



Policy on Equal Opportunity & Anti-Discrimination

Covers the following Acts:

- ✓ The Rights of Persons with Disabilities (RPwD) Act, 2016
- ✓ The Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Act, 2017
- ✓ The Transgender Persons (Protection of Rights) Act, 2019

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Issued by

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CHRO



Policy on Equal Opportunity & Anti-Discrimination

1.0 Preamble & Overview

- 1.1** At Tata Projects Ltd (TPL), we recognize the value of a diverse workforce. We are committed to offering equal opportunities for employment and creating an inclusive workplace and culture in which all employees are treated with respect and dignity. At Tata Projects Ltd, workforce diversity is a business imperative. We will strive to ensure that our workforce is representative of all sections of society.
- 1.2** This policy is in accordance with the provisions of The Rights of Persons with Disabilities Act 2016 (herewith 'RPwD Act'), Transgender Persons (Protection of Rights) Act 2019, and Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Act 2017 (herewith 'HIV/AIDS Act').
- 1.3** To ensure seamless implementation of this policy, TPL strives to ensure that appropriate measures are taken in accordance with the policy. MD & CHRO have the overall responsibility for the effective operation of the Equal Opportunity & Anti-Discrimination Policy.
- 1.4** Liaison Officer for Persons with Disabilities & Complaints Officer for Transgender Persons have been appointed as per the Act. Liaison Officer, Complaints Officer & D&I Team will be in charge of the policy implementation. The policy is committed to eliminating all forms of unlawful discrimination (which includes direct or indirect discrimination and denial of reasonable accommodation), bullying, and harassment.
- 1.5** At TPL, we continuously strive to ensure that all our infrastructure, sites, offices, technologies, information, and privileges are accessible to all employees. Our decisions on employment, career progression, training, or any other benefits are solely based on merit.
- 1.6** TPL is committed to promoting awareness of equal opportunity for persons with disabilities and transgender among all employees by organizing training and sensitization programs and campaigns on an ongoing basis.

2.0 Scope & Applicability

- 2.1** This Policy covers job applicants, contractual employees, full-time/part-time employees, consultants, interns/trainees, including temporary employees of any nationality, race, color, religion, caste, gender identity/expression, sexual orientation, disability, HIV-positive status, pregnancy, social origin or status, indigenous status, political orientation, age, marital status or any other personal characteristic or status. This policy includes persons with disabilities covering those employees who acquire a disability during their work tenure and members of the LGBT+ community.
- 2.2** The Policy applies to all aspects of employment, be it physical/WFH/hybrid infrastructure, recruitment, training, working conditions, salaries, transfers, employee benefits, and career advancement.
- 2.3** Aligned with our commitment to equal opportunity, we extend our hiring initiatives across diverse functions including Administration, Information Technology, Human Resources, Supply Chain Management, Marketing & Communication, Strategy, and Legal.

3.0 Definitions

3.1 Discrimination

Discrimination in relation to disability, gender identity, sexual orientation, or HIV status means

any distinction, exclusion, or restriction based on disability/gender identity/sexual orientation or HIV status which is the purpose or effect of impairing or nullifying the recognition, enjoyment or exercise on an equal basis with others of all humans 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 or any other discrimination defined under sec. 2(h) of the RPwD Act 2016, sec. 2(d) of the HIV/AIDS Act 2017 and sec. 3 of the Transgender Persons (Protection of Rights) Act 2019 in relation to persons with disability, protected persons, and transgender persons respectively.

3.2 Harassment

Harassment is a form of discrimination. It includes any unwanted physical or verbal behavior that offends, humiliates, or embarrasses a person. Harassment may take the form of words, gestures, or actions which tend to annoy, alarm, abuse, demean, intimidate, belittle, humiliate, or embarrass another or which create an intimidating, hostile, or offensive work environment.

