

## Section 1-Compliances

### Equal Opportunity Policy

#### Background

The Equal Opportunity Policy (“**EO Policy**”) applies to all employees permanent and fixed term on rolls of Escorts Kubota Limited (together with its subsidiaries, “**Escorts Kubota Limited**” or the “**Organization**”) and shall be consistently applicable throughout their period of employment. Additionally, this EO policy is subject to the provisions of applicable laws, including Rights of Persons with Disabilities Act, 2016, Transgender Persons (Protection of Rights) Act, 2019 and Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Act, 2017.

The EO Policy is divided into 4 (four) parts –(i) Part A sets out the Organization’s commitment towards persons with disabilities as per the Rights of Persons with Disabilities Act, 2016; (ii) Part B sets out the Organization’s commitment towards creating an inclusive, safe and fair workplace for all its personnel (including transgender persons) as per the Transgender Persons (Protection of Rights) Act, 2019; (iii) Part C sets out the Organization’s commitment towards creating equal opportunity for employees with HIV/AIDS as per the Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Act, 2017; and (iv) Part D contains general provisions that apply to Parts A, B and C.

At Escorts Kubota Limited , we are committed to promote equal employment opportunities and a workplace that is free from all forms of harassment and discrimination. Equal opportunity means that all employees experience fairness, impartiality, and equal access to all career initiatives. Escorts Kubota consciously works towards creating an inclusive work environment that values and accepts the diverse cultural and social backgrounds of its employees.

#### Objective

Escorts Kubota Limited believes in providing equal employment opportunities without any discrimination on the grounds of *inter alia* age, colour, origin, caste, nationality, disability, marital status, religion, ethnicity, race, gender, gender identity, gender expression, sexual orientation or any other form of discrimination, whether barred by law, or otherwise. The organization strives to create and maintain a work environment that is free from any kind of harassment or victimization based on above considerations.

#### Our Responsibility

- All employees are responsible for treating each other with respect and dignity, which includes respecting the rights and differences of others.
- We encourage different groups of persons to join the Organization. Employment, professional development, and promotion opportunities with Escorts Kubota Limited are based solely on one’s merit, qualification and performance and the requirements of the business. It is not based on any unrelated attributes or characteristics that an individual may possess (such as disability, gender identity, etc.).
- Subject to applicable laws, Escorts Kubota Limited does not make any discrimination in matters of payment of salary, recruitment, or any other service condition (such as promotion, transfer, training, etc.) for performing the same work or work of similar nature, only on the basis of gender of the individuals.

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#### **PART A – Equal Opportunity for Persons with Disabilities**

##### **1. LEGAL FRAMEWORK**

The Rights of Persons with Disabilities Act, 2016, read with the Rights of Persons with Disabilities Rules, 2017 (collectively “**Disability Act**”), places certain duties and responsibilities on employers to promote equality of opportunity and non-discrimination against persons with disabilities.

##### **2. RECRUITMENT AND DEVELOPMENT**

- 2.1 The Organization is open to engage people with disabilities, provided it meets the job requirements for respective roles. The Organization strives to recruit, train, develop, and retain persons with disabilities, and towards this end, has appointed a liaison officer, who may be contacted at [grievance@escortskubota.com](mailto:grievance@escortskubota.com), to oversee the provision of facilities and amenities for such employees.
- 2.2 The Organization monitors self-declaration of disability at the application as well as appointment stage and during the term of employment. The Organization may at any time require an employee to provide proof of disability, including obtaining the necessary certification issued by the government under the Disability Act and other applicable laws.
- 2.3 The manner of employment of persons with disabilities will be completely based on merits and will be the same as the process prescribed for the employment of persons without disabilities, subject to applicable law.
- 2.4 The Organization will, upon receiving a request in this regard and as per business requirements, at its discretion and on a case-to-case basis, consider such employees’ request with respect to transfer, posting, and any other facilities. No actions of the Organization in this regard, will be considered a precedent for any future requests for special consideration from any employee with disabilities.
- 2.5 Managers who conduct the annual review of their staff will pay attention to the developmental needs of disabled employees together with discussing any reasonable adjustments which may be identified.

