



EQUAL EMPLOYMENT OPPORTUNITY POLICY FOR PERSONS WITH DISABILITIES

OVERVIEW:

At Madhur Industries Limited ('MADHUR' or 'we'), we value the contribution of a diverse workforce. We are committed to providing equal opportunities in employment and fostering an inclusive workplace where all employees are treated with equal respect and dignity.

At MADHUR, workforce diversity is a business imperative and advancing diversity is one of our key focus areas. We will strive to ensure that our workforce is representative of all sections of the society. With a more diverse and inclusive workforce, 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.

This Equal Opportunity Policy is in accordance with the provisions of The Rights of Persons with Disabilities Act, 2016 ('The RPWD Act' or 'the Act') and The Central Government Rules, 2017.

POLICY STATEMENT:

Madhur Industries Limited is committed to eliminating all forms of unlawful discrimination - which includes direct or indirect discrimination and denial of reasonable accommodation, bullying and harassment of employees with disabilities.

We strive to ensure that all our facilities, technologies, information and privileges are accessible to employees 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.

MADHUR is committed to promoting awareness on equal opportunity and inclusion of people with disabilities among all employees by organizing training and sensitization programmes and campaigns.



SCOPE:

Policy covers all employees with disabilities in MADHUR. They could be job applicants, fulltime/ 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, including 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 her/his full and effective participation in society equally with others.
- 'Person with benchmark disability' means a person with not less than forty percent of a specified disability where specified disability has not been defined in measurable terms. It also includes a person with disability where specified disability has been defined in measurable terms by a certifying authority.
- 'Specified disabilities' are the disability categories the Schedule of the RPWD Act. There is also 'any other category', which allows the Central Government to add any other disability by issuing a notification.
- The disability categories as mentioned in the Schedule are:
 - o Locomotor Disability
 - o Muscular Dystrophy
 - o Leprosy cured
 - o Dwarfism
 - o Cerebral Palsy
 - o Acid attack Victim
 - o Low vision
 - o Blindness
 - o Deafness
 - o Hard of Hearing
 - o Speech and Language disability
 - o Intellectual Disability
 - o Specific Learning Disability
 - o Autism Spectrum Disorder
 - o Mental illness



- o Chronic Neurological Conditions
- o Multiple Sclerosis
- o Parkinson's Disease
- o Haemophilia
- o Thalassemia
- o Sickle Cell disease
- o Multiple Disabilities
- o Any other category (as may be notified by the Central Government from time to time)
- '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 persons with disabilities enjoy or exercise equal rights as others.

POLICY DETAILS:

FACILITIES AND AMENITIES:

PHYSICAL INFRASTRUCTURE:

MADHUR will ensure that suitable facilities and infrastructure are provided to employees with disabilities to enable them to effectively discharge their duties in the establishment. MADHUR aims to ensure that our physical infrastructure (buildings, furniture, facilities and services in the building/campus) adheres to the accessibility standards given in the Harmonized Guidelines and Space Standards for Barrier Free Built Environment for Persons with Disabilities and Elderly Persons, 2016 and the National Building Code, 2016 (collectively referred to as 'Standards').

Any new facility that is built, renovated, 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 facilities team at their location or write to their respective functional Head or HR Head.



DIGITAL INFRASTRUCTURE:

MADHUR continuous to ensure that all our documents, communication and information technology systems adhere to the accessibility standards. The Standards for Information and Communication Technology that will be followed are:

- o Website/application standards: Web Content Accessibility Guidelines (WCAG 2.1)
- o Documents Standards: Accessible Word Document and Optical Character Reader (OCR) based PDF formats and EPUB Format

We will ensure that only accessible technologies are procured. Any employee facing accessibility challenges can reach out to the IT Head.

REASONABLE ACCOMMODATION:

MADHUR 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:

- o to ensure equal opportunity in the application and selection process,
- o to enable an employee with a disability to perform the essential functions of a job, and
- o to enable an employee with a disability to enjoy the same benefits and privileges of employment as non-disabled employees.

