

EQUAL OPPORTUNITY POLICY

This policy applies to all Kesoram Industries Limited (“**Company**”) employees (“**employees**”) and operations. The Company aims to create employment opportunities such that all employees achieve their full potential.

I. Policy purpose

1. It is the policy of Kesoram Industries Limited to provide equal employment opportunities, without discriminating on the grounds of age, color, race, gender identity, national or ethnic origins, religious belief, disability, marital status, nationality, race, religion, sex or sexual orientation. The Company strives to maintain a work environment that is free from any harassment based on the above considerations. This equal employment opportunity policy (“**Equal Opportunity Policy**”) is subject to provisions of the Rights of Persons with Disabilities Act, 2016, read with the Rights of Persons with Disabilities Rules, 2017 (collectively “**Disability Act**”).
2. This Equal Opportunity Policy is consistently applied throughout the period of employment of the individual, right from the recruitment process till superannuation.
3. While the Company encourages candidates with different disabilities to apply for employment, promotions etc., with the Company, the Company’s decisions on employment, career progression, training or any other benefits are solely based on merit and qualifications of the individual.
4. This Equal Opportunity Policy outlines the options available to employees with disabilities in seeking support or adjustments in connection with their employment.
5. While this policy addresses some of the specific operational aspects for employees and aims to provide a guide for managers and employees, this Equal Opportunity Policy should be read harmoniously with any other relevant policies of the Company on equality and non-discrimination at the workplace

II. Meaning of Disability

1. The Disability Act uses a wide definition of ‘person with disability’ which includes those with physical or mobility impairments, visual impairments, hearing impairments, intellectual disability, mental health difficulties, and autistic spectrum conditions. The formal definition of a ‘person with disability’ included in the Disability Act is:

“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”

2. The Company will endeavor to ensure that even individuals who are not explicitly covered by the definition of a ‘person with disability’ are, to the extent possible, provided the necessary facilities to ensure that they are not in any way unreasonably disadvantaged to other employees, in relation to their employment with the Company.

III. Equal Opportunity for Persons with Disabilities

1. In accordance with the provisions of the Disability Act, it is the Company's policy to ensure that the work environment is free from any discrimination against persons with disabilities. Further, the Company will take all actions to ensure that a conducive environment is provided to persons with disabilities to perform their role and excel in the same. The Company will build systems and processes to ensure:
 - (a) That appropriate facilities and amenities are provided to persons with disabilities to enable them to effectively discharge their duties in the workplace;
 - (b) That provision is made for a barrier-free accessible environment and for availability of assistive devices, as and when required;
 - (c) That the Human Resources Department of the Company will ensure a liaison officer is designated to oversee the provision of required facilities/amenities, including the process of recruitment for persons with disabilities. Such liaison officer shall be part of the Human Resources team. Towards this end, the Company has designated P. Radhakrishnan, Whole-time Director & CEO as the liaison officer, who may be contacted at p.radhakrishnan@kesoram.com for any of the aforementioned purposes;
 - (d) That a grievance redressal mechanism for addressing the matters related to the employment of persons with disabilities is available; and
 - (e) That no opportunity is denied to persons with disabilities on ground of disability.
2. The Company monitors self-declaration of disability at the application as well as appointment stage and during the term of employment. The Company may at any time require an employee to provide proof of disability, including obtaining the necessary certification under the Disability Act and other applicable laws.
3. All positions at the Company are open to people with disabilities, and the hiring and recruitment processes are purely based on the merits and qualifications of the candidate. In the event the Company finds a candidate suitable for such roles then it would, where reasonably possible, recruit persons with disability for such roles.
4. Managers who conduct the annual review of their staff will pay attention to the developmental needs of disabled employees together with discussing any reasonable adjustments which may be identified.

IV. Reasonable Adjustments

1. The Company will make reasonable adjustments when a disabled employee may be placed at a substantial disadvantage in comparison with a person who is not disabled, such as making appropriate arrangements in relation to the workplace, training, business trips, office events etc. This may include making adjustments in the nature of reallocation of duties, altering working hours, changing work location, modifying equipment (e.g. providing an adaptive keyboard or telephone), consideration of other roles, provision of additional support to carry out official duties, adjustments to assessment practices and seating arrangements.
2. The Company will make reasonable adjustments at its discretion and on a case-to-case basis. No actions of the Company in this regard, will be considered a precedent for any future requests from any employee with disabilities and the same cannot be claimed as a right.

3. All training and sessions to be attended by employees are normally held in accessible venues with consideration of the needs of employees with disabilities, including providing handouts with larger prints or which are differently coloured for those with visual impairments. All employees are required, at the time of their joining, and subsequently on a periodic basis, to provide details on whether they have any access requirements, reasonable adjustments or requirements that need to be accommodated in connection with their employment with the Company. Employees with disabilities will be provided, whenever deemed necessary by the Company, post-recruitment and pre-promotion training.
4. **Special leave:** Upon exhausting regular leave benefits, employees with disability may request for extra leave on account of their disability, subject to providing adequate evidence in this regard and the Company will evaluate such request accordingly. An employee's request for such extra special leave will be treated as a request for reasonable accommodation and will be evaluated accordingly on a case to case basis. The special leave entitlement in this regard will not exceed 5 (five) days of leave per year.

