



DIVERSITY, EQUITY, AND INCLUSION (DE&I) POLICY

Document Name	DE&I Policy
Release Date	03/07/2023



Confidentiality Agreement

This document is copyrighted, and all rights are reserved. This document shall not, in whole or in part, be copied, photocopied, reproduced, translated, or reduced to any electronic medium or machine-readable form without prior consent, in writing, from an authorized representative of Organization. This document is for internal use only and shall not, in whole or in part, be provided to anyone outside of Organization, including customer, clients, or prospects.



1. Introduction

Fractal is committed to fostering a workplace where all employees are treated fairly and with respect, where they are encouraged to fully participate and bring their whole selves to work every day. To that end, we have developed this Diversity, Equity and Inclusion Policy that applies to all employees, regardless of their race, gender identity, sexual orientation, religion, age, disability, socio economic or health status (including perceived or real HIV status) or any other characteristic that makes our employees, clients, and vendors unique.

At Fractal, our understanding of DEI encompasses the following principles:

- Diversity: Representation of individuals with varied attributes, needs, backgrounds, and perspectives.
- Equity: Committed to building fairness in our processes to ensure everyone has equal access to Fractal's opportunities, resources, and benefits.
- Inclusion: Enable an environment where everyone feels respected, valued, and empowered to reach their full potential.

2. DEI Vision

To foster a culture where everyone feels belonged and empowered to live their full potential, enabling us to effectively power every human decision in the enterprise so the human mind can be free to imagine audacious possibilities that can transform human life across the planet.

Our aim is to build a great place to work for all and be committed to:

- Encouraging diversity where multiple identities are represented.
- Embracing differences and uniqueness of thoughts, ideas, and perspectives of everyone.
- Constantly and consistently recognize and redistribute opportunities, resources, and benefits.
- Unlock the full potential of everyone, foster innovation, and integrate diverse perspectives, beliefs, and values.

3. Mission Statement

Fractal recognises that an inclusive and diverse workforce will help us attract and retain the best people from the widest pool of available talent. Furthermore, we believe that diversity improves the quality of decision-making and thus enhances our capacity to create value.

Diversity, Equity, and Inclusion at Fractal means valuing an individual regardless of their gender, marital or family status, sexual orientation, gender identity, age, disability status, ethnicity, religious beliefs, cultural background, country of origin, veteran, or military status, socio-economic or health status (including perceived or real HIV status), perspective, and experience. We believe an inclusive and diverse business environment encourages a range of perspectives and fosters excellence in the creation of value for our clients and ourselves.

We recognise that by fostering and nurturing a culture of diversity, equity, and inclusion we can achieve superior business results. Our goal is to attract, develop and retain individuals from all backgrounds where everyone is respected, treated fairly, and has an opportunity to achieve work-life effectiveness and excel in their chosen careers at Fractal.

4. Policy Statement

- This Policy explains our approach to building inclusion and diversity across the organisation.
- It encompasses recruitment, pay, promotion, learning and development and other areas of employment at Fractal, with an approach to build merit-based decisions.

5. Supporting Policies

1. Equal Employment Opportunity

Fractal is an “equal opportunity” organization that prohibits discrimination and harassment based on gender, race, colour, religion, creed, national origin, sex, age, sexual orientation, gender identity, language, marital or family status, citizenship status, veteran or military status, socio economic or health status (including perceived or real HIV status) or disability.

2. Inclusion, mutual trust, and respect

Fractal will treat all individuals fairly and impartially, without prejudice, and not tolerate harassment including and not limited to - proximate, virtual, direct/indirect, insinuated or through community based.

Collaboration and commitment to each other requires an environment of openness, honesty, mutual trust, and respect. We are committed to developing a working culture that is fair and 'inclusive' - enabling all employees to make their distinctive contributions to the benefit of the business. We are continuously working to build the same openness to our suppliers, business partners and all our customers. We are working with our managers to exercise leadership in this field by discouraging prejudice and by learning to role model appropriate behaviour.

3. Confidentiality

We appreciate that personal information of employees received by Fractal is sensitive and confidential in nature. We consider it as our moral responsibility to ensure prevention of unintended or unwanted disclosure and breach of confidentiality of the personal information received from co-workers and staff member.

4. Harassment

We do not tolerate harassment or unfair discrimination in our work environments. This means being committed to building a workplace that sets them our people for success and is free of discrimination and harassment – any conduct, comment, gesture, graphic, or contact that causes offence or humiliation. Consequences associated to such behaviour could result in a variety of disciplinary actions, including but not limited to termination or legal proceedings.

6. Responsibilities

At Fractal, it is everybody’s responsibility to contribute towards enabling a diverse, equitable and inclusive culture. These responsibilities include but are not limited to:

- Acknowledging and respecting diversity of all people.
- Enabling an inclusive environment that is free from discrimination, harassment or bullying even if it was not the intent.
- Committing to taking appropriate measures to stop any direct or indirect bullying, harassment, or discrimination.
- Permit and encourage representation of diverse thoughts and perspectives.
- Promote equity in employment decisions and talent practices.

7. Building an Inclusive and Diverse Organisation

At Fractal, we are working towards building inclusion and diversity throughout the organisation. We are working towards improving diversity through measuring our progress against agreed targets, regular reporting, and other DEI initiatives. We intend to build people policies, systems and practices that will support an inclusive culture.

Employee Engagement

Frequent engagement with our employees through various listening platforms that empowers all Fractalities with the voice to share their concerns, engage in dialogues and resolve concerns as full members of the organization.

Talent Acquisition

In line with our philosophy to build talent, we firmly believe that hiring for culture-fit enables us to hire for Fractal first and then the role. Our recruitment and selection practices intend to mitigate any conscious or unconscious biases that might discriminate against any candidate. All our interviewers continue to be trained through Fractal's Interviewer Certification Program.