Harassment includes but is not limited to,

- a) Obscene acts, gestures, signing, recitation, or utterance of any obscene song, ballad, or words
- b) Assault or use of criminal force or abusive language
- c) Use of name-calling, slurs, or threats
- d) Display of obscene object
- e) Coercing to meet any unlawful demand
- f) Publishing, transmitting, or sharing private or morphed images against the wish of the person
- g) Prejudiced remarks or tasteless jokes about an individual's age or sexual orientation or gender identity or any other personal characteristics
- h) Intentionally socially alienating people based on nationality, race, color, religion, caste, gender identity/expression, sexual orientation, disability, HIV-positive status, pregnancy, social origin or status, indigenous status, political opinion, age, marital status, or any other personal characteristic or status

3.3 Sexual Harassment

Sexual Harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely;

- (a) Physical contact and advances;
- (b) A demand or request for sexual favors;
- (c) Making sexually colored remarks;
- (d) Showing pornography;
- (e) Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature.

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior may amount to Sexual Harassment:

- (a) Implied or explicit promise of preferential treatment in employment;

- (b) Any implied or explicit threat of detrimental treatment in employment;
- (c) Implied or explicit threat about the present or future employment status;
- (d) Interference with work or creating an intimidating or offensive or hostile work environment;
- (e) Humiliating treatment likely to affect the health or safety of the person.

3.4 **LGBTQ+** - Lesbian Gay Bisexual Transgender Queer (plus sign meant to cover anyone else in the spectrum)

Sexual Orientation

- a) **Lesbian** A woman who is sexually and/or romantically attracted to other women.
- b) **Gay** A person who is emotionally/sexually or romantically attracted to members of the same gender. Men, women, and nonbinary people may be referred to as gay in the common language if they are attracted to members of same-sex sex/gender/gender identity.
- c) **Bisexual** A person who is emotionally/sexually or romantically attracted to members of more than one gender/sex/gender identity.
- d) **Queer** An umbrella term for anyone who is non-cisgender or non-heterosexual.
- e) **Asexual** An individual who does not feel sexual attraction or desire towards anyone. The person can develop romantic feelings and desires.
- f) **Pansexual** An individual who is emotionally, romantically, or sexually attracted to people of any gender (regardless of gender).

3.5 **Gender Identity** A person's internal, deeply held sense of their gender.

3.6 **Gender Expression** External manifestation of gender, expressed through a person's name, pronouns, clothing, haircut, behavior, voice, and/or bodily characteristics.

- a) **Agender** A person who does not identify with any gender. They may also call themselves genderless.
- b) **Androgynous** A person whose gender expression combines aspects of typically masculine and feminine characteristics.
- c) **Bigender** A person who experiences two distinct gender identities either simultaneously or one gender at a time.
- d) **Gender-fluid** A person who rejects the binary of a man and a woman to describe their gender. They may feel more like a man one day and more like a woman on another and neither or both on other days.
- e) **Gender non-conforming** A gender identity that does not fit typical cultural masculine or feminine norms.
- f) **Genderqueer** Someone who queers gender. They may express a combination of typical masculine and feminine traits or neither. It is different from gender-fluid as they may not experience any change in their identity from day to day.

- g) **Non-Binary** A person who rejects the binary of a man or a woman and their gender identity expresses a combination of masculinity and femininity or neither.
- h) **Male to Female** A person who was assigned male at birth and transitions to female through surgery.
- i) **Female to Male** A person who was assigned female at birth and transitions to male through surgery.
- j) **Pangender** Someone who identifies as having more than one gender or all genders.

3.7 Transgender Person

As defined in the Transgender Persons (Protection of Rights) Act, 2019, a “transgender person” means a person whose gender does not match the gender assigned to that person at birth and includes trans-man or trans-woman (whether or not such person has undergone sex reassignment surgery or hormone therapy or laser therapy or such other therapy), a person with intersex variations, genderqueer and person having such socio-cultural identities as kinnar, hijra, aravani and jogta.

3.8 Person with intersex variations

“person with intersex variations” means a person who at birth shows variation in his or her primary sexual characteristics, external genitalia, chromosomes, or hormones from normative standards of a male or female body

3.9 Transition

The process of changing one’s gender from the sex assigned at birth to one’s gender identity. There are many ways to transition. For some people, it is a complex process that takes place over a long period of time, while for others it is a one or two-step process that happens more quickly. The transition may include “coming out” (telling family, friends, and coworkers); changing the name and/or sex on legal documents; and for many transgender people, accessing medical treatment such as hormones and surgery.