##### **3. ACCESS TO WORK**

3.1 The Organization will make every reasonable effort to ensure that all parts of the Organization’s office space are accessible to persons with disabilities. The Organization will use its best efforts to make appropriate official programs, training, and events reasonably accessible to individuals with disabilities. Some of the specific measures that the organization shall endeavor to put in place are as follows:

- Adequate and well-illuminated spaces, with access to elevators, where relevant, allocated to persons using mobility devices such as wheelchairs, walkers etc. as well as those walking with the assistance of other persons.
- signage within the workplace which is visible and legible to all employees.
- conveniently located unisex washrooms that are accessible to persons with disabilities.
- access to ramps, elevators etc. to persons with disabilities.
- resting facilities within the workplace, especially in parts where the persons with disabilities are required to cover large distances.
- waiting areas, canteens, and other facilities accessible to persons with disabilities.
- reserved parking to persons with disabilities at a convenient distance from the workplace building.
- Handrails wherever necessary.
- drinking water units/fountains accessible to employees with disabilities; and
- emergency evacuation system for all employees, including persons with disabilities, in case of an emergency (e.g., fire).

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The organization is also committed to taking reasonable measures to support the accessibility of its digital resources.

To the extent possible and relevant, the Organization will extend the aforesaid facilities to visitors as well, especially if the Organization has been provided with prior notice of the visit.

#### 4. REASONABLE ADJUSTMENTS

- 4.1 The Organization will make reasonable adjustments (on best efforts basis) when a disabled employee may be placed at a substantial disadvantage in comparison with a person who is not disabled. Reasonable adjustments for employees include making appropriate arrangements in relation to workplace, training, business trips, and office events, among others.
- 4.2 Adjustments may include reallocation of duties, working hours, modifying equipment, consideration for other roles, provision of additional support to carry out official duties. The Organization will make the afore mentioned adjustments at its discretion keeping in mind the business needs and on case-to-case basis. No actions of the Organization in this regard, will be considered a precedent for any future requests from any employee with disabilities and the same cannot be claimed as right.
- 4.3 All training sessions, seminars, etc. to be attended by employees are normally held in accessible venues with consideration of the needs of employees with disabilities, which may include (if needed) providing handouts with larger prints or which are differently coloured for those with visual impairments. The Organization shall provide all relevant trainings to employees with disabilities whenever deemed necessary.
- 4.4 The Organization shall not compel any person with disability to pay the costs (whether in whole or in part) which it incurred for providing any reasonable adjustment made by the Organization in relation to employees with disability.
- 4.5 Special Leave: Upon exhausting regular leave benefits, employees with disabilities may request for extra leave on account of their disability and the Organization will evaluate such request accordingly. An employee's request for such extra special leave will be treated as a request for reasonable accommodation and will be evaluated accordingly on a case-to-case basis. The special leave entitlement in this regard will not exceed [5 (five) days] of leave per year as per leave cycle.

## PART B – Equal Opportunity for Transgender Persons

#### 5. THE LEGAL FRAMEWORK

The Transgender Persons (Protection of Rights) Act, 2019, read with the Transgender Persons (Protection of Rights) Rules, 2020 (collectively "TP Act"), provides for protection of rights of transgender persons and their welfare.

#### 6. EQUAL OPPORTUNITY

- 6.1 The Organization strives to create a diverse environment and gives paramount importance to the skill set of an individual. Positions based on vacancies are open to all individuals on merit basis irrespective of their gender identity.
- 6.2 In accordance with the provisions of the TP Act, the Organization will make reasonable endeavours to build processes and systems to ensure:
  - that appropriate facilities and measures for providing a safe working environment to transgender persons are implemented;
  - that every kind of discrimination, without a reasonable cause, is prohibited against transgender persons,

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including but not limited to matters relating to employment, recruitment, promotion, and other related issues;

- that no transgender person is given unfair treatment at the workplace. The terms and conditions of their employment will be similar to other employees of the Organization; and
  - that a grievance redressal mechanism for addressing the matters related to the transgender persons is available.
- 6.3 Subject to the TP Act, every transgender person shall have a right to self-perceived gender identity. Subject to compliance with the applicable laws, the Organization may at any time require any personnel to provide the certificate of identity issued by the government, obtained by such transgender personnel under the TP Act, if necessary, for internal processes and policies of the Organization.

