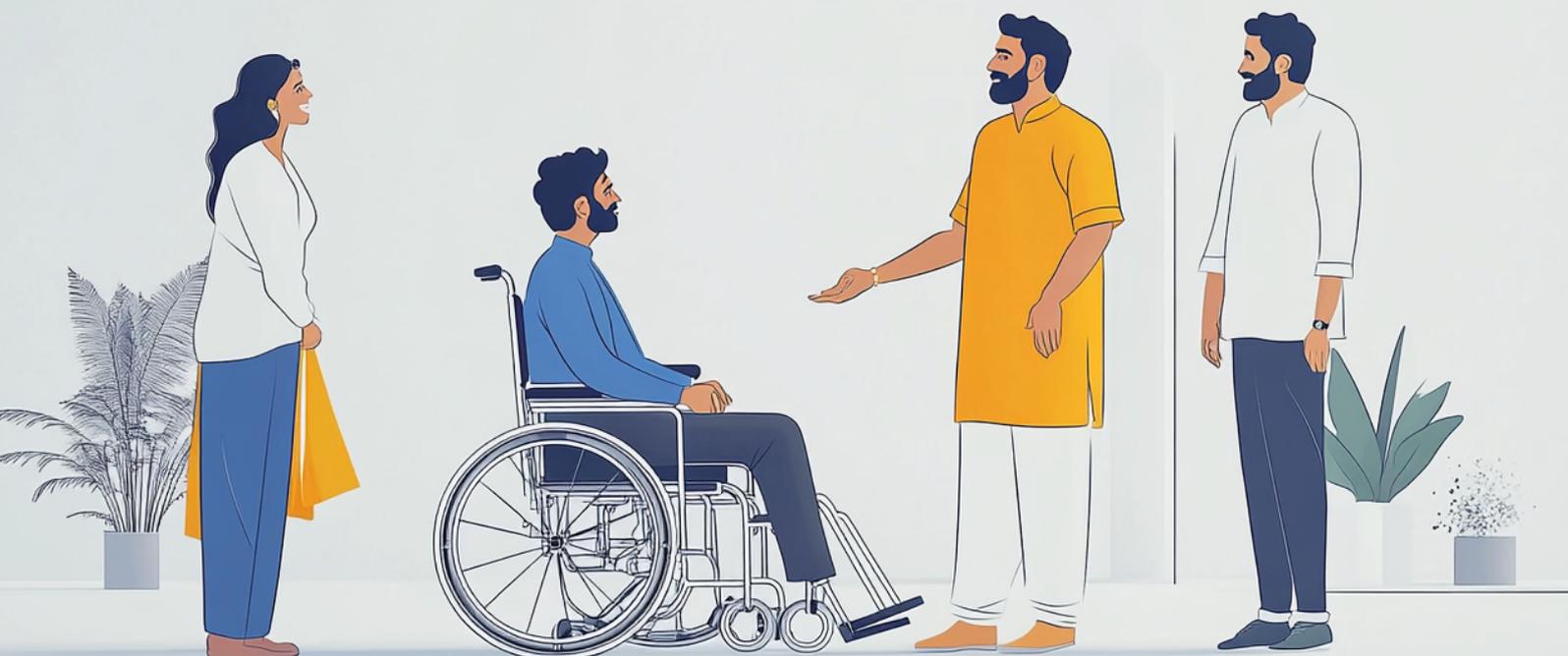




# Document

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## Equal Opportunity & Positive Inclusion Policy for Persons with Disabilities



## **Introduction**

At Kimbal Private Limited, we are dedicated to fostering a workplace that celebrates diversity and inclusivity. Our work ethos is egalitarian and we are convinced that together we stand tall. We believe that every individual, regardless of their disability, deserves equal opportunity and fair treatment. This policy outlines our commitment to creating an accessible and supportive environment for persons with disabilities, promoting their inclusion, and ensuring their rights are protected.

By fostering an inclusive environment, we aim to harness the unique perspectives and talents of individuals with disabilities, driving innovation and achieving our business goals. We invite and persuade all employees to embrace this policy, support their colleagues, and contribute to a truly inclusive workplace culture. Kimbal Private Limited will continuously strive to improve our practices and ensure equal opportunities for all individuals with disabilities. Together, we can build a diverse and inclusive workplace that inspires excellence and respects the rights and dignity of every individual.

## **Scope**

This policy applies to all employees, job applicants, interns, and contractors with disabilities at Kimbal Private Limited. It encompasses all aspects of employment, including recruitment, hiring, training, job assignments, promotions, compensation, and benefits. Kimbal Private Limited is committed to engaging with relevant stakeholders, including disability organizations and experts, to enhance our understanding and implementation of inclusive practices.