3.10 Persons with Disabilities

- a) **“Person with disability”** means a person with a long-term physical, mental, intellectual, or sensory impairment which, in interaction with barriers, hinders his full and effective participation in society equally with others.
- b) **“Person with benchmark disability”** means a person with not less than forty percent of a specified disability where a specified disability has not been defined in measurable terms and includes a person with a disability where a specified disability has been defined in measurable terms, as certified by the certifying authority.
- c) **“Specified disabilities”** are the disability categories mentioned in the Schedule of the Act. There is also “any other category”, which allows Central Government to add any other disability by issuing a notification.
- d) **“High support”** means intensive support, physical, psychological, and otherwise, which may be required by a person with a benchmark disability for daily activities, to take an independent and informed decision to access facilities and participate in all areas of life including education, employment, family and community life and treatment and therapy.

- e) **“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 rights equally with others.
- f) **Specified Disabilities** The specified disability categories (refer to Annexure I for detailed definition) as mentioned in the Schedule for The RPwD Act 2016 are:

i) Physical Disability	ii) Intellectual Disability	iii) Mental Behavior	iv) Caused Disabilities
a) Locomotor Disability i) Leprosy-cured person ii) Cerebral Palsy iii) Dwarfism iv) Muscular Dystrophy v) Acid Attack Victim b) Visual Impairment i) Blindness ii) Low Vision c) Hearing Impairment i) Deaf ii) Hard of Hearing d) Speech & Language Disability	a) Specified Learning Disabilities b) Autism Spectrum Disorder	a) Mental Illness	a) Chronic neurological conditions i) Multiple Sclerosis ii) Parkinson’s Disease b) Blood disorder i) Haemophilia ii) Thalassemia iii) Sickle Cell Disease

v) Multiple Disabilities (more than one of the above-specified disabilities)

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

3.11 HIV

HIV means Human Immunodeficiency Virus, which attacks and weakens the body’s immune system making the HIV-positive person susceptible to life-threatening conditions or other conditions.

“protected person” means a person who is - (i) HIV Positive; or (ii) ordinarily living, residing, or cohabiting with a person who is HIV positive; or (iii) ordinarily lived, resided, or cohabited with a person who was HIV positive

4. Details of the Policy

4.1 Facilities and Amenities

a) Physical Infrastructure

TPL aims to ensure that our physical infrastructure (access to buildings, furniture, facilities, and services in the building/campus) adheres to the accessibility standards prescribed by the Government of India. TPL also aims to revamp its existing buildings, to ensure strict compliance with the Standards. 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 facilities team at their location or write to the Liaison Officer/Complaints Officer. All job applicants, contractual employees, full-time/part-time employees, interns/trainees, including temporary employees have a right to safe and appropriate restroom and washroom facilities, including the right to use a restroom that corresponds to the employee's gender identity.

b) Digital Infrastructure

It is TPL's continuous endeavor to ensure that all our documents, communication, and information technology systems adhere to the accessibility standards.

c) Website Standards

Guidelines for Indian Government Websites (GIGW), as adopted by the Department of Administrative Reforms and Public Grievances, Government of India. Tata Projects Limited has a website compliant with the global standards (ADA and WCAG 2.0), the site offers an enhance, barrier-free user experience, thanks to the integration of advanced machine learning technologies.

d) Documents Standards

Electronic Publication (ePUB) or Optical Character Reader (OCR) based pdf formats. We will ensure that only accessible technologies are procured. Any employee facing accessibility challenges can reach out to the local IT support team or write to Liaison Officer/Complaints Officer/D&I Team

4.2 List of Positions Identified

In TPL, all positions are open for qualified applicants for employment without regard to their disability, race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, nationality, or ethnic origin. The hiring is purely based on merit and the candidates are evaluated based on their skills and competency. Flexibility and accommodations will be provided to persons with disabilities on an individual basis as detailed in the subsequent section.

