

EQUAL OPPORTUNITY POLICY

1. Overview

KEC International Limited ('the Company') recognizes the value of a diverse workforce. We are committed to providing equal opportunities in employment and creating an inclusive workplace and work culture in which all employees are treated with respect and dignity. Workforce diversity is a business imperative, and we will strive to ensure that our workforce is representative of all sections of the society. We believe that, by doing so, 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') and Central Government Rules, 2017. We will always abide by the principles of the Policy in letter and in spirit.

2. Policy Statement

The Company is committed to eliminating all forms of unlawful discrimination (which includes direct discrimination, indirect discrimination, and denial of reasonable accommodation), bullying and harassment of people with disabilities. We continuously strive to ensure that all our facilities, technologies, information, and privileges are accessible to people with disabilities. We encourage candidates with different disabilities to apply. Our decisions on employment, career progression, training or any other benefits are based on merit and job fitment. We follow an inclusive 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 perform his job. 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 organisation will invest in re-skilling the employee for another position at the same rank. The Company is committed to promoting awareness on equal opportunity and inclusion of people with disabilities among all employees by organising training and sensitisation programs and campaigns.

3. Scope

The Policy covers all people with disabilities in the Company. They could be job applicants, full time/part-time employees, interns/trainees, contractual employees, including temporary employees. It also covers those employees who acquire disability during their work tenure.

4. Objective

To foster a work environment where employees with disabilities are provided with equal access, opportunity, and dignity, and are empowered to contribute fully without barriers.

5. 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 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.
- "Specified disabilities" are the disability categories mentioned in the Schedule of the RPWD Act.
- There is also "any other category", which allows Central Government to add any other disability by issuing a notification.
- "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 to persons with disabilities the enjoyment or exercise of rights equally with others.

6. Policy Details

1. Facilities and amenities

a) Physical Infrastructure

The Company shall endeavor to ensure that it provides barrier-free accessibility to Persons with Disabilities and that its physical infrastructure is disabled-friendly. Towards this end, the Company shall, on a continuous basis, liaise with service providers, facility managers or such other appropriate persons who manage the premises within which its offices are located, in order to endeavor to observance of the accessibility standards prescribed under the RPWD Act in relation to its physical infrastructure. On a case to case basis, the Company may also opt to provide assistive devices for the convenience of Persons with Disabilities. Employees facing accessibility issues in relation to the physical infrastructure of the Company or with regard to any other issue, are requested to report the same to the Liaison Officer.

b) Digital Infrastructure

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

c) Reasonable Accommodation

The Company 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:

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

Examples of reasonable accommodations may include (but not limited to) acquiring or modifying equipment or devices, modifying assessment and training materials, modifying work schedules, reassignment to a vacant position.

2. List of positions identified

At the Company all supervisory positions are open for people with all types of disabilities provided their job requirement does not possess any safety hazard to individual.

3. Manner of selection**a) Vacancy advertisement and application**

The hiring process is merit-based, and the candidates are judged purely on their skills and competency. All the positions are published on the Company's career page, professional networking websites and job portals.

b) Selection Process

The shortlisting and selection of candidates will be done as per the job description and the process ahead will be based on the pre-hire assessments. Candidates who clear the pre-hire assessments will be interviewed.

4. Other facilities**a) Training and Career development**

The Company 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. 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. The establishment conducts yearly training

programs on 'Objective Performance Appraisal Process' for all Managers.

b) 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.

c) Travel, stay and transport

For official travel (local, outstation and international), employees with disabilities will be provided accessible modes of transport as per the Company's domestic travel policy.

d) Employee Engagement and social inclusion

The Company 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 being available to employees with disabilities.

7. Governance Framework

The Company has constituted a Diversity & inclusion Council for ensuring that the establishment operates in compliance with the RPWD Act and to fulfil the terms of this Policy. The HR Head takes a lead in implementing the program and is responsible for planning, monitoring and reviewing the program re's progress to ensure compliance with the Policy.

1) KEC Diversity & Inclusion Council

Diversity and inclusion council comprises of representatives of relevant support functions along with business leaders, champion of persons with disability initiative and one external member who has extensive knowledge of disability issues.

The charter of the Diversity & Inclusion Council is to:

- Collect periodic feedback from various stakeholders on disability barriers.
- Create an annual action plan based upon the feedback received.
- Allocate budget to implement the plan.
- Monitor the progress of the plan to ensure that the required targets are met. The Council reports annually on the various equal opportunity activities undertaken.

2) Liaison Officer

As per the mandate of the RPWD Act, the Company has appointed Mrs. Meetal Vyas as a Liaison Officer who is responsible for taking initiative and providing the requisite support needed to realise the goals of an inclusive and accessible workplace and reasonable accommodation.

The Liaison Officer is responsible for:

- Implementing the action plan for making the workplace and IT systems accessible for

people with disabilities by liaising with the various departments in the organisation.

- Ensuring that all employees are aware of the Equal Opportunity Policy and know their duties and rights in relation to the Equal Opportunity policy.
- Developing proactive strategies to prevent discrimination and harassment. The Liaison Officer will share the quarterly progress report with the HR Head who would then present the progress report to the CEO and the Accessibility Inclusion Council. 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.

8. Maintenance of Records

The Company has a robust and well-defined process for capturing and maintaining the records of its employees. The Company 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 reach out to their Manager/HR Manager and fill the Voluntary Self-Identification to disclose their disability. Employees who are citizens of India can share with payroll team their disability certificate issued by Government of India, which would help them avail Government benefits like income tax exemptions. Confidentiality of the data will be maintained with certain exceptions like data being made available for security and other relevant functions for ensuring reasonable accommodations. The information will be shared on need basis, on the discretion of the Liaison Officer.

9. Grievance Redressal

The Company has a well-defined grievance redressal mechanism, 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. The Company 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 people independently and fairly. While the Company considers 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 behavior 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 people with deafness, accessible venue for people with locomotor disability, etc.

For complaints related to or raised by an employee with disability, the Liaison Officer will be consulted and involved by the Grievance Team to conduct the investigation. Employees can reach out to their manager/HR manager to voice concerns.

If an employee raises 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.

10. Affirmative Action

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

1. Participation in job fairs, training and scholarship programmes and organising special recruitment drives and training and employment of people with disabilities who have high support needs.
2. All training programmes conducted for people from lower socio-economic backgrounds will be inclusive.

Regards,

Somraj Roy
Chief Human Resources Officer