusion Policy	27 th March 2026