5. Manner of Selection**5.1 Vacancy Advertisement & Application**

- a) Wherever applicable, all vacancies will be advertised internally (as per the IJP Policy: Policy no 10.02.03/P-01/R1) and externally (as per the Recruitment Policy: Policy no 10.01.02/P-05/R0 & Campus Recruitment Policy: Policy no 10.01.02a/P-01/R1).
- b) Wherever applicable, vacancies will be notified to colleges, polytechnics, and disability organizations.
- c) Wherever applicable, all vacancy advertisements will include an appropriate short statement on equal opportunities for persons with disabilities.
- d) 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.
- e) Application forms will be made available in alternate formats, based on request.

5.2 Selection Process**a) For Lateral Recruitment**

- i) For all positions, candidates must have a minimum of 10+2+3 Or 10+2+4 Or 10+3 years (Degree/Diploma) of education which must be recognized by the University Grants 14 Commission (UGC) or the All-India Council for Technical Education (AICTE). All the selection process shall be as per the existing recruitment policy of TPL (EPM Policy Process No: 10.01.02/R1)
- ii) The interview panel shall comprise subject matter experts, HR Manager & Liaison Officer/Complaints Officer/D&I Team. The hiring decision will be based on the merit of the candidate and the collective decision of the panel. The subject matter expert should be at least two levels above in the hierarchy of the position for which the interview is being conducted. If a person with a disability needs any specific reasonable accommodation for the interview, she/he should write to the recruiter or the Liaison Officer.
- iii) Each interviewer is mandated to record her/his comments on the candidate's capability in the Interview Assessment Sheet. Reasons for the rejection must be objective.
- iv) Any candidate who is being shortlisted/selected for the said vacancy will be purely basis the skills and competency of the candidature and there will be no discrimination related to nationality, race, color, religion, caste, gender identity/expression, sexual orientation, disability, HIV positive status, pregnancy, social origin or status, indigenous status, political orientation, age, marital status or any other personal characteristic or status.
- v) Wherever possible, more than one person must be involved in the selection interview and recruitment process, and all should have received appropriate training on the topic of equal opportunities.
- vi) In case of any other test/interview format is required basis the nature of disability for the position, the same shall be conducted in consultation with the Liaison Officer as per the RPwD Act 2016.
- vii) All the selection process shall be as per the existing recruitment policy of TPL (EPM Policy Process No: 10.01.02/R1)
- viii) As part of our equal opportunity policy, preference in transfers and job postings will be given based on qualifications, skills, and experience, ensuring fair and equitable opportunities for all employees and a conducive work environment.

b) For Campus Recruitment

- i) The eligibility criteria, tests & personal interview will be applicable as per the TPL's Campus Recruitment Policy (Policy no 10.01.02a/P-01/R1)
- ii) The interview panel shall comprise subject matter experts, HR Manager & Liaison Officer/Complaints Officer/D&I Team. The hiring decision will be based on the merit of the candidate and the collective decision of the panel. The subject matter expert should be at least two levels above in the hierarchy of the position for which the interview is being conducted. If a person with a disability needs any specific reasonable accommodation for the interview, she/he should write to the recruiter or the Liaison Officer.
- iii) Each interviewer is mandated to record her/his comments on the candidate's capability in the Interview Evaluation Form. Reasons for the rejection must be objective and not related to nationality, race, color, religion, caste, gender identity/expression, sexual orientation, disability,

HIV-positive status, pregnancy, social origin or status, indigenous status, political orientation, age, marital status or any other personal characteristic or status.

- iv) Any candidate who is being shortlisted/selected for the said vacancy will be purely basis the skills and competency of the candidature and there will be no discrimination related to nationality, race, color, religion, caste, gender identity/expression, sexual orientation, disability, HIV positive status, pregnancy, social origin or status, indigenous status, political orientation, age, marital status or any other personal characteristic or status.
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- vii) As part of our equal opportunity policy, preference in transfers and job postings will be given based on qualifications, skills, and experience, ensuring fair and equitable opportunities for all employees and a conducive work environment.

