

EQUAL EMPLOYMENT OPPORTUNITY PERSONS WITH DISABILITY

OGPL/HR/EEO persons with Disability Policy/2022

1st Apr 2022

1. Objective

Orient Green Power Company Limited and its Subsidiaries has endeavored to capture the spirit of the above national and international statutes in EEO and Anti-Discrimination Policy.

Orient Green Power Company Limited and its Subsidiaries is committed to promoting equal employment opportunities and a workplace that is free of all forms of discrimination. Equal opportunity means that all staff experience fairness, impartiality and equal access to all career initiatives in the Orient Green Power Company Limited and Its subsidiaries.

Orient Green Power Company Limited and Its subsidiaries commitment to equal opportunity promotes an inclusive work environment that values and accepts the diverse cultural and social backgrounds of its staff.

2. Scope and Applicability

Applicable to HR and all the employees as well.

3. Definition/Glossary

Term / Abbreviation	Definition / Expansion
EEO	Equal Employment Opportunity

4. Policy/Process

4.1. Policy Objective

The objectives of this Equal Employment Opportunity (EEO) and Anti-Discrimination Policy are to ensure that all:

- Orient Green Power Company Limited and Its subsidiaries's employees or potential employees do not suffer unfair discrimination in the workplace.
- Individuals and groups within the Orient Green Power Company Limited and Its subsidiaries work in an environment where all decisions are free of discrimination, where they have equal opportunity based on relevant abilities, skills and merit.
- Employees are encouraged to take positive action towards promoting equal opportunity throughout the organization.
- Personnel actions such as compensation, benefits, transfers, layoffs, company-sponsored training programs and social and recreational programs will be administered on a non- discriminatory basis.
- Application of labour laws to be uniformly applied in the organization.

4.2. EEO and Provisions of Services

It refers to the principle which ensures that all employees and potential employees of Orient Green Power Company Limited and Its subsidiaries are treated equitably and fairly regardless of their race, sex or disability. Everyone has an equal chance when applying for jobs, transfers, promotions, training opportunities and in their working conditions. The following activities shall be conducted in a uniform manner-

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- Recruitment procedure and selection criteria, for appointment or engagement of a person as an employee;
- Promotion and transfer of an employee;
- Training and staff development for an employee; and
- Terms of employment or any other employee related activity

4.3. What is Workspace discrimination

Discrimination occurs when someone is treated unfavorably because of a certain attribute. Discrimination may involve some or all of the following:

- Conduct that can be considered harassing, coercive or disruptive, including sexual harassment
- Making offensive 'jokes' about another worker's clan, ethnic background, colour, sex, appearance or disability
- Expressing negative stereotypes about particular groups e.g. "married women shouldn't be working."
- Judging someone on their political or religious beliefs rather than their work performance.
- Using selection processes based on irrelevant attributes such as ethnic or clan group, age, sex or disability rather than on knowledge, skills and merit.

4.4. Parameters of Discrimination - Strictly Prohibited

Orient Green Power Company Limited and Its subsidiaries and its employees shall strive to create a workplace that is free from discrimination in their employment practices against any potential or existing employees, and shall not discriminate on a person's:

- Age or other circumstances
- Colour
- Cultural or social beliefs such as religious
- Educational Background
- Race, ethnicity or nationality
- Spiritual, traditional or customary beliefs
- Political opinion
- Physical features or physical disabilities
- Gender identity and expression
- Marital status
- Pregnancy or judging the impacts of potential pregnancy on decisions
- Sexual orientation
- Health or physical disability or impairment
- Medical record
- Family responsibilities
- Trade Union membership
- Reserve disciplinary forces, e.g., police

4.5. Complaint process and procedures

A person wishing to make a complaint of discrimination can consult and file a complaint with the EEO & Anti-Discrimination Committee. The complaint should be made in writing or through mail and addressed to chairperson of the committee within 5 working days of any such incident of discrimination.

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The constitution of the Committee shall be-

- Chair of the " EEO & Anti-discrimination" Committee
- Internal Officers- 2 Members from Middle Level Management [One Female and One Male]
- HR Department Head.