V. Access to Work

1. The Company will make every effort to ensure that all parts of the Company's workplaces are accessible to persons with disabilities. The Company will use its best efforts to make appropriate official programs, training and events reasonably accessible to individuals with disabilities. Some of the specific measures that the Company has endeavored to put in place, and will continue to do so going forward, are:
 - (a) Ensure that adequate and well-illuminated spaces, with access to elevators, where relevant, are allocated to persons using mobility devices such as wheelchairs, walkers etc. as well as those walking with the assistance of other persons;
 - (b) Ensure that signage within the workplace is visible and legible to all employees, including providing braille and audio signs wherever possible;
 - (c) Provide conveniently located unisex washrooms that are accessible to persons with disabilities;
 - (d) Ensure that the only way to move between levels is not by way of stairs, and that persons with disabilities have access to ramps, elevators etc.
 - (e) Provide resting facilities within the workplace, especially in parts where the persons with disabilities are required to cover large distances;
 - (f) Make waiting areas, canteens and other facilities accessible to persons with disabilities;
 - (g) Provide clearly demarcated reserved parking to persons with disabilities at a convenient distance from the workplace building;
 - (h) Install handrails wherever necessary;
 - (i) Ensure that drinking water units/fountains are accessible to employees with disabilities; and
 - (j) Put in place a system for evacuation of all employees, including persons with disabilities, in case of an emergency (e.g. fire).
2. The Company shall not compel any person with disability to partly or fully pay the costs which it incurred for providing any reasonable adjustment made by the Company in relation to employees with disability.
3. To the extent possible and relevant, the Company will extend these measures to visitors as well, especially if the Company has been provided with prior notice of the visit.

4. The Company is also committed to taking reasonable measures to support the accessibility of its digital resources such as digital hardware, software, and systems for use by employees, including its website, and its internal platform/server. Any individual who seeks an adjustment based on a disability regarding access to digital resources should contact [].
5. The Company will, upon receiving a request in this regard, at its discretion and on a case-to-case basis, consider such employees' request with respect to transfer, posting, allotment of residential accommodation (if relevant) and any other facilities. No actions of the Company in this regard, will be considered a precedent for any future requests for special consideration from any employee with disabilities, and this cannot be claimed as a right.

VI. Harassment and Other Forms of Discrimination

1. Apart from anti-harassment policies that are generally applicable to all employees, the Company strives to specifically eliminate harassment of persons with disabilities that is related to their disabilities or to the disabilities of others associated with them. Harassment may take the form of verbal abuse or other actions which make an individual feel uncomfortable, intimidated or degraded.
2. If any individual has been a victim of, or witness to, any such harassment in connection to their employment with the Company, they are urged to come forward and report the same to P. Radhakrishnan, Whole-time Director & CEO at p.radhakrishnan@kesoram.com.

VII. Responsibility

1. Every member of the management of Company is responsible for giving effect to this policy.
2. Each establishment of the Company at various locations is responsible for obtaining and utilizing up-to-date information regarding applicable state and local laws and regulations in relation to rights of persons with disabilities.
3. The Human Resources Managers have the functional responsibility of assuring compliance with Company policies, including this Equal Opportunity Policy; developing, coordinating and implementing all programs; and reporting findings and progress.

VIII. Confidentiality and Non-retaliation

1. Individuals with disabilities who apply or employees who believe themselves to be covered by the Disability Act, should contact the Human Resources Representative in any given location. Any information obtained is voluntary, and will be kept confidential, and treated with respect in accordance with applicable data-protection laws and relevant policies of the Company.
2. Refusal to provide information will not subject an employee or applicant to any disciplinary action only on such ground. However, such refusal may disentitle the employee/ applicant to rights and benefits under this Equal Opportunity Policy.
3. Employees and applicants will be protected from coercion, intimidation, interference, discrimination or retaliation for filing a complaint or assisting in an investigation under the Disability Act.

IX. Communication of Policy

1. This Policy will be available to all employees via the website of the Company and normal communication channels within the Company.
2. Suitable material in relation to this Equal Opportunity Policy will be included in Company publications, management conferences, and supervisory training courses.
3. All recruitment literature and employment advertising will indicate that the Company is an Equal Opportunity Employer.
4. Employees can contact p.radhakrishnan@kesoram.com, if they require any information or clarification in relation to this Equal Opportunity Policy.

X. Limitation and Amendment:

In the event of any conflict between the provisions of this Policy and of the Act or Listing Agreement or any other statutory enactments, rules, the provisions of such Act or Listing Agreement or statutory enactments, rules shall prevail over this Policy. Any subsequent amendment / modification in the Listing Agreement, Act and/or applicable laws in this regard shall automatically apply to this Policy.