6. Other facilities

6.1 Training and Career Development

TPL will endeavor 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 with the Liaison Officer. The company 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.

6.2 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. TPL provides an option of paid disability leave for a period of eight (8) days in a calendar year for renewal of disability certificates, medical checkups, and for participating in conferences/seminars/training/workshops related to disability. The procedure for availing of the leave is detailed in the TPL's Leave Policy (Policy no. 10.03.01/P-15/R3)

6.3 Adoption/Surrogacy Leave

Female employees or an LGBTQ+ employee who is the primary caregiver are entitled to adoption/surrogacy leave. In case of legal adoption or surrogacy, the employee is entitled to 12 weeks from the day of legal custody of the child. The procedure for availing of the leave is detailed in the TPL's Leave Policy (Policy no. 10.03.01/P-15/R3)

As per Surrogacy (Regulation) Act 2021, commercial surrogacy is prohibited in India and thus Surrogacy Leave shall not be applicable in the case of commercial surrogacy.

6.4 Travel, Stay, and Transport

For official travel (local, outstation, and international), persons with disabilities/Transgender 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 (in case of requirement for a person with disability), will be provided, as per our reasonable accommodation guidelines provided in the RPwD Act 2016. An employee can place a written request for this with the Travel Officer & Liaison Officer.

6.5 Career and Development

All employees will be given equal opportunities to apply and get selected for positions (based on their qualifications and required experience as per the PMS policy). There will be no discrimination based on nationality, race, color, religion, caste, gender identity/expression, sexual orientation, disability, HIV-positive status, pregnancy, social origin or status, indigenous status, political orientation, age, marital status, or any other personal characteristic or status.

6.6 Employee Engagement and Social Inclusion

TPL will endeavor to make all company events and meetings inclusive by ensuring that these are conducted at accessible venues with a provision of reasonable accommodation available to persons with disabilities.

7. Governance Framework

The CHRO is responsible for ensuring that the establishment operates in compliance with The RPwD Act 2016, HIV/AIDS 2017, and Transgender Persons Act 2019, and to fulfill the terms of this Policy.

CHRO & D&I Team will take the lead in implementing the program and for planning, monitoring, and reviewing the program's progress to ensure compliance with this policy.

The admin team will take the lead in implementing the changes in physical infrastructure and will take the lead in implementing the program and planning, monitoring, and reviewing the program progress to ensure compliance with this policy and the accessibility standards set by Tata Projects and the Government of India.

CIO will take the lead in ensuring the readiness of digital infrastructure to ensure compliance with this policy and the accessibility standards set by Tata Projects and the Government of India.

The D&I Team will share the progress reports with CHRO who will present the report to MD quarterly.

7.1 Liaison Officer

As per the mandate of The RPwD Act, 2016, TPL has appointed a Liaison Officer (refer Annexure III) who will be responsible for taking initiative and providing the requisite support needed to realize the goals of an inclusive and accessible workplace and reasonable accommodation. Reasonable Accommodation Form is available in Annexure II.

The Liaison Officer is responsible for:

- a) Implementing the action plan for making the workplace and IT systems accessible for persons with disabilities by liaising with the various departments in the organization.
- b) Ensuring that all employees are aware of the Equal Opportunity Policy and know their duties and rights in relation to the Equal Employment Opportunity policy along with the D&I team.
- c) Develop proactive strategies to prevent discrimination and harassment. The Liaison Officer & D&I team will share the quarterly progress report with the CHRO. 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.

7.2 Complaint Officer

As per the Transgender Persons (Protection of Rights) Act 2019, and the HIV & AIDS (Prevention and Control) Act 2017 respectively, selected members have been appointed as Complaint Officers, who will be responsible for providing requisite support to realize the goals of an inclusive and discrimination-free, trans-friendly workplace in relation to the “transgender person” and “protected person” respectively defined under the above said Acts.

