

# **Equal Opportunity Policy for Persons with Disabilities** **of Jyothy Labs Limited**

## **Preamble and Overview**

At Jyothy Labs Limited (the Company), we recognise the value of a diverse workforce. The Company is committed towards providing equal opportunities in employment and creating an inclusive workplace and work culture in which all employees are treated with respect and dignity.

At Jyothy Labs Limited, workforce diversity is a business imperative. The Company strives to ensure that its workforce is representative of all sections of the society. The Company believes that, by doing so, it would be better equipped to develop and deliver accessible and inclusive products and services. In this way, the Company hopes to be able to meet the needs of its clients and customers better thus producing business excellence. The Company will proactively work towards ensuring that at least 1% of its workforce is comprised of people with benchmark disability, which is a conservative estimate of their representation in the general population.

This Equal Opportunity Policy is in accordance with the provisions of the Rights of Persons with Disabilities Act, 2016 (the Act). The Company commits to conform not just to the letter but also to the spirit of the Act.

The Human Resource (HR) department has the overall responsibility for the effective operation of this Policy and HR Head will be in charge for its implementation.

## **Policy Statement**

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

The Company continuously strives to ensure that all its facilities, technologies, information and privileges are accessible to people with disabilities.

The Company also encourages candidates with different disabilities to apply for the open position(s) in the Organization. The Company's decisions on employment, career progression, training or any other benefits are solely based on merit. The Company follows an inclusive evaluation process by ensuring that a person with disability is provided with some suitable flexibility and accommodation that may be required so that he/she may be evaluated fairly. The Company ensures that any information shared by an employee on disability/medical condition will remain confidential.

If an employee acquires a disability during his/her employment tenure he/she can return to work at the

same rank as before. In case the employee is unable to perform the current job, the organization will invest in re-skilling the employee for another position at the same rank or higher.

## Scope

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

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

## Definitions as per the Act

- ❖ **“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.
- ❖ **“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.
- ❖ **“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. (for the categories of disabilities refer the Act).
- ❖ **“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) Physical Infrastructure

The Company aims to ensure that its physical infrastructure (buildings, furniture, facilities and services in the building/campus and transportation) adheres to the accessibility standards as prescribed by the Government of India. Any new facility that is built or renovated or leased or rented

will be evaluated for compliance with accessibility standards at different stages of the building construction. Any employee facing accessibility issues should report to the HR Department, who in turn will co-ordinate with the Factory Manager/ Admin Department/ Person responsible at the respective location and get the issue resolved within stipulated time.

## **b) Digital Infrastructure**

It is Company's continuous endeavour to ensure that all its documents, communication and information technology systems adhere to the accessibility standards. The Company will ensure that only accessible technologies are procured. Any employee facing accessibility challenges can reach out to the local IT support team.

## **c) Reasonable Accommodation**

The Company will make reasonable accommodations, whenever necessary, for qualified employees or job applicants who have disabilities, as per the 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 Jyothy Labs, 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 portion.

## **3. Manner of selection**

- ❖ The process for appointment of all employees shall be in such manner as may be prescribed in the HR Policy of the Company.
- ❖ The Company's HR Department shall strive that they mention an appropriate short statement on Equal Opportunities for People with Disabilities, while posting any job vacancy/ opening advertisements.
- ❖ 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 by Person with Disability.
- ❖ The ground for rejecting any Candidate must be objective and not related to the Candidate's

disability.

- ❖ The HR Department shall be provided appropriate training on the topic of Equal Opportunities for Persons with Disabilities and shall adhere to it.

#### **4. Other facilities**

##### **a) Training and Career development**

The Company will endeavour to provide course materials meant for induction and training in accessible formats on request by an employee with Disability. 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.

##### **b) Disability Leave**

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

##### **c) Travel, stay and transport**

For official travel, employees with disabilities will be provided accessible modes of transport and guest houses/hotels. An employee can place a written/email request for this with the HR Department.

##### **d) Employee Engagement and social inclusion**

The Company will endeavour to make all its 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 HR Department is responsible for ensuring that the establishment operates in compliance with The 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. Liaison Officer**

As per the mandate of the Act, HR-Head will be the 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 progress report on timely basis with the Managing Director/ Board of Director.

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**

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

The information that an employee shares about his/her disability will be kept confidential. It will be maintained in a separate file and not in his/her 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 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 HR Department who will then take corrective actions and if required, involve the HR-Head for resolving the complaint. Any policy violation i.e. when any person with disability is discriminated against or not provided reasonable accommodation or denied access to any Company facility, will be regarded as a grievance.

On investigation, if the employee against whom the complaint has been made is found guilty of discriminatory behaviour, he/she will be subjected to disciplinary actions. Possible action taken against the employee may include a reprimand, deduction of benefits for a definite or indefinite time period, demotion, denial of promotion and suspension or termination for more serious offences, as the HR-Head in consultation with the Head of the Department of the guilty employee, may decide. Involuntary or

indirect discrimination will be resolved through training, counselling and suitable modification of procedures when required to ensure fair treatment.

### **Affirmative Action**

The Company for the purpose of promoting equality of opportunity, seeks to increase the representation of people with disabilities using suitable recruitment and outreach efforts. These may 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.
- 3) A certain percentage of the CSR budget will be allocated for supporting disability programme.

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This Equal Opportunity Policy for Persons with Disabilities has received assent of the Board of Directors of the Company on March 28, 2022 and will be applicable with immediate effect.