# Background

This Equal Opportunity Policy aligns with the regulations outlined in the Rights of Persons with Disabilities Act, 2016 (“the Act”). The Company pledges its commitment to not only comply with the requirements of the Act but also embrace its underlying principles and values.

## 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 a list of the categories of disabilities, refer to 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

- **Non-Discrimination:** Kimbal Private Limited strictly prohibits any form of discrimination against persons with disabilities. We promote a culture of respect and dignity where all employees are treated fairly and equally, irrespective of their disability status. Discrimination includes any distinction, exclusion, or restriction that impairs or nullifies the recognition, enjoyment, or exercise of equal human rights and freedoms.
- **Accessibility:** We strive to make our physical and digital workplace accessible to all. Kimbal Private Limited is committed to providing reasonable accommodations and ensuring that individuals with disabilities can access facilities, technologies, information, and opportunities on an equal basis. We will aim to adhere to accessibility standards and guidelines as prescribed by the government to create an inclusive environment.
  - **Physical Infrastructure:** Kimbal Private Limited will regularly assess and enhance the accessibility of its physical infrastructure, including buildings, workspaces, common areas, and transportation. Any accessibility issues should be reported to the HR Department, who will coordinate with the relevant departments to address and resolve them promptly
  - **Digital Infrastructure:** It is our Company's endeavour to ensure compliance of our digital platforms, documents, and information technology systems with accessibility standards. We will aim to ensure that technologies procured are accessible, and all our employees facing accessibility challenges can seek assistance from the local IT support team.
  - **Reasonable Accommodation:** Kimbal Private Limited will provide reasonable accommodations to qualified employees or job applicants with disabilities, as per the provisions of the Act. These accommodations aim to ensure equal opportunity in the application and selection process, enable employees with disabilities to perform essential job functions, and allow them to enjoy the same benefits and privileges as non-disabled employees. Examples of reasonable accommodations may include, but will not be limited to equipment modifications, modified work schedules, and job reassignments.

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- **Recruitment and Employment:** Kimbal Private Limited welcomes applications from individuals with disabilities and endeavours to provide them with equal employment opportunities. Our recruitment processes are designed to be inclusive and fair, focusing on skills, qualifications, and competencies. We will make reasonable accommodations during the recruitment process to ensure equal participation and access. Decisions on employment, career progression, training, and benefits will be based solely on merit, without any discrimination based on disability.
- **Job Postings:** When advertising job vacancies, Kimbal Private Limited will include an appropriate statement on equal opportunities for persons with disabilities to encourage their participation.
- **Selection Criteria:** We will regularly review and update our selection criteria to ensure they are non-discriminatory and directly related to job requirements. The HR Department will receive training on equal opportunities for persons with disabilities and will adhere to fair and inclusive evaluation processes.
- **Application Accessibility:** Application forms will be made available in alternate formats upon request by persons with disabilities.
- **Reasonable Adjustments:** Kimbal Private Limited will provide reasonable adjustments and accommodations during interviews, assessments, and other selection procedures to ensure equal participation for individuals with disabilities.
- **Career Development and Advancement:** We are committed to offering equal opportunities for career development and advancement to all employees, including those with disabilities. Kimbal Private Limited will provide appropriate training, mentoring, and support to enhance the professional growth of individuals with disabilities. We will ensure that training materials and programs are accessible to all employees, including those with disabilities, upon request.
- **Reasonable Accommodation in the Workplace:** Kimbal Private Limited will make reasonable accommodations to enable employees with disabilities to perform their job responsibilities effectively. Accommodations may include modifications to workspaces, flexible work arrangements, assistive technologies, or any other necessary adjustments based on the individual's needs. Employees are encouraged to contact the HR Department to discuss their accommodation requirements confidentially. Kimbal Private Limited will engage in an interactive process with the employees to identify and implement reasonable accommodations promptly.