The Complaints Officers shall be responsible for the adherence of compliance under the said Acts:

- a) To investigate and resolve the cases of complaints or grievances received from transgender employees, protected persons, and other trainees, candidates, interns, and contract workers.
- b) To support in implementing policy and action plan for making workplace and IT systems accessible and inclusive for transgender employees, protected persons, and other trainees, candidates, interns, and contract workers along with D&I Team.
- c) Proactively working towards the prevention of discrimination or harassment of employees, trainees, interns, contract workers, and candidates.

7.3 D&I Team

- a) Ensuring awareness of Equal Opportunity and Anti-Discrimination Policy within the company.
- b) To annually organize workshops and awareness programs for sensitizing employees to the provisions of the HIV / AIDS (Prevention & Control) Act 2017, the Transgender Persons (Protection of Rights) Act 2019, The Rights of Persons with Disabilities Act 2016 & Equal Opportunity & Anti-Discrimination Policy.
- c) Providing support in the formulation of a list of posts identified as suitable for PWD employees.
- d) Suggesting the manner of selection for PwD and transgender for various posts, post-recruitment, and pre-promotion.
- e) Suggesting training, preference in transfer, and positing, special leave.
- f) Supporting in implementing policy and action plans for making workplace and IT systems accessible for such employees.
- g) Investigating and resolving the cases of complaints or grievances received from PWD/Transgender employees and other trainees, candidates, interns, and contract workers.
- h) To proactively work towards the prevention of discrimination or harassment of PwD & Transgender employees, trainees, interns, apprentices, contract workers, and candidates respectively.

8. Grievance Redressal

The organization will follow the same procedure for inquiring and investigating the complaints or concerns raised by employees with a disability as for other employees. However, reasonable accommodation will be provided to employees with disabilities to effectively participate in the investigation process. The complaint needs to be raised within 30 days of the incident happening, and complete investigation and resolution needs to be provided within 90 days. In special cases, the timeline can be further extended to another 90 days.

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

All grievances related to the prevention of sexual harassment at the workplace (POSH) will be governed by the POSH Policy (Policy No. 10.03.01/P-18/R2) and handled by the POSH Internal Committee. Any proven case of harassment proven will command punitive respect to consequence management guidelines (for sexual harassment) or domestic inquiry guideline (any other form of harassment) as the case may be.

Under the Transgender Persons (Protection of Rights) Act 2019, section 11, any complaint received needs to be addressed by the Complaints Officer, GRC & D&I team within 20 days and an inquiry report needs to be shared with the CHRO for taking the required action.

For grievances, employees can write to Liaison Officer, Complaint Officer, POSH Presiding Officer, or D&I Team. For all complaints, the confidentiality of the complainant will be respected, keeping in mind the sensitivity of the subject matter. The CHRO shall take action on the inquiry report submitted in accordance with the provision of the law. Tata Projects has a well-established employee resource group, and a Grievance Redressal Cell can be formed by ERG members in case of any investigation required for persons with disability or transgender persons.

9. Maintenance of Records

TPL understands and respects that sharing information about one's disability/gender identity is a personal preference.

The 'person with disability', 'person with benchmark disability' having high support needs' defined under the RPwD Act 2016, or employees who have a disability or medical condition and wish to share the information can fill out the self-identification to disclose their disability in HRMS. Also, given that disability or medical ailment can be acquired at any point, an employee can edit the information in the form at any time.

The 'protected person' defined under the HIV & AIDS Act 2017 may fill the voluntary disclosure of HIV-positive status in HRMS. (to be checked in HRMS)

During the period of employment at the company, the employee can edit such information at any time. Employees who are citizens of India can upload the certificate of disability issued by certifying authority of the appropriate government.

Employees can opt for declaring their gender identity or disability status at the time of recruitment or through HRMS. Employees may exercise the right to not disclose their gender identity at the workplace through prefer not to disclose option, in which case the gender identity will be populated as 'prefer not to disclose'.

