

Equal Opportunity Policy for Person with Disabilities

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DILIP BUILDCON LIMITED
INFRASTRUCTURE & BEYOND

DILIP BUILDCON LIMITED

Equal Opportunity Policy for Person with Disabilities

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1. Objective

Dilip Buildcon Limited, as a proactive organization fully recognizes its socio-economic obligations towards its employees in general and public at large and therefore, we recognize the value of a diverse workforce. We are committed to providing equal opportunities in employment and fostering an inclusive workplace where all employees are treated with respect and dignity.

At Dilip Buildcon Limited, workforce diversity is a business imperative. We strive to ensure that our workforce is representative of all sections of the society. We believe that, by doing so, we would be better equipped to deliver the best solution of growth, provide complete transparency to the Dilip Buildcon Limited stakeholders and broaden activity base and leave a positive social imprint.

Dilip Buildcon Limited is committed to promoting awareness on equal opportunity and inclusion of people with disabilities among all employees by organizing training and sensitization programmes and campaigns.

This Equal Opportunity Policy is in accordance with the provisions of **The Rights of Persons with Disabilities Act, 2016** and **The Rights of Persons with Disabilities Rules 2017**. We undertake to abide by the principles of the Policy in letter and in spirit.

2. Scope:

Policy covers all employees with disabilities in Dilip Buildcon Limited along with job applicants, full-time/part-time employees, interns/trainees, contractual employees, including temporary employees. It also covers those employees who acquire disability during the course of employment.

The Policy applies to all aspects of employment, including recruitment, training, working conditions, transfers, employee benefits and career advancement.

3. Applicability:

This policy is applicable to Dilip Buildcon Limited (DBL) and its Subsidiary Companies.

4. Policy Statement

Dilip Buildcon Limited is committed to eliminating all forms of unlawful discrimination (which includes direct discrimination, indirect discrimination and denial of reasonable opportunities), bullying and any action that is in the nature of detrimentally affecting employees with disabilities.

The Company continuously strive to ensure that all its facilities, technologies, information and infra, privileges are accessible to employees with disabilities without any discrimination.

The decisions on employment, career progression, training or any other benefits are solely based on merit. We follow an inclusive evaluation process by ensuring that a person with disability is afforded, suitable flexibility and accommodation that may be required so that she/he may be evaluated fairly.

If an employee acquires a disability during the course of his/her employment, she/he can return to work at the same rank as before. In case the employee is incapacitated from performing the current job, the organization will undertake to re-skill the employee for another appropriate / suitable position at the same rank or higher in the same function or similar.

5. The Definitions for the purpose of this Policy are in tune with The Rights of Person with Disabilities (RPWD) Act as under:

- a) **“Person with Disability”** means a person with long-term physical, mental, intellectual, or sensory impairment which, in interaction with barriers, hinders his/her full and effective participation in society equally with others.
- b) **“Person with Benchmark Disability”** means a person with not less than forty percent of a specified disability where specified disability has not been defined in measurable terms. It also includes a person with disability where specified disability has been defined in measurable terms by a certifying authority.
- c) **“High support”** means an intensive support, physical, psychological and otherwise, which may be required by a person with benchmark disability for daily activities, to take independent and informed decision to access facilities and participating in all areas of life including education, employment, family and community life and treatment and therapy.
- d) **“Discrimination”** in relation to disability, means any distinction, exclusion, 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.
- e) **“Reasonable accommodation”** means necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden in a particular case, to ensure persons with disabilities enjoy or exercise equal rights as others.
- f) **The “Specified Disabilities” are the disability categories mentioned in the Schedule – Clause (zc) of Section 2 of the Act are as under:**

I. Physical Disability-

- (A) Locomotor disability
 - a) Leprosy cured Person.
 - b) Cerebral Palsy
 - c) Dwarfism
 - d) Muscular dystrophy
 - e) Acid attack Victim
- (B) Visual Impairment
 - a) Blindness
 - b) Low vision
- (C) Hearing Impairment
 - a) Deaf

b) Hard of Hearing

(D) Speech and Language disability

II. Intellectual Disability-

- a) Specific Learning Disability
- b) Autism Spectrum Disorder

III. Mental Behaviour / Mental Illness as prescribed in the Act.

IV. Disability caused due to-

- a) Chronic Neurological Conditions like “multiple sclerosis”, “parkinson’s disease”
- b) Blood Disorder such as “haemophilia”, “thalassemia”, “sickle cell disease”

V. **Multiple Disabilities (More than one of the above specified disabilities)** including deaf blindness which means a condition in which a person may have combination of hearing and visual impairments causing severe communication, developmental, and educational problems.

