

Equal Opportunity Policy for Persons with Disabilities

Applicability

This Equal Opportunity Policy shall be applicable to Greaves Cotton Limited, its subsidiary and its associate companies (hereinafter referred to as “Greaves”).

Preamble and Overview

At Greaves, we recognise the value of a diverse workforce. We are committed to providing equal opportunities in employment and creating an inclusive workplace and work culture in which all employees are treated with respect and dignity.

At Greaves, workforce diversity is a business imperative. We will strive to ensure that our workforce is representative of all sections of the society. We believe that, by doing so, we would be better equipped to develop and deliver accessible and inclusive products and services. In this way, we hope to be able to meet the needs of our clients and customers better thus producing business excellence. At Greaves, we will proactively work towards ensuring that at least 2% of our workforce is comprised of people with benchmark disability, which is a conservative estimate of their representation in the general population.

This Equal Opportunity Policy (“Policy”) is in accordance with the provisions of The Rights of Persons with Disabilities Act, 2016 (“the RPWD Act”). At Greaves, we commit to conform not just to the letter but also to the spirit of the RPWD Act.

To ensure seamless implementation of this Policy, Greaves has created a strategic plan and modified the related employee policies and processes. The plan has been devised on the basis of advice from relevant organisations as well as in consultation with appropriate employee representatives.

The Liaison Officer, Mr. Neetesh Priyaranjan, will be in charge for its implementation.

Policy Statement

Greaves is committed to eliminating all forms of unlawful discrimination (which includes direct discrimination, indirect discrimination and denial of reasonable accommodation), bullying and harassment of people with disabilities.

At Greaves, we continuously strive to ensure that all our facilities, technologies, information and privileges are accessible to people with disabilities.

We encourage candidates with different disabilities to apply. Our decisions on employment, career progression, training or any other benefits are solely based on merit. We follow an inclusive evaluation process by ensuring that a person with disability is provided with any suitable flexibility and accommodation that may be required so that she/he may be evaluated fairly. Any information shared by employee on disability/medical condition will remain confidential.

If an employee acquires a disability during her/his employment tenure she/he can return to work at the same rank as before. In case the employee is unable to perform the current job, the organisation will invest in re-skilling the employee for another position at the same rank or higher.

Greaves is committed to promoting awareness on equal opportunity and inclusion of people with disabilities among all employees by organising training and sensitisation programmes and campaigns.

Scope

The Policy covers all persons with disabilities. They could be job applicants, full time/part time employees, interns/trainees, contractual employees, including temporary employees. It also covers those employees who acquire disability during their work tenure.

The Policy applies to all aspects of employment, be it recruitment, training, working conditions, salaries, transfers, employee benefits and career advancement.

Definitions as per the RPWD Act

- ❖ “Person with disability” means 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.
- ❖ “Person with benchmark disability” means a person with not less than forty per cent of a specified disability where specified disability has not been defined in measurable terms and includes a person with disability where specified disability has been defined in measurable terms, as certified by the certifying authority.
- ❖ “Specified disabilities” are the disability categories mentioned in the Schedule of the RPWD Act.

The disability categories as mentioned in the Schedule are:

1. Physical disability

- A. Locomotor disability
 - Leprosy cured person
 - Cerebral Palsy
 - Dwarfism
 - Muscular Dystrophy
 - Acid attack victims
- B. Visual impairment:
 - Blindness
 - Low vision

- C. Hearing impairment:
 - Deaf
 - Hard of Hearing
- D. Speech and Language disability

2. Intellectual Disability

- A. Specific Learning Disability
- B. Autism Spectrum Disorder

3. Mental Behaviour

- Mental illness

4. Disability caused due to -

- A. Chronic Neurological Conditions
 - Multiple sclerosis
 - Parkinson's disease
- B. Blood disorder
 - Haemophilia
 - Thalassemia
 - Sickle Cell disease

5. Multiple Disabilities

6. Any other category (as may be notified by the Central Government)

- ❖ “High support” means an intensive support, physical, psychological and otherwise, which may be required by a person with benchmark disability for daily activities, to take independent and informed decision to access facilities and participating in all areas of life including education, employment, family and community life and treatment and therapy.
- ❖ “Discrimination” in relation to disability, means any distinction, exclusion, restriction on the basis of disability which is the purpose or effect of impairing or nullifying the recognition, enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field and includes all forms of discrimination and denial of reasonable accommodation.
- ❖ “Reasonable accommodation” means 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.

Policy Details

1. Facilities and amenities

a) Reasonable Accommodation

Greaves will make reasonable accommodations, whenever necessary, for qualified employees or job applicants who have disabilities, as per the RPWD Act. Such accommodation would be provided: 1) to ensure equal opportunity in the application and selection process, 2) to enable an employee with a disability to perform the essential functions of a job, and 3) to enable an employee with a disability to enjoy the same benefits and privileges of employment as non-disabled employees.

Examples of reasonable accommodations may include (but not limited to) acquiring or modifying equipment or devices, modifying assessment and training materials, modifying work schedules, reassignment to a vacant position.

All documents concerning an employee's reasonable accommodations request would be maintained in the employee's confidential file, separate from the employee's official personnel file.

2. List of positions identified

In Greaves, all positions are open for people with all types of disabilities. The hiring is purely based on merit and the candidates are evaluated based upon their skills and competence. Flexibility and accommodations will be provided to persons with disabilities on an individual basis as detailed in the subsequent section.