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 organization will invest in re-skilling the employee for another position at the same rank or higher.

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.

LIST OF POSITIONS IDENTIFIED:

At MADHUR, all positions are open to people with all types of disabilities. The hiring is purely based on merit and candidates are evaluated based on their skills and competence.

MANNER OF SELECTION:

o Selection Process

The selection process is the same for all candidates, including persons with disability. Flexibility and accommodations will be provided to job applicants with disabilities as required. Job applicants who need specific adjustment/accommodation in the selection process can contact the HR representative.

GOVERNANCE:

MADHUR has constituted a high-level Committee to promote and strengthen the company's charter to create an inclusive workplace for employees with disabilities.

The Committee will be chaired by the HR Head, and the members of the Committee will include Functional Heads, from relevant support functions along with Business Heads.

The objectives and the functions of the Committee are:

- o To ensure compliance with the applicable provisions mandated for private establishments under The RPWD Act.
- o To plan and allocate budget for driving the persons with disability charter efficiently.
- o To oversee the effective implementation of the company's equal opportunity policy.

LIAISON OFFICER:

MADHUR has appointed the HR Head for persons with disabilities to be the Liaison Officer, as per the mandate of the Central Rules under the RPWD Act. The HR Head will coordinate with the various concerned departments and provide subject matter expertise to implement the plan. The HR Manager will also be responsible for ensuring that employees and job applicants with disabilities receive the needed reasonable accommodation for performing their job and participating in the selection process on an equal basis with others. She/he will also raise awareness among all employees in the company to create an inclusive work environment. She/he will present a progress report to the Committee every year.

HR MANAGERS:

Human Resource managers have the functional responsibility for ensuring compliance with the provisions of this policy. They should proactively take steps to ensure that all employees are sensitized and there is no discrimination in recruitment, training, career development and other aspects of employment.

MAINTENANCE OF RECORDS:

MADHUR has a robust and well-defined process for capturing and maintaining the records of its employees. MADHUR understands and respects that sharing information about one's disability is purely a personal preference, and nobody is mandated to do so.

Employees who have a disability or medical condition and wish to share the information can fill the Voluntary Self-Identification to disclose their disability and submit it to the HR Manager. Also, given that disability or medical ailment can be acquired at any point, an employee can edit and/or update the information in the form anytime.

Employees who are citizens of India can upload the disability certificate issued by Government of India, which would help them avail Government benefits like income tax exemptions.

GRIEVANCE REDRESSAL:

MADHUR has a well-defined grievance redressal mechanism in place to enable its employees and others associated with the company to not overlook any concern but instead raise it at early stage in the right manner, without fear of retaliation, victimization, subsequent discrimination or disadvantage at the workplace. MADHUR does not tolerate any malpractice, impropriety, abuse or wrongdoing or discrimination or harassment and encourages its employees to raise their concerns.

The organization ensures that such concerns would be thoroughly inquired by the designated persons independently and fairly. While the company considers the malpractices or wrongdoing or abuse or harassments in general, it is also conscious of the likelihood of any direct or indirect discrimination or denial of reasonable accommodation or bullying behaviour towards employees with disability and would treat such instances also, as malpractice, abuse or harassment, as the case may be.

The organization will follow the same procedure for inquiring and investigating the complaints or concerns raised by employees with disability. However, necessary reasonable accommodation will be provided to employees with disabilities to effectively participate in the investigation process. For example, sign language interpreter for persons with deafness, accessible venue for persons with locomotor disability, etc.

Employees can reach out to their HR manager to voice concerns. In case the issue is still not resolved, they can raise an Ombuds per the internal vigil mechanism or the MADHUR Whistle-blower policy.



If an employee raises a concern, she/he will not be under any risk in the form of retribution or retaliation. The company will not tolerate any harassment or victimization (informal pressures) against any employees raising concerns who have a genuine case and will take appropriate action accordingly.