VI. Any other category as may be notified by the Central Government

6. Policy Details:

Facilities and amenities

• **Physical Infrastructure-** The organization will ensure suitable tangible facilities and infrastructure are provided to employees with disabilities to enable them to effectively discharge their duties in the establishment.

The Company aims to ensure that its physical infrastructure (buildings, furniture, facilities and services in the building/campus) adheres to the accessibility standards given in the Harmonized Guidelines and Space Standards for Barrier Free Built Environment for Persons with Disabilities and Elderly Persons, 2016 and the National Building Code, 2016. The organization also aims to revamp its existing buildings within reasonable period of time as per requirements to ensure strict compliance with the Standards.

Any new facility that is built, renovated, leased or rented will be evaluated for compliance with accessibility standards at different stages of the building construction. Reasonable steps and measures will be taken to incorporate aforementioned guidelines in construction of new facility. Preference shall be accorded to leasing the property that are compliant with the above-mentioned policy. Any employee facing accessibility issues should report at their location or write to the concerned facilities HR & Admin / Liaison Manager.

• **Reasonable Accommodation** -Dilip Buildcon Limited will make reasonable accommodations, whenever necessary, for qualified employees or job applicants who have disabilities, as per The RPWD Act.

Such accommodation would be provided:

- 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 a disability to enjoy the same benefits and privileges of employment as non-disabled employees.

Examples of reasonable accommodations may include (but not limited to) acquiring or modifying equipment or devices, modifying assessment and training materials, modifying work schedules, reassignment to a vacant position, taking extra leave for a reason related to her/his disability.

All documents concerning an employee's reasonable accommodations request would be maintained in the employee's confidential file, separate from the employee's official personnel file.

List of positions identified - The hiring is purely based on merit and candidates are evaluated based on their skills and competence. Suitability and conduciveness of KRAs shall be made congruent to accommodate PWD for any specific position. A suitable candidate shall be accommodated in similar or corresponding position that is more conducive.

Manner of selection-

- Vacancy advertisement and application

All positions are open to people with all types of disabilities and are published on Dilip Buildcon Limited career site, social media and job portals.

Our key focus is to:

- Ensure that all our existing sourcing channels and methods are inclusive.
- Collaborate with disability organizations to attract suitable talent.

• **Selection Process** - The selection process is the same for all candidates, including persons with disability. Flexibility and accommodations will be provided to job applicants with disabilities as required. Job applicants who need specific adjustment / accommodation in the selection process can contact the HR Recruiter or the Liaison Manager.

Other facilities-

- Training and Career development
- **Travel, stay and transport** - For official travel (local, outstation), employees with disabilities will be provided reasonable accommodation or sanction additional costs to cover expenses such as door pick-up and drop, low floor cabs, air travel (in case road/train travel is inaccessible), accessible guest houses and hotels (where available) and allowing a personal attendant to travel alongside if required, as per our reasonable accommodation guidelines.
- **Employee engagement and social inclusion** - Dilip Buildcon Limited will endeavor to make all company events and meetings inclusive by ensuring that these are conducted at accessible venues with a provision of reasonable accommodation being available to employees with disabilities.

7. **Governance / Reporting Mechanism and Monitoring of Implementation** - Dilip Buildcon Limited has constituted Accessibility Inclusion Committee to promote and strengthen the company's charter to create an inclusive workplace for employees with disabilities.

The objectives and the functions of the Committee are:

- To ensure compliance with the applicable provisions mandated for private establishments under The Rights of Persons with Disabilities (RPWD) Act, 2016.
- To plan and allocate budget for driving the persons with disability charter efficiently.
- To oversee the effective implementation of the company's equal opportunity policy.

