

EQUAL EMPLOYMENT OPPORTUNITY POLICY

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Classification: Schwab Internal

Statement of Policy

The Equal Employment Opportunity Policy (**Policy**) includes the employment policies and procedures applicable to all Eligible Persons (see **Definitions**) as an Equal Opportunity Employer. The Company (see **Definitions**) promotes and supports a diverse workforce at all levels. The Company believes that Diversity and Inclusivity (**D&I**) at the workplace is an instrument for growth and values the uniqueness of every individual by fostering an environment of inclusion and empowerment.

The Company ensures that Eligible Persons are not unlawfully discriminated against, directly or indirectly, as a result of their race, caste, color, ethnicity, religion (including religious dress and grooming practices), sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), gender, gender identity or expression, transgender status, national origin (including language use restrictions), ancestry, age, disability (physical and mental) HIV/AIDs status, legally protected medical conditions (such as genetic characteristics, cancer or a record or history of cancer), genetic information, marital status, sexual orientation, veteran status (including disabled veterans, recently separated veterans, active duty wartime or campaign badge veterans and armed forces service medal veterans), spouse of a protected veteran, military status, citizenship status or any other trait or status that is protected by law.

Notwithstanding the generality of the foregoing, this Policy also aligns with applicable provisions of the Code on Wages, 2019, the Industrial Relations Code, 2020, the Code on Social Security, 2020, and the Occupational Safety, Health and Working Conditions Code, 2020, the Rights of Persons with Disabilities Act, 2016 read with the Rights of Persons with Disabilities Rules, 2017 ("**RPWD Act**"), the Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control)

Act, 2017 read with the Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Rules, 2018 (“**HIV/AIDs Act**”), and the Transgender Persons (Protection of Rights) Act, 2019 (“**Transgender Persons Act**”) read with the Transgender Persons (Protection of Rights) Rules, 2020 (collectively, the “**Equal Opportunity Laws**”).

Purpose

The purpose of this Policy is to provide for equal opportunities in all aspects of employment with the Company. The Company provides equal employment opportunities to all Eligible Persons without regard and prejudice to their Protected Status. The Company is committed to an inclusive workforce which brings new perspectives, productive solutions, and an added ability to serve the Company’s increasingly diverse client base.

Scope and Applicability:

The Policy is applicable to all Eligible Persons and to all aspects related to the terms and conditions of their employment / engagement, including, but not limited to, recruitment, hiring, retention, promotion, transfer, training, compensation, benefits, leave of absence, layoff, recall, and termination. Employment decisions are based on merit, qualifications, performance, competence, and the Company's business needs and the Company will not tolerate any behaviour that is discriminatory or behaviour that victimizes any individual or group. The Policy is consistently applied throughout the period of employment of the individual, from the recruitment process until separation of employment. This Policy supersedes any previous policy / communication on this subject.

Equal Opportunity for All Persons:

In accordance with the provisions of the Equal Opportunity Laws, it is the Company’s Policy to ensure that the work environment is free from any discrimination against all Eligible Persons including Persons with Disabilities, HIV/AIDs and Transgender individuals so that they can perform their role with full efficiency and excel in the same. The Company shall provide all Eligible Persons with the necessary facilities, amenities (including transportation) and training to support them as appropriate and enable them to effectively discharge their duties for which they are employed.

Discrimination occurs when a person is treated unfavourably because of a certain attribute. This Policy prohibits any discrimination or harassment that is based on an individual’s Protected Status in respect to the same work or work of a similar nature done by any Eligible Person. In particular, the Policy prohibits discrimination on the following matters (without limitation):

- remuneration payable
- during hiring process while recruiting
- in any condition of service subsequent to recruitment (such as promotions, training, night shifts, representation or transfer, unless the law specifically prohibits or limits the employment of women in certain roles)

‘Same work or work of similar nature’ means work in respect of which the skill, effort, experience and responsibility required are the same, when performed under similar working conditions by

Eligible Persons and the difference if any, between the skill, effort, experience and responsibility required for Eligible Persons of any gender, are not of practical importance in relation to the terms and conditions of employment.

All decisions with respect to recruitment, remuneration and conditions of service shall be solely based on the Company's operating requirements and merit of the Eligible Person, including, but not limited to qualifications, experience, ability, availability, co-operation and job performance.