Learning and Development

Fractal strives to offer careers that broaden and deepen skills, abilities, and knowledge. We continue to design and implement programs for all employees which will assist in their development and create broad and diverse pool of skilled and experienced employees.

Compensation

Fractal strives to ensure pay equity across our diverse workforce regardless of their race, gender identity, sexual orientation, religion, age, disability, socio economic status, or any other characteristic.

Design an Agile/Hybrid Workforce

We strive to create an environment that allows every Fractalite the freedom to leverage work policies in a way that best enables their success at Fractal irrespective of their gender, location, ethnicity, or any other demographic classification. We understand that everyone's need within larger cohorts may be different, and our work policies are designed in a way that allows everyone individual flexibility while still working under organization level guidelines.

Promotions and Mobility

The philosophy of fairness in talent evaluation is also deeply embedded in our Promotion Process. We seek to continuously improve our promotion processes to ensure that all eligible Fractalites are given an opportunity to represent their candidature with minimized biases.

Physical or Virtual Workspace Inclusion

We are committed to holistic wellbeing of Fractalities. There is a strong focus to ensure active listening and implementing initiatives aimed at building a sense of holistic wellness and fulfilment.

- All Fractalities can avail **free counselling support** through our EAP partners to address their mental well-being needs.
- Feedback and action circle are created through our **regular people connects** with People Managers, HCBPs, Skip Level Meetings, and the Chief People Officer.

8. Prohibition of Retaliation

It is Fractal's policy and practice to maintain the highest ethical standards, and to create a workplace free of inappropriate or unlawful behaviour, in which people are encouraged to share their concerns with the company without fear of retaliation. Consequently, at Fractal, no adverse action will be taken against any employee, former employee, agent or third party for complaining about, reporting, participating, or assisting in the investigation of a suspected violation of the Company's Code of Conduct, Company policy, or applicable law, unless the allegation made, or information provided is found to be intentionally false or not made or provided in good faith. To the maximum extent possible, we will maintain the confidentiality of all complaints. All allegations of retaliation will be investigated, and if appropriate, disciplinary action will be taken, up to and including termination.

9. Grievance Addressal

We have Code of Conduct that defines highest standards of business conduct for Fractal and its global subsidiaries in line with the company Value, Ethics, and People Principles.

Anyone who is aware of actions constituting issues of bias, partiality, and discrimination of any kind, abuse, victimization, or harassment including unfair employment practices is strongly encouraged to report the details as soon as possible. Fractal will take all reasonable measures to redress past discriminatory or harassing behaviour and prevent future discrimination and harassment if the organization is made aware of it. Anyone experiencing or anyone who becomes aware of actions constituting discrimination or harassment of any kind including unfair employment practices should immediately report the violation through the following channels:

- Contacting Business Leader or any Human Capital Representative
- Confidentially or anonymously reporting any potential instance of ethical misconduct or malpractice or non-compliance - at Ethics line ([Refer Link: How to Raise a Concern | Fractal](#))

All reports of violations of this policy will be taken seriously, and an investigation will be promptly conducted into each reported incident consistent with the procedures set forth in the Code of Conduct Policy. To ensure the investigation is thorough, anyone providing a report of suspected improper activity must provide as much detail, including dates, time, location, and names of individuals involved as is within their knowledge. All individuals who are called to provide information about an allegation are expected to fully cooperate, give complete and truthful responses, and answer questions with as much detail as is known. Any person who does not fully cooperate or who gives false or misleading information during an investigation may be subject to disciplinary action up to and including termination.

Fractal may, in its sole discretion, put reasonable interim measures in place pending the outcome of an investigation including placing an employee suspected of inappropriate conduct on unpaid leave or suspension of employment. In the event the employee is not found to have acted inappropriately, the time of the unpaid leave or suspension will be paid, and the employee will return to work. In the event the Employee is determined to have violated this policy, any leave or suspension will not be paid, except as required by applicable laws.

Upon the conclusion of an investigation, Fractal will take appropriate action to address and eliminate misconduct. If an investigation reveals that an employee has violated a policy or engaged in unacceptable conduct, that employee will be subject to appropriate disciplinary action, up to and including termination or any other appropriate corrective or legal action.

10. Policy Usage

The aim of the DEI Policy is to create a workplace which encourages and supports equity, fairness, and eliminates all forms of discrimination. At Fractal, we place extreme trust in one another and treat each other as we would like to be treated.

To support our DEI policy commitment, we intend to continuously enhance the capabilities of significant cohorts by:

- Providing ongoing sensitization training on unconscious biases for our talent acquisition team and hiring panel members.
- Developing a consistent understanding and practice of inclusive language.
- Empowering managers to foster an environment of open communication, diverse viewpoints, and collaboration within their teams.
- Educating leaders on effective strategies to address bias and discrimination within their teams and throughout the organization.
- Actively working towards incorporating mandatory DEI training into the onboarding plan

We intend to use diverse communication, both internally and externally, to foster engagement, enhance awareness, inspire active participation in DEI initiatives, promote allyship, and cultivate a strong sense of belonging within our organization and the broader community.

11. Definition and Acronyms

Definitions

Term	Explanation
Employee	Person hired to perform a job or service for Fractal, and one who is directly employed or hired on a contractual basis
Client	All the clients of the organization who avail services or products provided by the Fractal
Vendors	All third parties which includes, but is not limited to vendors, volunteers, contractors, consultants, temporaries, interns, and others who have access to, support, administer, manage, or maintain Fractal's information or physical assets

Acronyms

Acronym	Full Name
Fractal/Company	Fractal Analytics Inc.
HCBP	Human Capital Business Partner
Code	Code of Conduct
DEI	Diversity, Equity & Inclusion