The Committee will meet annually to review the progress made and decide the action plan for the next year.

• **HR & Admin Manager / Liaison Manager** - Dilip Buildcon Limited has appointed the HR & Admin Manager / Liaison Manager at Corporate Office and Project Locations for persons with disabilities as per the mandate of the applicable Rules under the RPWD Act. He will coordinate with the various concerned departments and provide subject matter expertise to implement the plan prepared by the Committee. He will also be responsible for ensuring that employees and job applicants with disabilities receive the needed reasonable accommodation for performing their job and participating in the selection process on an equal basis with others. He will also raise awareness among all employees in the company to create an inclusive work environment. He will present a progress report to the Committee annually.

• **HR & Admin Managers** - Human Resource Managers at the respective project locations and the Corporate Office have the functional responsibility for ensuring compliance with the provisions of this policy. They should proactively take steps to ensure that all employees are sensitized and there is no discrimination in recruitment, training, career development and other aspects of employment.

It is the responsibility of each and every employee at Dilip Buildcon Limited to create an environment that is non-discriminating and inclusive. Sensitivity training programmes to orient all employees, distribution of literature and awareness week shall be undertaken every year to sensitize the employees.

8. Maintenance of Records

Dilip Buildcon Limited has a robust and well-defined process for capturing and maintaining the records of its employees. Dilip Buildcon Limited understands and respects that sharing information about one's disability is purely a personal preference, and nobody is mandated to do so. Employees who have a disability or medical condition and wish to share the information can fill the Voluntary Self-Identification to disclose their disability status at the time of their recruitment and subsequently during the course of employment. Also, given that disability or medical ailment can be acquired at any point, an employee can edit the information in the form any time.

Employees who are citizens of India can upload the disability certificate issued by Government of India, which would help them avail Government benefits like income tax exemptions.

Access to the data is given only to the Head-HR. Confidentiality of the data will be maintained with certain exceptions like data being made available for security and other relevant functions for ensuring reasonable accommodations. The information will be shared on need basis, on the discretion of the Head-HR. The stakeholders other than Head-HR who are given access to the information after approval, shall be required to ensure confidentiality.

9. Grievance Redressal

Dilip Buildcon Limited has a well-defined grievance to enable its employees and others associated with the company to not overlook any concern but instead raise it at early stage in the right manner, without fear of retaliation,

victimization, subsequent discrimination or disadvantage at the workplace. Dilip Buildcon Limited does not tolerate any malpractice, impropriety, abuse or wrongdoing or discrimination or harassment and encourages its employees to raise their concerns.

The organization ensures that such concerns would be thoroughly inquired by the designated persons independently and fairly. While the company considers the malpractices or wrongdoing or abuse or harassments in general, it is also conscious of the likelihood of any direct or indirect discrimination or denial of reasonable accommodation or bullying behaviour towards employees with disability and would treat such instances also, as malpractice, abuse or harassment or discrimination, as the case may be.

The organization will follow the same procedure for inquiring and investigating the complaints or concerns raised by employees with disability. As it follows under the Grievance Redressal mechanism applicable in the organization, with increase of level of sensitivity and privacy. However, necessary reasonable accommodation will be provided to employees with disabilities to effectively participate in the investigation process. For example, sign language interpreter for persons with deafness, accessible venue for persons with locomotor disability, etc.

For complaints related to or raised by an employee with disability, the Grievance Redressal Officer will be consulted and involved by the Grievance Team to conduct the investigation.

Employees can reach out to their HR manager / Reporting Manager to voice their concerns. In case the issue is still not resolved, they can raise a formal complaint under the Grievance Redressal Mechanism through the designated officer under this policy.

If an employee raises a concern, she/he will not be under any risk in the form of retribution or retaliation. The company will not tolerate any harassment or victimization (informal pressures) against any employees raising concerns who have a genuine case and will take appropriate action accordingly.

10. Policy Amendment

The right to interpret/amend/modify this Policy vests in the Board of Directors of the Company.

11. Policy version: Current version: 1.0