Resolving Workplace Issues

If an Eligible Person feels they are being subjected to discrimination, harassment, bullying or victimization, they can raise the grievance as per the Resolving Workplace Issues policy of the Company which will be addressed as per the applicable law and where required under the law, by the complaints officer appointed under this policy. All grievances and complaints will be taken seriously and treated with sensitivity and fairness

Equal Opportunity for Persons with Disability

The Company does not discriminate on the grounds of disabilities (as defined under the RPWD Act). The Company provides a nurturing work environment where the Eligible Persons are treated with dignity and respect and are provided with safe and humane work conditions.

In particular, the Company commits to carrying out the provisions of the RPWD Act in spirit of providing specific opportunities in identified positions where they could be employed. Company would also provide the Eligible Persons with necessary facilities, amenities and training to support them as appropriate and enable them to effectively discharge their duties for which they are employed. The disabilities under consideration are as specified in this Policy.

Hiring and Meritocracy

The Company adopts a transparent selection process based on professional experience and qualifications and without any bias to disabilities of the prospective candidate. Eligible Persons with Disabilities who apply for a position are measured against the key selection criteria with reasonable adjustments. The key selection criteria shall only include the specific skills, knowledge and abilities that are essential to perform the job. [The Company will identify and post open positions that are suitable for Eligible Persons with Disabilities.] OR [All positions are open to Eligible Persons with Disabilities. Accommodations are available on request for applicants taking part in all steps of the selection process. Hiring is purely based on merit, and candidates are evaluated based upon their skill and competence.]

The Company has adopted an inclusive performance evaluation process by ensuring that an Eligible Person with Disabilities is provided with any suitable flexibility and accommodation that may be required so that his / her performance may be evaluated fairly.

Reasonable Accommodation, Transport & Other Facilities:

The Company encourages the provision of Reasonable Accommodations (modifications or adjustments to a job or the work environment, to the extent required under the RPWD Act) to ensure

that an Eligible Person with Disability can perform the essential functions of their positions. What constitutes a Reasonable Accommodation may depend on many factors including, but not limited to, the nature of disability and the essential functions of the position.

The Company will provide high support and Reasonable Accommodations in accordance with the standards prescribed under the RPWD Act. Please note that these accommodations will be request-based, initiated through an email to the accommodations.schwabindia@schwab.com, and are subject to internal approvals.

- **Digital Infrastructure:** In terms of technology, wherever possible, the Company will make all documents, employee handbook, policies / procedures, communication, and information technology systems adheres to the accessibility standards prescribed by applicable laws for Eligible Persons with Disabilities.
- **Physical Infrastructure:** Wherever possible, the Company's physical infrastructure (e.g., buildings, furniture, facilities, and services in the building / campus and transportation) adheres to the accessibility standards as prescribed under the RPWD Act. In terms of physical infrastructure, accessible entrances, earmarked accessible parking spaces, accessible washrooms, accessible lifts, and interiors, are provided.
- **Travel & Transport:** Wherever possible, adequate transport facilities may be provided to Eligible Persons with Disabilities for official travel on a case-to-case basis. While on official travel, Eligible Persons with Disabilities may submit an email request for Reasonable Accommodation to the travel team.
- **Events & Meetings:** Wherever possible, the Company will make all Company events and meetings inclusive by ensuring that the events and meetings are conducted at accessible venues with Reasonable Accommodation being made available to Eligible Persons with Disabilities.

Eligible Persons with disability shall not be compelled to partly or fully pay the costs incurred for Reasonable Accommodation. Escalations of any unresolved issues can be directed to the Liaison Officer.

Leave

The Company's leave policies will be applicable to Eligible Persons with Disabilities. An Eligible Person's request for an additional leave of absence for a reason related to their disability will be considered on a case-to-case basis.

Any request for an additional leave for a reason related to any disability (as identified by the Company under this Policy), will be evaluated on factors including, but not limited to, the job profile of the Eligible Person with Disability, the effect of such contingency on their ability to perform the duties and any other business needs. Accordingly, the Company may grant leave for such duration as it may deem fit.

Training and Awareness

Training opportunities shall be made available to all Representatives to ensure awareness, reduce stigma and foster respectful and inclusive behaviour among all Representatives. Alternate formats such as the use of readers or adapted materials shall be facilitated, where required, for Persons with Disabilities.