4.6. EEO & Anti-Discrimination Committee members are follows:

#	Designation	Role in Committee
1	MD & CEO	Chair Person
2	Head Legal	Internal Officer-1
3	Ms.Kirithika.M-Company Secretary	Internal Officer-2
4	Head HR & Admin	Supporting officer

4.7. Process to be followed:-

Once a complaint has been filed with the EEO & Anti-Discrimination Committee:

4.7.1. Investigation

Once a complaint has been filed, an investigation will be undertaken within 3 working days. In instances where there is an alleged respondent, the respondent will be notified. The complainant and the respondent will both be interviewed along with any individuals who may be able to provide relevant information.

Where the alleged discrimination is an organizational practice or procedure, that practice or procedure will be investigated immediately. Where the investigation finds systemic discrimination within the organization, that practice or procedure will be changed promptly.

4.7.2. Counselling

Orient Green Power Company Limited and Its subsidiaries supports resolving matters through intervention provided that it is consistent with organizational duties, obligations and needs. Intervention can only be undertaken voluntarily. If both parties agree to participate, matters may be resolved through counselling in the following circumstances. Once the matter has been investigated and Orient Green Power Company Limited and Its subsidiaries has determined the facts of the case, Orient Green Power Company Limited and Its subsidiaries may use appropriate solutions applicable by law to the complainant; and, in rare instances, where the incident is an isolated event and the parties do not dispute the facts, Orient Green Power Company Limited and Its subsidiaries will act diligently to ensure that matters are dealt with in a manner that ensures the safety and protection of everyone within the organization as per the applicable laws.

4.7.3. Timelines

Orient Green Power Company Limited and Its subsidiaries will investigate all complaints immediately and will work towards the prompt resolution and prevention of discriminatory acts and practices. The first round of investigation and conclusion shall be arrived at within 10 working days from the date of filing of the complaint, if needed the committee can extend the timeline.

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4.7.4. Fairness

All complaints will be investigated in the same manner with the aim of promoting, fairness and equality.

4.7.5. Confidentiality and the Right to Privacy

Orient Green Power Company Limited and Its subsidiaries will preserve the confidentiality of all individuals involved in a discrimination complaint. The preservation of confidentiality may be affected by the employer's duty to prevent discrimination in/at Orient Green Power Company Limited and Its subsidiaries and by the alleged respondent's right to know the nature of the complaint being made against them and who has made it so that they can respond.

If the investigation fails to find evidence to support the complaint, no documentation concerning the complaint will be placed on the file of the respondent. Orient Green Power Company Limited and Its subsidiaries will retain all documentation for 12 months for informational purposes in the event that there is an internal appeal or a complaint filed with an outside agency.

4.7.6. Outcomes and Remedies

Orient Green Power Company Limited and Its subsidiaries will act swiftly to ensure that the discriminatory practice is stopped as soon as possible and may remedy the situation in a number of ways. Where the investigation determines that discrimination has occurred or the matter has been successfully mediated, outcomes may include moving the respondent to another department, changing the respondent's job duties, or a letter of apology and the protection of the complainant identity. It is ensured that the actions taken to remedy a discriminatory situation should not have a negative effect on the complainant. The Head HR & Admin will ensure that the discrimination ends and workplace harmony is restored in the company and will periodically monitor that the complainant is protected.

4.7.7. Appeal Process

Within 10 days from the result of the first round of investigation, either the complainant or the respondent may make a written request that an investigation be reviewed stating which aspect of the investigation is inadequate. The request must be submitted to MD & CEO of Orient Green Power Company Limited and Its subsidiaries, who will determine if the investigation is to be re-opened in order to address the concerns raised.

In case the appeal is taken up, then the investigation shall be completed within 15 working days by the same committee with the inclusion of an independent member. The result of the appeal shall be binding on the complainant, respondent and all related parties concerned for all purposes

5. Special Circumstance and Exception

No exception to this policy is allowed.

Any Deviation to this policy has to be approved by HR. Any changes to the policy has to be approved by Legal and Compliance.

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6. Non-compliance and Consequence

Any instances of discrimination or favouritism with proper evidence that comes to or is brought to the notice of the management will be dealt with strictly in accordance with the terms of this policy and any other appropriate policies of the company.

AUTHORISED SIGNATORY



**G.HARIKRISHNAN
HEAD HR & ADMIN**