In the case of Transgender Persons who are citizens of India, concerned persons can upload their transgender certificate issued by a District Magistrate or Identity Card issued by the authority of the concerned Appropriate Government which would help them in availing government benefits. Certain types of records, like those relating to payroll and retirement accounts, may require a legal name change before the person's name can be changed in case of transition. As quickly as possible, we shall make every effort to update any photographs at the transitioning employees' workplace, so the transitioning employees' gender identity and expression are represented accurately.

10. Affirmative Action

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

- a. Participation in job fairs, training, and scholarship programs and organizing special recruitment drives and training and employment of persons with disabilities who have high support needs.
- b. All training programs conducted for people from lower socio-economic backgrounds will be inclusive.

11. Exceptions

Any exception to this policy regarding the process to be followed requires the approval of CHRO.

12. Amendments

The Company reserves the right to amend the Policy from time to time in order to comply with any laws/rules/regulations that come into effect from time to time, related to RPwD Act 2016, HIV/AIDS Act 2017, & Transgender Persons Act 2019.

13. Evaluation of Policy

The Policy shall be evaluated by the D&I Team & CHRO from time to time (preferably on annual basis) so that any amendment(s) required may be recommended to the Management Committee (MC) based on their experience of dealing with complaints. Upon receipt of such recommendation(s), the MC may consider amending the Policy.

ANNEXURE I

Specified Disabilities

1. Physical disability

A. Locomotor disability (a person's inability to execute distinctive activities associated with movement of self and objects resulting from affliction of the musculoskeletal or nervous system or both), including

(a) "leprosy-cured person" means a person who has been cured of leprosy but is suffering from

(i) loss of sensation in hands or feet as well as loss of sensation and paresis in the eye and eyelid but with no manifest deformity;

(ii) manifest deformity and paresis but have sufficient mobility in their hands and feet to enable them to engage in normal economic activity;

(iii) extreme physical deformity as well as advanced age which prevents him/her from undertaking any gainful occupation, and the expression "leprosy cured" shall be construed accordingly;

(b) "cerebral palsy" means a Group of non-progressive neurological conditions affecting body movements and muscle coordination, caused by damage to one or more specific areas of the brain, usually occurring before, during, or shortly after birth;

(c) "dwarfism" means a medical or genetic condition resulting in an adult height of 4 feet 10 inches (147 centimeters) or less;

(d) "muscular dystrophy" means a group of hereditary genetic muscle diseases that weakens the muscles that move the human body and persons with multiple dystrophy have incorrect and missing information in their genes, which prevents them from making the proteins they need for healthy muscles. It is characterized by progressive skeletal muscle weakness, defects in muscle proteins, and the death of muscle cells and tissue;

(e) "acid attack victims" means a person disfigured due to violent assaults by throwing acid or a similar corrosive substance.

B. Visual impairment

(a) "blindness" means a condition where a person has any of the following conditions, after the best correction

(i) total absence of sight; or

(ii) visual acuity less than 3/60 or less than 10/200 (Snellen) in the better eye with the best possible correction; or

(iii) limitation of the field of vision subtending an angle of less than 10 degrees.

(b) "low vision" means a condition where a person has any of the following conditions, namely

(i) visual acuity not exceeding 6/18 or less than 20/60 up to 3/60 or up to 10/200 (Snellen) in the better eye with best possible corrections; or

(ii) limitation of the field of vision subtending an angle of less than 40 degrees up to 10 degrees.

C. Hearing impairment

(a) "deaf" means persons having 70 DB hearing loss in speech frequencies in both ears;

(b) "hard of hearing" means the person having 60 DB to 70 DB hearing loss in speech frequencies in both ears;

D. "speech and language disability" means a permanent disability arising out of conditions such as laryngectomy or aphasia affecting one or more components of speech and language due to organic or neurological causes.

