



**DIVERSITY, EQUITY AND INCLUSION
(INCLUDING EQUAL OPPORTUNITY)
POLICY
OF
JAYASWAL NECO INDUSTRIES LIMITED**

Preamble

Jayaswal Neco Industries Limited (hereinafter referred to as "JNIL" or 'The Company') encourages diversity, equity and inclusion (including equal opportunity) at workplace. The Policy prohibits discrimination and harassment of any type and affords Diversity, Equity and Inclusion (including equal opportunity) to employees and applicants without regard to race, colour, religion, sex, sexual orientation, gender identity or expression, pregnancy, age, national origin, disability status, genetic information, protected veteran status or any other characteristic protected by law. JNIL aims to be an inclusive employer that provides equal opportunities to persons from all sections of society including Persons with Disabilities (PWD) in accordance with provisions of the Rights of Persons with Disabilities Act, 2016.

Scope

This Policy applies to all prospective and current Employees and Workers of the Company, as well as contractors and visitors, who are vulnerable to discriminatory treatment due to certain individual characteristics.

Coverage

This Policy applies to all aspects of the relationship between JNIL and its employees, including:

- Recruitment.
- Employment.
- Contractual employment
- Consultant employment
- Promotion.
- Transfer.
- Training.
- Working conditions.
- Wages and salary administration.
- Employee benefits and application of policies.

This policy also applies to the selection and treatment of independent contractors, personnel working in our premises who are employed by agencies, and any other persons or firms doing business for or with the Company.

Definitions

- **"Company"** means "Jayaswal Neco Industries Limited".
- **"Equity means"** equal employment opportunities, rewards and rights to employees and applicants without regard to race, colour, religion, sex, sexual orientation, gender identity or expression, pregnancy, age, national origin, disability status, genetic information, protected veteran status or any other characteristic protected by law.
- **"Diversity"** means varying characteristics of individuals reflected across every level of the Company.
- **"Inclusion"** means an act of including individuals in a way that they feel valued and accepted.
- **"Discrimination"** discrimination in relation to disability means any distinction, exclusion or 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"** shall have the meaning assigned to it under the Rights of Persons with Disabilities Act, 2016 i.e. 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.

- **“Person with Disability”** shall have the meaning assigned to it under the Rights of Persons with Disabilities Act, 2016 i.e. person with a 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.
- **“Policy”** shall mean this “Diversity, Equity and Inclusion (including Equal Opportunity) adopted by the Company.
- **“Liaison Officer”** for the purpose of this policy, the responsibilities of Liaison Officer are delegated to the person heading Human Resource Department of respective Plants/Offices of the Company.

Commitment:

The Company's relationship with all of its Employees shall be based on principles of diversity, equity and inclusion (including equal opportunity). Discrimination by the Company (or its Employees) on grounds like age, sex, gender, disability, ailment, religion, race, nationality, social or ethnic origin, colour, sexual orientation, political opinion and other personal characteristics unrelated to the inherent requirements of the job is strictly prohibited and shall be subject to disciplinary action.

The Company shall not discriminate with respect to any aspect of the employment relationship including the hiring/selection process, promotions, transfers, provision of training opportunities, compensation, employee benefits, termination or retirement policies and disciplinary practices. Further, with regard to Transgender persons, the Company shall maintain the confidentiality of the gender identity of the employees except where the Company or its representatives are required to disclose such information to government officials or in order to cater to or provide support to such Employees.

The Company shall endeavor to maintain diversity across all levels without prejudice to varying characteristics of individuals.

The Company shall promote sense of inclusion amongst employees so that they feel valued and accepted.

Equal Opportunity for the persons with disabilities:

The Company is committed to provide equal opportunity for persons with disabilities in accordance with the provisions of the Rights of Persons with Disabilities Act, 2016.

The Company encourages equal opportunity for persons with disabilities across all areas including but not limited to:

Selection process

The Company adopts a transparent selection process guided by the merit of the candidate. The Company shall review the selection criteria from time to time to ensure that it is not discriminatory against Persons with Disabilities. Upon request, application forms shall be made available in alternative formats that are convenient for Persons with Disabilities.

Facilities and Amenities

The Company shall as far as possible, endeavor to provide such facilities and amenities to Persons with Disabilities to enable them to effectively discharge their duties in the Company. The Company shall consider the specific and special needs of Persons with Disabilities employed by it and ensure that its facilities (including physical infrastructure, information and communication technology, safety and security and transportation system, if any, provided by the Company) are easily accessible.

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 the observance of the accessibility standards prescribed under the 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. Employees may report accessibility issues relating to the Company's information and communication technology, to the Liaison Officer.

Transportation System

Transportation facilities, if any, provided by the Company shall adhere to the accessibility standards prescribed under the Act. Persons with Disabilities facing accessibility issues are requested to report the same to the Liaison Officer.

Special leave

Upon request by a Person with a Disability, the Company may, at its discretion, allow special leave to such persons if such leave is required in connection with her/his disability.

Reasonable Accommodation

The Company may at its discretion offer Reasonable Accommodation to Persons with Disabilities to enable them to discharge the essential functions of their position in the Company. What constitutes Reasonable Accommodation may differ from case to case and shall be up to the discretion of the Company.

Training and career development

The Company shall ensure that all workshops, orientations or materials provided for post-recruitment and pre-promotion training of its employees are consistent with the needs of Persons with Disabilities. Depending on the role and special needs of Persons with Disabilities, the Company may at its discretion give preference to such persons in matters of transfers and posting and where applicable, allotment of residential accommodation.

Complaints

Where an employee believe they have experienced harassment, bullying or discrimination then they may either attempt to resolve the matter informally or invoke the formal complaint procedure under the Grievance Procedure to pursue their claim. All cases will be taken seriously, dealt with quickly and treated with the utmost confidence. Employees are advised to seek the advice of their Prospect representative at the earliest opportunity.

Grievance Redressal & Harassment Prevention:

The Company has directed person heading Human Resource Department of respective plants/Offices of the Company to act as the Liaison Officer who is responsible for taking initiative and providing the requisite support needed to realize the goals of this policy. The Liaison officer can be reached at the official email ids of the person heading Human Resource Department of respective plants/offices. **The Liaison Officer is 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
- Develop proactive strategies to prevent discrimination and harassment of employees.

Responsibility and Administration of the Policy

The Company's Board has overall responsibility for this Policy. However, The Human Resources Department has been delegated towards day-to-day responsibility for administering, tracking, communicating and reviewing this Policy and answering any questions that may arise.

Each department Head of the Company shall assist in the implementation of this Policy by disseminating it within their departments and creating in their departments respect for the seriousness of compliance with this policy.

All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the Policy and promote our aims and objectives with regard to equal opportunities. Managers will be given appropriate training on Diversity, Equity and Inclusion (equal opportunities) awareness and to follow best recruitment and selection practices. Human Resource Department has overall responsibility for imparting such training.

No retaliatory action will be taken against any individual for raising concerns as regards this policy. However, any such reporting by an employee if found to be in bad faith or in a false or frivolous manner will be considered a violation of the code of conduct, and such employee may be subject to disciplinary action.