

Equal Opportunity Policy

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1.0 Introduction

Article 15 and Article 16 of Indian constitution encompasses social safeguard measures for all citizens of India. Article 15 mandates prohibition of discrimination on grounds of religion, race, caste, sex, place of birth or any of them. Article 16 mandates equal opportunity in matters of public employment. Article 16(2) further states that no citizen shall on grounds only of religion, race, color, caste, sex, descent, place of birth, residence, or any of them be ineligible for or discriminated against in respect of any employment or office or income earning opportunity.

ELANTAS Beck India Ltd. is committed to promoting equal employment opportunities and a workplace that is free of all forms of discrimination as regards to language, race, religion, sex, color, caste, creed, age, ethnic origin, marital status, sexual orientation, gender identity, or any other category protected by law. Equal opportunity means that every employee experiences fairness, impartiality, and equal access to all career initiatives at our organization. Our commitment to equal opportunity promotes an inclusive work environment that values and accepts the diverse cultural and social backgrounds of its employees. For the purpose of this Policy an employee means any employee whether permanent or temporary including permanent or temporary worker.

2.0 Scope and Applicability

This policy is applicable to all employees of ELANTAS Beck India Ltd.

3.0 Policy Objective

The objective of this Equal Employment Opportunity (EEO) Policy is to ensure that:

- ELANTAS Beck's employees or potential employees do not suffer unfair discrimination in the workplace.
- Individuals and groups within the company 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, social and recreational programs will be administered on a non-discriminatory basis.
- Application of labour laws to be uniformly applied in the organization.

4.0 Equal Employment Opportunity and Provisions of Services

It refers to the principle which ensures that all employees and potential employees of ELANTAS Beck India Ltd. are treated equitably and regardless of their language, race, religion, sex, color, caste, creed, age, ethnic origin, marital status, sexual orientation, or gender identity. Everyone has an equal chance when applying for jobs, Internal Job Postings, transfers, promotions and training opportunities. The following activities shall be conducted in a uniform manner-

- 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

5.0 Promoting Inclusive Environment for Physically Challenged Individuals:

- We shall ensure no employee is discriminated on the grounds of physical disabilities or any medical conditions of any nature whatsoever which can be current existing or arising in future.
- We shall not disclose any information shared by an employee on account of nature/type of disability/medical condition and it will remain confidential so far as disclosure of such information is not mandated by any law.
- We shall make reasonable arrangements to ensure equal opportunity in the application and selection process; to enable an employee with a disability to perform the essential functions of a job; and to enable an employee with disability to enjoy the same benefits and privileges of employment as non-disabled employees.
- We shall promote building workplaces accessible for people with disabilities (PWD) to support and facilitate to perform their duties effectively.
- We shall provide required facilities and amenities to persons with disabilities to enable them to effectively discharge their duties.
- We shall not deny promotion to a person merely on the ground of disability.

If an employee acquires any disability in the course of employment and is not suitable for the post s/he was holding, shall be shifted to some other position with the appropriate pay scale and service benefits revision.

6.0 Complaint process and procedures

A person wishing to make a complaint of not receiving equal employment opportunity can consult and file a complaint with the Head - HR. The complaint should be made in writing within 5 working days of any such incident of discrimination.

The constitution of the Committee shall be-

- Managing Director (Chairman of the Committee)
- Legal Department Head
- HR Department Head

Once a complaint has been filed, an investigation will be undertaken immediately. In instances where there is an alleged respondent, the respondent will be notified immediately. The complainant and the respondent will both be interviewed along with any individuals who may be able to provide relevant information. All complaints will be investigated in the same manner with the aim of promoting, fairness and equality.

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

7.0 Timelines

ELANTAS Beck India Ltd. 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 30 working days from the date of filing of the complaint.

8.0 Special Circumstance and Exception

No exception to this policy is allowed. Any Deviation to this policy must be approved by the Managing Director.

9.0 Review of the policy

This policy shall be reviewed at periodic interval as may be warranted for its suitability and updated as necessary.

10.0 Non-compliance and Consequence

Any instance of discrimination or favoritism with proper evidence that comes 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/ Code of Conduct of the company.

This Policy has been approved by the Board of Directors of ELANTAS Beck India Limited on 20th January, 2023 and is effective from this date.