2. Intellectual disability, a condition characterized by significant limitations both in intellectual functioning (reasoning, learning, problem-solving) and in adaptive behaviour which covers a range of every day, social, and practical skills, including

(a) "specific learning disabilities" means a heterogeneous group of conditions wherein there is a deficit in processing language, spoken or written, that may manifest itself as a difficulty to comprehend, speak, read, write, spell, or do mathematical calculations and including such conditions as perceptual disabilities, dyslexia, dysgraphia, dyscalculia, dyspraxia, and developmental aphasia;

(b) "autism spectrum disorder" means a neuro-developmental condition typically appearing in the first three years of life that significantly affects a person's ability to communicate, understand relationships, and relate to others, and is frequently associated with unusual or stereotypical rituals or behaviours.

3. Mental behaviour,

"mental illness" means a substantial disorder of thinking, mood, perception, orientation or memory that grossly impairs judgment, behavior, capacity to recognize reality, or ability to meet the ordinary demands of life, but does not include retardation which is a condition of arrested or incomplete development of mind of a person, especially characterized by sub normality of intelligence.

4. Disability caused due to

(a) chronic neurological conditions, such as

(i) "Multiple sclerosis" means an inflammatory, nervous system disease in which the myelin sheaths around the axons of nerve cells of the brain and spinal cord are damaged, leading to demyelination and affecting the ability of nerve cells in the brain and spinal cord to communicate with each other.

(ii) "Parkinson's disease" means a progressive disease of the nervous system marked by tremors, muscular rigidity, and slow, imprecise movement, chiefly affecting middle-aged and elderly people associated with degeneration of the basal ganglia of the brain and a deficiency of the neurotransmitter dopamine.

(b) Blood disorder

(i) "haemophilia" means an inheritable disease, usually affecting only males but transmitted by women to their male children, characterized by loss or impairment of the normal clotting ability of blood so that a minor would result in fatal bleeding;

(ii) "Thalassemia" means a group of inherited disorders characterized by reduced or absent amounts of haemoglobin.

(iii) "Sickle cell disease" means a haemolytic disorder characterized by chronic anaemia, painful events, and various complications due to associated tissue and organ damage; "haemolytic" refers to the destruction of the cell membrane of red blood cells resulting in the release of haemoglobin.

5. Multiple Disabilities (more than one of the above specified disabilities) including deaf blindness which means a condition in which a person may have combination of hearing and visual impairments causing severe communication, developmental, and educational problems.

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

ANNEXURE II

REASONABLE ACCOMMODATION FORM

This form is for requesting reasonable accommodation with respect to equal opportunity policy

Name:

Employee ID:

Department:

Location:

1. Please describe the accommodation (s) you are requesting. If there is more than one accommodation that you believe will meet your needs, please describe all possible accommodations.

2. Please describe your medical condition and/or other reason (s) why you are requesting accommodation. For current employees, include a description of the essential functions of your job that you currently are unable to perform, and explain how the requested accommodation (s) will enable you to perform those essential functions of your job.

ANNEXURE II

REASONABLE ACCOMMODATION FORM (contd...)

3. For how long the requested accommodation(s) will be needed. (Please specify dates)

4. Please attach to this form any documentation that you believe supports your need for the requested reasonable accommodation. Please also provide any other information that you believe is relevant to your request.

I certify that the information contained on this form and submitted with this form is true and correct.

Signature

Date

Approved by:

ANNEXURE III

Circular

Liaison Officer for RPwD Act, 2016

Dear Colleagues,

As per the mandate of the RPwD Act, 2016, Tata Projects Limited has appointed **Mr. S. Pranesh Levi (DGM-HR)**, as a Liaison Officer, who will be responsible for taking the initiative and providing the requisite support needed to realize the goals of an inclusive and accessible workplace and reasonable accommodation.

The Liaison Officer is responsible for:

- d) Implementing the action plan for making the workplace and IT systems accessible for persons with disabilities by liaising with the various departments in the organization.
- e) Ensuring that all employees are aware of the Equal Opportunity Policy and know their duties and rights in relation to the Equal Employment Opportunity policy along with the D&I team.
- f) Develop proactive strategies to prevent discrimination and harassment.

The Liaison Officer will share the quarterly progress report with the CHRO, who will then present the progress report to the CEO/MD and the Employee Resource Group.

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.

Contact Details: Mr. S. Pranesh Levi - praneshsl@tataprojects.com