

PONDY OXIDES AND CHEMICALS LIMITED

EQUAL OPPORTUNITY POLICY

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I. CONTEXT:

The Government of India has enacted the Rights of Persons with Disabilities Act, 2016 (RPWD Act) and Rights of Persons with Disabilities Rules, 2017 to give effect to the principles enshrined in the United Nations Convention on Rights of Persons with Disabilities (2006). In pursuance of the RPWD Act, the Equal Opportunity Policy ("this Policy") is adopted by Pondy Oxides and Chemicals Limited (hereinafter referred to as "the Company" or "POCL"). POCL is committed to provide equal opportunities without any discrimination on the grounds of age, colour, disability, origin, nationality, religion, race, gender, or sexual orientation and will not engage in any kind of verbal or physical harassment based on any of the above or any other reason.

This Policy demonstrates the Company's commitment to promoting equality and conducting its business in accordance with the principles of social justice, respect, and freedom of expression, as well as in compliance with the Company's Code of Conduct.

II. OBJECTIVE:

The objective of this Policy is to ensure that there is no discrimination against any individual based on their gender, sexual preference, religion, race, colour, or disability.

This Policy encompasses the criteria for selecting new employees. The selection process will be determined by the job requirements and the candidate's qualifications and capability to perform or train for the position in question. Job specifications and descriptions will be confined to those criteria that are essential for the effective execution of the role. Candidates seeking employment, promotion, or transfer will be evaluated impartially against the job requirements. The Company will diligently avoid any form of bias or prejudice towards individual differences, which will be respected and safeguarded.

III. APPLICABILITY:

This Equal Opportunity Policy applies to all prospective or current employees of POCL and all its subsidiaries, affiliates, joint ventures and group companies (referred to as "Company") who are vulnerable to discriminatory treatment due to certain individual characteristics. It also covers employees who acquire disability during their work tenure.

IV. TERMS OF EMPLOYMENT, BENEFITS, FACILITIES & SERVICES:

The Company will identify posts / vacancies that are suitable for persons with special abilities/ differently abled. All terms of employment, benefits, facilities & services will be reviewed from time to time in order to ensure that there is no unlawful direct or indirect discrimination because of one or more protected characteristics.

Actions aiming towards equal opportunity include the following:

- Use of inclusive, diversity-sensitive language in all official documents and signs.
- ➤ Leave and flexible work arrangement policies to provide for parental, medical or other needs.
- ➤ Hiring, training & evaluation processes that only focus on characteristics relevant to employment, job specifications, qualifications, productivity etc.
- Ensuring the required employment benefits are provided to everyone irrespective of their gender, sexual preference, special ability, race, colour, etc.
- Infrastructure facilities, measures put in for safety & security, and amenities to be provided to employees so as to enable them to effectively discharge their duties in the establishment.
- > Open door practices to make the reporting of unlawful discriminatory conduct easier.
- Active encouragement of employees to propose improvements and explicit prohibition of discrimination with clearly defined consequences.

V. EQUAL PAY AND EQUALITY OF TERMS

The Company is committed to equal pay and equality of terms in employment. It believes that all its employees should receive equal pay where they are carrying out work. The Company endeavours to maintain a pay system that is transparent, free from bias and based on objective criteria.

VI. MAINTENANCE OF RECORDS

The Company shall maintain below mentioned records reflecting the details of the persons with special abilities that it has employed:

- No. of persons with special abilities employed and the date from which employed.
- Name, gender and address of such persons.
- Nature of special ability of such persons.
- Nature of work rendered by such persons.
- ➤ Kind of facilities provided to such persons.

VII. GRIEVANCE PROCEDURE

- (i) All supervisors and managers are responsible to ensure that policies of equal opportunity are applied at all times and that all procedures & practices are free of discrimination. All employees are obliged to follow legal guidelines and equal opportunity employer principles.
- (ii) In cases when these rules are violated, employees can take up the matter with their Plant Manager or Plant HR, as appropriate.
- (iii) If the issue is not resolved, they can report to the Liaison Officer. The complaint shall be investigated by the Liaison Officer within 15 days of receipt and reported to the Compliance Officer & Company Secretary. The Compliance Officer & Company Secretary shall take action on the investigation report within 7 days from the date of submission of the report. The aggrieved employee shall be protected against any kind of harassment, retaliation, and victimization.

VIII. <u>LIAISON OFFICER</u>

In accordance with Section 8(3)(e) of the RPWD Act, the Company has appointed General Manager – HR or person in charge of HR Department in Corporate Office as the Liaison Officer who shall oversee the implementation of the Equal Opportunity Policy and address any complaints. He shall be responsible for:

- Ensuring a disable friendly workplace;
- Ensuring that all employees are aware of this policy and know their duties and rights in relation to the Policy; and
- ➤ Developing proactive strategies to prevent discrimination and harassment.

IX. BREACH OF POLICY

The Company shall regularly monitor the effects of selection decisions and personnel practices and procedures in order to assess whether equal opportunity is being achieved. The Company reserves the right to take disciplinary action or initiate criminal proceedings as and when it considers necessary in respect of all reported cases of violations of this policy. If anyone is involved in harming, injuring or endangering the life, safety, health or well-being, whether mental or physical, of a transgender person, differently abled person or any other vulnerable person through acts including but not limited to causing physical abuse, sexual abuse, verbal and emotional abuse and economic abuse shall be punishable as per the applicable law and appropriate disciplinary action will be taken.

X. COMMUNICATION OF POLICY

This Policy shall be published on the Company website https://pocl.com/.