## 7. FACILITIES AND AMENITIES

- 7.1 In accordance with the TP Act, the Organization will make every reasonable effort to ensure that all parts and facilities of the Organization's office space are safe and gender neutral. Some of the specific facilities and amenities that the Organization shall endeavour to put in place, are as follows:
- addition of unisex (gender neutral) restrooms at the establishments. Separately, the employees may be allowed to access any restroom consistent with their asserted gender identity. Wherever possible, the Organization will strive to make available single stall restrooms for increased safety and privacy of transgender persons, if needed.
  - provide hygiene products at all unisex restrooms, which may include (if feasible) any product specifically requested by transgender employees;
  - ensure that any form of violence is not perpetrated against any of the employees, including transgender employees, by providing adequate security guards on the premises;
  - ensure safety by installing CCTV cameras at common places within the establishment.

## **PART C – Equal Opportunity for Persons With HIV/AIDS**

8. The Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Act, 2017 read along with the Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Rules, 2018 (collectively, "**HIV Act**") provide for the protection of human rights of persons affected by Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome ("**HIV/AIDS**").
9. The Organization shall take every reasonable action (on a best effort basis) to create a safe working environment and sensitize its employees regarding the provisions of the HIV Act through awareness programs. The following shall be ensured towards achieving these aims:
- That there is no discrimination (in matters of employment, promotion, etc.) or stigmatization of employees on the basis of real or perceived HIV/AIDS status;
  - That subject to applicable laws, neither will HIV/AIDS screening be required from job applicants, nor will they be asked to disclose HIV/AIDS related personal information and their health-related information during any recruitment process;
  - That asking employees to disclose HIV/AIDS related personal information is prohibited and no co-workers will be obliged to reveal personal information about fellow worker(s);
  - That any employee who is found to be discriminating or harassing any employee who has been tested positive for HIV/AIDS or lives with a person who is diagnosed with HIV/AIDS, in any manner at the workplace will attract disciplinary action

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**10. APPOINTMENT OF GRIEVANCE REDRESSAL COMMITTEE**

10.1 All grievances and complaints under the EO Policy will be addressed on priority basis and shall be taken seriously and treated with sensitivity and fairness.

- The Organization has designated a Grievance Redressal Committee (“GRC”) for addressing any complaint of violation of the TP Act, the HIV Act and discrimination on the basis of disability. Any complaint in writing regarding any of the above can be registered on [grievance@escortskubota.com](mailto:grievance@escortskubota.com) and / or through the employee’s immediate supervisor. Alternatively, an employee may contact the Human Resources Department for such details.
- Any complaint regarding the EO policy must be made within a period of 3 (three) months from the date, the complainant must be aware of the alleged violation under the concerned Act. This time period could be extended by the GRC by a further period of 3 (three) months, for reasons to be recorded in writing.
- On receipt of the complaint, GRC shall enquire into such complaint within 7 (seven) days in case of violations in relation to part C of this EO Policy (i.e., for complaints under the HIV/AIDS Act) and within a period of 15 (fifteen) days from the date of receipt of any other complaint in relation to Part A & B of this EO Policy (i.e. for complaints under Disability Act & TP Act). On completion of the enquiry, the GRC shall submit an enquiry report to Chief Officer – HR & GA.
- Chief Officer-HR & GA shall take an action within 15 (fifteen) days from the date of receipt of such report.
- An aggrieved individual can forward the complaint to Chief Officer-HR & GA in case no action is taken by the GRC within prescribed time limit mentioned in the policy. The Chief Officer-HR & GA can also take action forthwith in cases where action has not been taken by the GRC in accordance with the applicable laws and this EO Policy.

**Policy Communication**

This EO policy shall be displayed at conspicuous places in the organization and shall be widely disseminated through mails, training sessions and notice boards of the Organization.

**Confidentiality & Non - Retaliation**

All information given to the Organization by employees regarding disabilities, HIV/AIDS status, and gender identity will be treated with respect and confidence and in accordance with the applicable data-protection laws and relevant policies of the Organization.

In any manner whatsoever, Escorts Kubota Limited will not tolerate harassment, discrimination, retaliation or victimization of any employees and applicants, for filing a complaint or assisting in an investigation under this EO Policy as per the applicable law (including, but not limited to, the Disability Act, the HIV Act, and the TP Act).

**Overriding Effect**

Notwithstanding anything contained in this EO Policy, to the extent that there is any inconsistency/discrepancy between this EO Policy and any statute (including the Disability Act, the HIV Act, and the TP Act), the statutory provisions will prevail and supersede this EO Policy. Further, any matter related to this EO Policy if not covered herein will be dealt in the manner prescribed under the applicable laws (including the Disability Act, the HIV Act, and TP Act).

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