Appointment of Liaison Officer

The Company has appointed a liaison officer, who is responsible for the recruitment of Eligible Persons with Disabilities and making provisions of facilities and amenities for Eligible Persons with Disabilities, in compliance with the RPWD Act.

If an Eligible Person with Disabilities feels they are being subjected to discrimination, harassment, bullying or victimization, they can raise the grievance as per the Resolving Workplace Issues policy of the Company. The liaison officer will be involved during the process. The liaison officer can be contacted at **MyHR@schwab.com**.

If the Company's management receives a complaint from an Eligible Person with Disability regarding discrimination on the ground of disability, the management shall:

- initiate action in accordance with the provisions of the RPWD Act; or
- inform the aggrieved Eligible Person with Disability in writing as to how the impugned act or omission is a proportionate means of achieving a legitimate aim.

Submission of Disability Certificate

Eligible Persons with Disabilities will be required to confirm their disability with appropriate documentation including certification or documents from appropriate medical / government authorities. The Company also reserves the right to require employees to undergo a medical examination, including through empaneled medical personnel, where reasonably required, including for the purposes of understanding the nature of the disability, assessing any reasonable accommodation that may be required, or otherwise giving effect to the provisions of this Policy.**Equal Opportunity for Transgender Persons**

The Company is committed to carrying out the provisions of the Transgender Persons Act in letter and spirit providing opportunities to Transgender Persons. The Company does not discriminate against any Eligible Person who is a Transgender Person in any matter relating to employment / engagement, including, but not limited to, infrastructure adjustments, recruitment, hiring, retention, promotion, transfer, training, compensation, benefits, leave of absence, layoff, recall, and termination.

As per the provisions of the Transgender Persons Act, the Company will implement all measures for providing a safe working environment, infrastructural facilities and amenities to Transgender Persons to effectively discharge their duties in the establishment.

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Infrastructure & Other Facilities

The Company shall provide adequate infrastructural facilities such as unisex toilets for the Transgender Persons. Appropriate measures, such as provision of transportation and guards, shall be taken for their safety and security. Amenities such as hygiene products shall be provided to the Transgender Persons to enable them to effectively discharge their duties.

Disclosure

Eligible Persons, who are Transgender Persons, will be required to inform the Company of them being Transgender Persons and produce appropriate documentation including certification from appropriate government authority to confirm their gender identity. The Company is committed to ensuring confidentiality of the gender identity of such Eligible Persons.

Appointment of Complaints Officer

In line with the Transgender Persons Act, the Company has a well-defined grievance redressal mechanism. The Company has appointed a complaints officer, who is responsible for addressing complaints received from Eligible Persons, who are Transgender. The complaints officer can be contacted at ***MyHR@schwab.com***.

Equal Opportunity for HIV/AIDs Protected Persons

The Company is committed to carrying out the provisions of the HIV/AIDs Act in letter and spirit providing opportunities to HIV/AIDs Protected Persons. The Company does not discriminate against any Eligible Person who is an HIV/AIDs Protected Persons any matter relating to employment / engagement, including, but not limited to, infrastructure adjustments, recruitment, hiring, retention, promotion, transfer, training, compensation, benefits, leave of absence, layoff, recall, and termination.

Confidentiality

All employees shall have the right to disclose or not disclose their HIV/AIDS status. All information regarding any protected characteristic will be kept strictly confidential in accordance with the applicable protection measures.

Appointment of Complaints Officer

In line with the HIV/AIDs Act, the Company has a well-defined grievance redressal mechanism. The Company has appointed a complaints officer, who is responsible for addressing complaints received from Eligible Persons, who is an HIV/AIDs Protected Person. The complaints officer can be contacted at ***MyHR@schwab.com***.

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Model Policy under the HIV/AIDS Act:

All employees are required to familiarize themselves with the Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome Policy for Establishments, 2022 ("Model Policy") notified under the HIV/AIDS Act. The Model Policy can be accessed [here](#).

Communication of the Policy

The Company shall make the Equal Employment Opportunity Policy available to all the Representatives via the Employee Handbook, the Company's website, and by displaying in conspicuous places on the Company premises.

Policy Standards

Standards, roles and responsibilities of the stakeholders with respect to this Policy are listed below:

- Key business partners, including, but not limited to, Legal, Government Affairs,

Compliance and Benefits will ensure that requirements of this Policy are consistent with all applicable central, state and local laws, and any relevant regulatory mandates. In some instances, Policy provisions may be more generous than statutorily required.
- This Policy will be reviewed on a regular basis, and any revisions or modifications will be made accordingly to ensure ongoing accuracy and compliance.