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- **Confidentiality and Privacy:** Any information shared by an employee regarding their disability or medical condition will be treated with the utmost confidentiality. Disclosure of disability is voluntary, and employees can choose to disclose their disability to the HR Department or their supervisor if they require accommodations or support. Such information will only be shared with individuals on a need-to-know basis, in compliance with relevant privacy laws and regulations.
- **Awareness and Sensitisation:** Kimbal Private Limited is committed to raising awareness and fostering a culture of inclusivity. We will provide training and sensitisation programs to employees to promote understanding, empathy, and encourage respectful interactions with colleagues with disabilities. These programs will cover disability etiquette, accessibility awareness, and creating an inclusive work environment.
  - **Training for Managers and Supervisors:** Managers and supervisors will receive additional training on managing and supporting employees with disabilities, including addressing accommodation requests, fostering inclusivity, and preventing discrimination.
  - **Employee Awareness:** Regular awareness campaigns and workshops will be conducted to educate employees about various disabilities, common challenges faced by individuals with disabilities, and the importance of creating an inclusive workplace.
- **Review and Continuous Improvement:** This policy will be periodically reviewed to ensure its effectiveness and compliance with relevant laws and regulations. Feedback from employees will be actively sought and incorporated to improve our efforts in promoting inclusivity and equal opportunities. We will establish mechanisms for employees to provide feedback, suggestions, or file complaints regarding disability-related matters without fear of retaliation.
- **Reasonable Accommodation in the Workplace:** Kimbal Private Limited will make reasonable accommodations to enable employees with disabilities to perform their job responsibilities effectively. Accommodations may include modifications to workspaces, flexible work arrangements, assistive technologies, or any other necessary adjustments based on the individual's needs. Employees are encouraged to contact the HR Department to discuss their accommodation requirements confidentially. Kimbal Private Limited will engage in an interactive process with the employees to identify and implement reasonable accommodations promptly.

# Governance

In order to ensure compliance with the Act and uphold the principles outlined in this policy, the HR Department bears the responsibility of overseeing the organisations operations. The HR Head assumes a leadership role in implementing the program and is accountable for planning, monitoring, and evaluating its progress to ensure adherence to the policy.

## Liaison Officer

As stipulated by the Act, the HR Head serves as the designated Liaison Officer, to take proactive measures and provide necessary support to foster an inclusive and accessible workplace, including reasonable accommodations. The Liaison Officer's duties encompass:

- a. Collaborating with various departments within the organization to implement the action plan for enhancing accessibility of the workplace and IT systems for individuals with disabilities.
- b. Ensuring that all employees are well-informed about the Equal Opportunity Policy, including their rights and responsibilities regarding equal employment opportunities.
- c. Developing proactive strategies to prevent discrimination and harassment.
- d. Regularly reporting progress to the Managing Director/Board of Directors.

All employees are obliged to comply with the Equal Opportunity Policy. Managers and team members hold the additional responsibility of monitoring the work environment to ensure it remains free from discrimination and harassment, fostering inclusion and respect for all individuals. Employees are encouraged to report any incidents of policy violations, and managers are expected to promptly address raised concerns or complaints.

## Maintenance of Records

The Company will gather and maintain data pertaining to employees with disabilities, encompassing employment-related information, provided facilities, and other relevant details as required by the Act. All employees will be requested to complete a Voluntary Disability Self Identification Form, providing disclosure of any disabilities they may have. Employees have the flexibility to update the information throughout their tenure, and no penalties will be imposed for not disclosing disabilities earlier. In the event an employee acquires a disability, they can also make the necessary updates to the form. Any information shared by an employee concerning their disability will be treated as confidential. It will be kept separately from their personal records in a dedicated file.

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## **Exceptions to the confidentiality clause include**

1. Managers/Supervisors may be provided with information about an employee's disability to facilitate necessary accommodations.
2. Security personnel may be informed about an employee's disability to provide support during emergencies.
3. Government officials conducting investigations regarding compliance with the Act may be granted access to information about an employee's disability

## **Grievance Redressal**

Employees with disabilities have the right to file complaints regarding discrimination with the HR Department. The HR Department will take corrective actions and involve the HR Head, if necessary, to resolve the complaint. Any violation of the policy, such as discrimination, failure to provide reasonable accommodations, or denial of access to Company facilities, will be treated as a grievance. Following an investigation, if the accused employee is found guilty of discriminatory behaviour, disciplinary actions will be taken. These actions may include reprimand, temporary or permanent loss of benefits, demotion, denial of promotion, and, for more severe offences, suspension or termination. The HR Head, in consultation with the concerned head of department to which the guilty employee belongs, will determine the appropriate course of action. Instances of involuntary or indirect discrimination will be addressed through training, counselling, and necessary modifications to procedures to ensure fair treatment.

## **Affirmative Action**

In order to promote fairness and equal chances, the Company aims to increase the presence of people with disabilities by implementing appropriate recruitment strategies and outreach initiatives. These initiatives may involve various activities such as participating in job fairs, training and scholarship programs, and organising special recruitment campaigns specifically targeting individuals with disabilities, including those with significant support requirements. The Company also commits to ensuring inclusivity in all training programs for individuals from disadvantaged socio-economic backgrounds. Additionally, a portion of the CSR budget, as applicable, will be dedicated to supporting programs related to disabilities.