

22.0 Environment, Social & Governance
P22.6 Equal Opportunity Policy
Vardhman Group

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22.6.1. Objective

The objective of this policy is to ensure that all decisions relating to employment practices shall be objective, free from bias, and based solely upon work criteria and individual merit. The Company is responsive to the needs of its employees, customers, and the community at large, and we are an organization that uses everyone's talents and abilities and where diversity is valued. Our goal is to create a workplace where diversity is valued and where everyone has the opportunity to contribute to their fullest potential.

22.6.2. Scope & Applicability

This policy applies to all categories of employees of Vardhman Group including workmen, contractual workmen, sub-staff & above employees, interns, and retainers.

Furthermore, this policy extends its coverage to the stakeholders including suppliers, partners, contractors, and other affiliated parties who are part of the Vardhman Group value chain.

Additionally, it shall also apply to differently abled persons.

22.6.3. Definition

1. **Discrimination:** shall mean treating a person or group of people less favorably than you would treat another person or group of people in the same circumstances. This could be either intentional or unintentional. Discrimination, whether intentional or unintentional, is a very serious matter and could result in both legal and disciplinary action.

22.6.4. General Guidelines

1. Vardhman is committed to fostering an environment of equality, dignity, and respect for all employees.
2. Vardhman prohibits discrimination or harassment based on the following grounds or any combination of the following grounds:
 - Age
 - Gender,
 - Caste,
 - Creed,
 - Religion,
 - Language,
 - Ethnicity,
 - Disability,
 - Sexual orientation,
 - Race,
 - Colour,
 - Marital Status
 - Any other status protected by appropriate laws.

3. Vardhman is committed to creating a working environment free from discrimination and where all employees are treated equally with dignity, courtesy, and respect. Vardhman aims to do this by:
 - Ensuring that everyone receives equal treatment in all aspects of employment policies and practices regardless of age, color, disability, disfigurement, gender, race or caste, sexual orientation, gender, hours of work, marital or civil partner status, nationality, ethnic or national origin, political opinions, religion or beliefs.
 - Developing a diverse workforce and conducting business, staffing procedures, and internal systems with the absence of discrimination.
 - Including contemporary principles of workforce diversity in the company's policies, protecting everyone from the presence of discrimination.
 - Creating an environment free from discrimination and vilification where all employees are treated with dignity, courtesy, and respect.
 - Setting standards of acceptable behavior for all employees.
 - Ensuring that all employees know their rights and responsibilities.
 - Vardhman has a zero-tolerance policy towards discrimination based on any of these characteristics.
4. Vardhman ensures that all employment practices, from recruitment and selection to training, appraisal, promotion, and beyond, are free from discrimination.

22.6.5. Special Provision with Person with Disability

To ensure inclusion and accessibility, Vardhman commits to:

- **Facilities and Amenities:** Providing assistive devices, barrier-free accessibility, and other provisions to enable employees with disabilities to effectively discharge their duties.
- **List of Designations:** Identifying and publishing a list of positions suitable for persons with disabilities within the organization.
- **Recruitment and Selection:** Establishing a fair selection process for persons with disabilities, and ensuring no discrimination during recruitment or promotion.
- **Training and Development:** Designing post-recruitment and pre-promotion training programs for employees with disabilities.
- **Preference in Transfers and Postings:** Providing preference in transfers and postings to accommodate the needs of persons with disabilities.

- **Special Leaves and Facilities:** Offering special leave policies, preferential allocation of residential accommodation, and other supportive facilities.
- **Liaison Officer:** Appoint a Liaison Officer to oversee recruitment, training, and retention of employees with disabilities.

22.6.6. Roles & Responsibilities

- Management has a responsibility to ensure awareness of this policy to employees and investigate any complaints.
- Employees are responsible for maintaining a respectful workplace and reporting any discrimination.
- It is the responsibility of each individual not to indirectly support unfair behavior by ignoring what is happening around them and shall report any observation of such behavior to the authorities.
- At the time of selection of suppliers or vendors, it is the responsibility of the Procurement team to ensure that the supplier/ vendor company does not engage in discrimination on any of the grounds mentioned in this policy.
- The recruiters shall be responsible for ensuring that candidates are not discriminated against on any of the grounds mentioned in this policy. Recruitment shall be done only as per the requirement of the role.
- It is the responsibility of all Head of the Department to ensure no discrimination is done against any employee at the time of Performance Appraisals or Promotions.