Procedures

Not applicable to this Policy.

Roles & Responsibilities

It is the responsibility of all Representatives to understand and adhere to the requirements of this Policy.

- It is the responsibility of Eligible Persons to bring the accommodation request to the attention of the concerned authorities.
- [It is the responsibility of the Company to ensure that a copy of this Policy is registered with the State Commissioner, in alignment with the provisions of the RPWD Act.]
- Eligible Persons with Disabilities are requested to voluntarily report the existence of a disability to the Company at the time of joining the Company, to ensure protection of their rights under this Policy. In compliance with the RPWD Act, the Company is required to maintain records of all such Persons with Disabilities, including their respective dates of joining, name, gender and address, nature of disability, and the nature of work performed as voluntarily declared by the Eligible Persons. Such Eligible Persons need to provide voluntary consent to the Company to

obtain and retain such sensitive personal data for the Company's compliance with the applicable laws. The format is also captured in Annexure A to this policy.

- [Eligible Persons qualifying as Transgender Persons are requested to provide a certificate of identity issued by the District Magistrate under the Transgender Persons Act, to the Company at the time of joining the Company, to ensure protection of their rights under this Policy. Such Eligible Persons need to provide voluntary consent to the Company to obtain and retain such sensitive personal data for the Company's compliance with the applicable laws.]
- Any information shared by an Eligible Person on disability, medical condition (including HIV/AIDs status), or gender identity will be maintained by the Company in a confidential manner except if required to be disclosed as per applicable law. Personal data will be accessed or disclosed only to those individuals who are required to know such information to accomplish the Company's legitimate business purpose or to enable the Company to comply with applicable legal requirements only.
- Management is responsible for overseeing the actions and behaviour of Representatives and raising concerns to the next level of management and / or Human Resources as necessary.

Definitions

Company

Refers to Charles Schwab Services India Private Limited.

Eligible Persons

Eligible Persons refers to all Representatives of the Company including Persons with Disabilities, Transgender Persons, Persons with HIV/AIDs and / or persons who enjoy any other Protected Status.

Persons with Disability

A person with long term physical, mental, intellectual or sensory impairment which, in interaction with barriers, hinders his full and effective participation in society equally with others. The disabilities covered under this Policy include, but are not limited to:

- Blindness
- Low vision
- Leprosy cured persons
- Hearing impairment
- Locomotor disability
- Dwarfism

- Intellectual disability
- Mental illness
- Autism Spectrum disorder
- Cerebral Palsy
- Muscular dystrophy
- Chronic Neurological conditions
- Specific Learning disabilities
- Multiple sclerosis
- Speech and language disability
- Thalassemia
- Haemophilia
- Sickle cell disease
- Parkinson's disease
- Multiple disabilities including deaf blindness
- Acid attack victims

Protected Status

Protected Status includes race, colour, caste, ethnicity, religion (including religious dress and grooming practices), sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), gender, gender identity or expression, transgender status, national origin (including language use restrictions), ancestry, age, disability (physical and mental) HIV and AIDS status, legally protected medical conditions (such as genetic characteristics, cancer or a record or history of cancer), genetic information, marital status, sexual orientation, veteran status (including disabled veterans, recently separated veterans, active duty wartime or campaign badge veterans and armed forces service medal veterans), spouse of a protected veteran, military status, citizenship status or any other trait or status that is protected by law.

Reasonable Accommodations

As defined in RPWD Act, a necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden in a particular case, to ensure to Persons with Disabilities the enjoyment or exercise of rights equally with others.

Representatives

Representatives refers to all persons employed / engaged, to be employed / engaged or formerly employed / engaged by the Company including, but not limited to, employees, consultants, independent contractors, trainees, volunteers, probationers and job applicants, for any kind of work whether: (i) directly by the Company or through an agent or contractor; (ii) on a regular, temporary, ad hoc, or daily wage basis; (iii) for remuneration or not; and (iv) the terms of engagement or employment are express or implied.

Transgender Person

(i) A person having such socio-cultural identities as kinner, hijra, aravani and jogta, or eunuch, or a person with intersex variations specified below or 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:--

- a) primary sexual characteristics;
- b) external genitalia;
- c) chromosomal patterns;
- d) gonadal development;
- e) endogenous hormone production or response, or such other medical conditions; or

(ii) any person or child who has been, by force, allurements, inducement, deceit or undue influence, either 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 it shall not include, nor shall ever have been so included, persons with different sexual orientations and self-perceived sexual identities.