3. Manner of selection

a) Vacancy advertisement and application

- Wherever possible, all vacancies will be advertised internally and externally.
- Wherever possible, vacancies will be notified to colleges, polytechnics and disability organisations.
- All vacancy advertisements will include an appropriate short statement on equal opportunities for people with disabilities.
- Selection criteria (job description and employee specification) will be kept under constant review to ensure that they are non-discriminatory and that they relate purely to the skills needed for the job and nothing else.
- Application forms will be made available in alternate formats, based on request.

b) Selection Process

The selection process will be followed as per the RPWD Act.

4. Other facilities

a) Training and Career development

Greaves will endeavour to provide course materials meant for induction and training in accessible formats on request. The request for reasonable accommodation, such as assistive aids, accessible training venue, accessible materials, interpreter, scribe, etc. should be placed at least one week prior to the scheduled date of commencement of induction/training.

Greaves has an accessible and inclusive appraisal process. Any employee/Manager requiring any accommodations for an appraisal process must place a request with the Liaison Officer at least two days in advance.

b) Disability Leave

An employee's request for extra leave, for a reason related to her/his disability, will be treated as a request for reasonable accommodation and will be evaluated accordingly.

Greaves provides an option of unpaid special leave for a maximum period of three months for employees with disabilities who plan to undergo medical treatment. The procedure for availing the leave is detailed out in the company's Leave Policy.

c) Travel, stay and transport

For official travel (local, outstation and international), employees with disabilities will be provided accessible modes of transport. Air travel (in case road/train travel is inaccessible), accessible guest houses and hotels and allowing a personal attendant to travel along, will be provided, as per our reasonable accommodation guidelines.

d) Employee Engagement and social inclusion

Greaves will endeavour to make all company events and meetings inclusive by ensuring that these are conducted at accessible venues with a provision of reasonable accommodation being available to employees with disabilities.

Governance Framework

The Executive Director of the respective company is responsible for ensuring that the establishment operates in compliance with the RPWD Act and to fulfil the terms of this Policy. The HR Head takes a lead in implementing the programme and is responsible for planning, monitoring and reviewing the programme's progress to ensure compliance with the Policy.

1. Disability Leadership Council

Disability Leadership Council comprises of representatives of all business units/functions, two elected representatives from employees with disabilities, and one external member who

has extensive knowledge of disability issues.

The charter of the Disability Council is to:

- Collect periodic feedback from various stakeholders on disability barriers.
- Create an annual action plan based upon the feedback received.
- Allocate budget to implement the plan.
- Monitor the progress of the plan to ensure that the required targets are met.

The Council reports annually on the various equal opportunity activities undertaken.

2. Liaison Officer

As per the mandate of the RPWD Act, Greaves has appointed Mr. Neetesh Priyaranjan as a Liaison Officer who will be responsible for taking initiative and providing the requisite support needed to realise the goals of an inclusive and accessible workplace and reasonable accommodation.

The Liaison Officer is responsible for:

- Implementing the action plan for making the workplace and IT systems accessible for people with disabilities by liaising with the various departments in the organisation.
- Ensuring that all employees are aware of the Equal Opportunity Policy and knows their duties and rights in relation to the Equal Employment Opportunity policy.
- Developing proactive strategies to prevent discrimination and harassment.

The Liaison Officer will share the quarterly progress report with the HR Head.

All employees have the responsibility to comply with the Equal Opportunity Policy. Managers and team members need to monitor the work environment to ensure that it is free from discrimination and harassment and encourages inclusion and respect for others.

All employees are encouraged to report any incidents of violation of this policy and Managers should act promptly when concerns arise or complaints are made.

Maintenance of Records

Greaves will collect and maintain data regarding employees with disabilities in relation to their employment, facilities provided and other necessary information as per the RPWD Act. All employees will be asked to fill the Voluntary Disability Self Identification Form in order to give information regarding any disability that she/he may have. An employee can edit the information at any time during her/his tenure. There will be no penalties imposed because she/he did not share information regarding her/his disability earlier. An employee who acquires disability can also edit and update the form.

The information that an employee shares about her/his disability will be kept confidential. It will be maintained in a separate file and not in her/his personal file.

Exceptions to the confidentiality clause:

- 1) Managers/Supervisors may be given information about an employee's disability for allowing/providing any accommodations.
- 2) Security personnel may be given information about an employee's disability so as to facilitate obtaining any necessary support during an emergency.
- 3) Government officials who are investigating the compliance with the RPWD Act may be given information about an employee's disability.

Grievance Redressal

Employees with disability have the right to file a complaint concerning any discrimination with the Grievance Officer who then reports the same to the Compliance Review Board ("CRB"). The CRB shall take precedence over all such grievance redressal matters.

Mr. Neetesh Priyaranjan is appointed as the Grievance Officer. The Grievance Officer will maintain all records related to grievances.

The Grievance Officer and the CRB will follow the procedure of Grievance redressal as outlined in the RPWD Act.

On investigation, if the employee against whom the complaint has been made is found guilty of discriminatory behaviour, she/he will be subjected to disciplinary actions. Possible action taken against the employee may include a reprimand, detraction of benefits for a definite or indefinite time period, demotion, denial of promotion and suspension or termination for more serious offences. Involuntary or indirect discrimination will be resolved through training, counselling and suitable modification of procedures when required to ensure fair treatment.

Affirmative Action

Greaves, for the purpose of promoting equality of opportunity, seeks to increase the representation of people with disabilities using suitable recruitment and outreach efforts. These include, but is not limited to:

- 1) Participation in job fairs, training and scholarship programmes and organising special recruitment drives and training and employment of people with disabilities who have high support needs.
- 2) All training programmes conducted for people from lower socio-economic backgrounds will be inclusive.

Review of the Policy

The Policy will be reviewed basis changes in the applicable legislation and market guidelines.