22.6.7. Training & Awareness

- Vardhman mandates company-wide training programs on equal opportunity issues to enhance awareness among employees, suppliers, and partners.
- Periodic assessments and refresher sessions are conducted by the Unit HR/L& D Team to ensure alignment with current & ongoing standards.

22.6.8. Grievance Redressal Mechanism

A formal grievance/complaint mechanism is in place to address concerns related to discrimination or harassment. All grievances are handled confidentially and impartially. Employees may report discrimination or harassment to the committee constituted by the management. The mechanism is as follows:

22.6.8.1. Grievance Committee Formation

- A Grievance Committee has been constituted by the management, consisting of representatives from HR, legal, and neutral employees from diverse departments to ensure impartiality.
- The Grievance Committee has a Liaison Officer as well, particularly for grievances related to employees with disabilities.

22.6.8.2. Grievance Committee Members

##	Designation	Name	Department	Role
1	Chairperson	Displayed in respective Units	Human Resources	The HR representative will lead the committee, ensure adherence to policies, and facilitate the grievance process.
2	Senior Management Representative		e.g., Operations, Finance, etc.	To offer senior leadership insights and ensure the grievance process aligns with the organization's strategic goals.
3	Legal/ Compliance/ Liaison Officer		Legal	To ensure that the grievance process complies with relevant laws and regulations, mitigating legal risks.
4	Employee Representative		e.g., Production, Marketing, etc.	To represent the interests of employees and provide their perspective in the grievance resolution process.
5	Departmental Representative		e.g., IT, Finance, etc.	To offer department-specific insights into the grievance, as applicable.
6	External Mediator / Advisor (Optional)	(Optional)	(Optional)	An independent third-party expert who can offer an unbiased perspective and assist in resolving complex grievances.

22.6.8.3. Reporting Mechanism

Employees can report incidents of discrimination, harassment, or any policy violation through the following channels:

- i. Writing to ethics@vardhman.com.
- ii. Direct submission to the respective unit grievance committee/ in writing to the HR department, outlining the issue and desired resolution.

22.6.8.4. Acknowledgment of Grievance

Once a grievance is reported, an acknowledgment will be sent to the complainant within 24 hours.

22.6.8.5. Investigation Process

- The committee will conduct an initial review of the grievance to determine its validity and severity and will initiate a thorough investigation within 48 hours basis its validity and severity.
- The committee will investigate the matter, speak with the concerned parties, gather relevant evidence, and analyze the situation.
- Interviews, evidence gathering, and cross-examinations will be conducted confidentially and impartially.
- The investigation process will aim to conclude within 15 working days.

22.6.8.6. Resolution and Remedial Action

- After reviewing the findings, the committee will propose a resolution/ appropriate remedial action, ensuring all actions are within legal and company policy bounds, including counseling, training, disciplinary action, or legal proceedings if necessary.
- The complainant will be informed of the resolution and measures taken to address their grievance and take necessary follow-up actions if required.

22.6.8.7. Appeal Process

- If the complainant is not satisfied with the resolution, they can escalate the matter to a higher authority within the organization.

22.6.8.8. Confidentiality and Non-Retaliation

- All matters discussed within the Grievance Committee will be kept strictly confidential to maintain the integrity of the process and protect the privacy of all parties involved.
- Retaliation against employees who report grievances in good faith is strictly prohibited and will be subject to disciplinary action.

22.6.8.9. Grievance Register

- An online register is maintained to document all grievances, resolutions, and follow-up actions for future reference and policy improvement.

22.6.8.10. Meeting Frequency

- The Committee will meet As & When needed when a grievance is reported.

22.6.9. Governance

- The Environment, Social & Governance (ESG) Committee of the Board shall govern the Equal Opportunity policy.
- A designated committee oversees the implementation and adherence to this policy.
- This committee is responsible for periodic assessments and reporting compliance to the management.

22.6.10. Policy Review

This policy will be reviewed As & When needed, to assess its effectiveness, fairness, and inclusiveness of practices that aim to prevent discrimination and promote equal opportunities for all individuals, regardless of their race, gender, age, disability, religion, or other protected characteristics.