HIV / AIDS protected person

A person who is (i) HIV-Positive; (ii) ordinarily living, residing or cohabiting with a person who is HIV-positive person; or (iii) ordinarily lived, resided or cohabited with a person who was HIV-positive.

Policy Exceptions

Not applicable to this Policy.

Policy Violations & Escalation

All violations of this Policy must be promptly brought to the attention of management or to Human Resources. Consequences of non-compliance with this Policy may result in disciplinary action in accordance with the applicable Company policies.

Related Reporting

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Not applicable to this Policy.

Policy Modifications

The Company reserves the right to update, modify or decommission policies at any time with or without notice.

Related Policies and Supplements:

- Accommodations Policy
- Prevention of Sexual Harassment Policy
- Preventing Harassment and Discrimination Policy
- Diversity and Inclusion

Next Review Date

Last Reviewed or Revised Date	Next Review Date
4/1/2026	1/1/2027

HR Policies

The HR policies of the Company currently apply to all Representatives. In the event that a policy doesn't apply to all Representatives or is also applicable to other individuals, it will be clearly noted. This Policy is intended to supplement and be read in conjunction with all policies of the Company which are applicable to the Company and its affiliates.

ANNEXURE A: Self-Identification Form for Persons with Disabilities

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iForms Center

Form AT: Voluntary Self-Identification of Disability (pre-offer)

Form CC-305Voluntary Self-Identification of DisabilityOMB Control Number 1250-0005Expires 06/30/2026

Name

Date

Employee ID

7/9/2026

Why are you being asked to complete this form?

We are a federal contractor or subcontractor. The law requires us to provide equal employment opportunity to qualified people with disabilities. We have a goal of having at least 7% of our workers as people with disabilities. The law says we must measure our progress towards this goal. To do this, we must ask applicants and employees if they have a disability or have ever had one. People can become disabled, so we need to ask this question at least every five years.

Completing this form is voluntary, and we hope that you will choose to do so. Your answer is confidential. No one who makes hiring decisions will see it. Your decision to complete the form and your answer will not harm you in any way. If you want to learn more about the law or this form, visit the U.S. Department of Labor's Office of Federal Contract Compliance Programs (OFCCP) website at www.dol.gov/ofccp.

How do you know if you have a disability?

A disability is a condition that substantially limits one or more of your "major life activities." If you have or have ever had such a condition, you are a person with a disability. **Disabilities include, but are not limited to:**

- Alcohol or other substance use disorder (not currently using drugs illegally)
- Autoimmune disorder, for example, lupus, fibromyalgia, rheumatoid arthritis, HIV/AIDS
- Blind or low vision
- Cancer (past or present)
- Cardiovascular or heart disease
- Celiac disease
- Cerebral palsy
- Deaf or serious difficulty hearing
- Diabetes

- Disfigurement, for example, disfigurement caused by burns, wounds, accidents, or congenital disorders
- Epilepsy or other seizure disorder
- Gastrointestinal disorders, for example, Crohn's Disease, irritable bowel syndrome
- Intellectual or developmental disability
- Mental health conditions, for example, depression, bipolar disorder, anxiety disorder, schizophrenia, PTSD
- Missing limbs or partially missing limbs
- Mobility impairment, benefiting from the use of a wheelchair, scooter, walker, leg brace(s) and/or other supports

- Nervous system condition, for example, migraine headaches, Parkinson's disease, multiple sclerosis (MS)
- Neurodivergence, for example, attention-deficit/hyperactivity disorder (ADHD), autism spectrum disorder, dyslexia, dyspraxia, other learning disabilities
- Partial or complete paralysis (any cause)
- Pulmonary or respiratory conditions, for example, tuberculosis, asthma, emphysema
- Short stature (dwarfism)
- Traumatic brain injury

Please check one of the boxes below:

☐ Yes, I have a disability, or have had one in the past

☒ No, I do not have a disability and have not had one in the past

☐ I do not want to answer

PUBLIC BURDEN STATEMENT: According to the Paperwork Reduction Act of 1995 no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. This survey should take about 5 minutes to complete.

Signature

7/9/2026 6:14 AM