



PREVENTION OF WORKPLACE DISCRIMINATION & EQUAL EMPLOYMENT OPPORTUNITY

OBJECTIVE

To define policy prohibiting workplace discrimination, protecting human rights and promoting equal employment opportunities.

SCOPE

This policy covers all permanent employees across Neuland Group.

POLICY

A. Freely Chosen Employment

- a) The Company shall not engage directly or indirectly, forced or compulsory labour, including prison labour, and shall not require applicants to pay 'deposits' to Neuland upon commencing employment.
- b) Neither the Company nor any entity supplying labour to the Company shall withhold any part of any employee's salary, benefits, property or documents to force such employees to continue working for the organization.
- c) The Company shall ensure that no employment fees or costs are borne in whole or in part by the employees.
- d) Employees are free to leave the Company as per the terms of employment mentioned in their appointment letter.

B. Equal Employment Opportunities & Prevention of Workplace Discrimination

- a) Everyone has an equal chance when applying for internal job postings, training opportunities or promotions. Employees will be treated equitably and fairly, regardless of their gender or disability.
- b) The Company shall not discriminate directly or indirectly, in hiring, remuneration, access to training, promotion, termination or retirement based on race, national or territorial or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political opinions, age or any other condition that could give rise to discrimination.
- c) Employees too shall not be discriminated at their workplace on the aforementioned status.
- d) Capabilities, merits, sincerity, commitments and work performance are the only factors that shall be considered for all decisions about career opportunities and growth for any employee.
- e) Decisions about HR issues - promotions, compensation, benefits, transfers, termination, sponsorship for training programs, attending conferences, terms of employment, etc. will always be taken impartially.
- f) Employees are encouraged to take positive action towards promoting equal opportunity throughout the organization.

C. The Company shall treat all employees with dignity and respect. The Company shall not engage in or tolerate the use of corporal punishment, monetary fine, mental/ physical coercion or verbal abuse of employees. No harsh or inhumane treatment is allowed.

D. The Company shall not subject applicants/ employees to pregnancy or virginity tests under any circumstances.

E. Intimidation & Discrimination

- a) Intimidation & Discrimination refers to someone not being treated fairly because of a certain attribute. Discriminatory behavior may be such as:
 - i. Conduct that can be considered harassing, coercive or disruptive, including sexual harassment
 - ii. Making offensive 'comments or remarks' about another worker's clan, ethnic background, skin complexion, sex or disability
 - iii. Judging someone on their political or religious beliefs rather than their work performance
 - iv. Making uncalled for negative remarks on one's status-parental, economic, residential, marital, gender; Age, Physical features; spiritual, traditional or customary beliefs; and/or looks, baldness, walking style, habit of stammering, physical disability or impairment, sexual orientation, medical record (HIV +) etc.
- b) The Company shall not allow any behavior that is threatening, abusive, exploitative or sexually coercive, including gestures, language and physical contact, in the workplace.
- c) Employees shall be treated fairly at all times.

F. Sexual Harassment

Please refer Neuland's policy on Prevention, Prohibition and Redressal of Sexual Harassment.

G. Management And Staff Responsibility

- a) All managers have a key responsibility in establishing and maintaining a workplace free from personal discrimination/harassment.
- b) All managers are directly responsible for the conduct of their team members.
- c) All employees are expected to comply with this policy and it is the personal responsibility of each employee to ensure that inappropriate conduct does not occur.

H. How To Lodge A Complaint

- a) Any complaints of discrimination will be investigated promptly, and appropriate disciplinary action will be taken to eliminate inappropriate behaviour. Creating a discrimination-free work environment is every employee's responsibility.
- b) If an employee believes that she/ he has been a victim of discrimination, while on Company business, she/ he must immediately file a written complaint to their Location HR. If the employee wishes to go anonymous, s/he has an option to submit their grievance in the appropriate drop box made available in each of the company locations.

I. How Complaints Will Be Dealt With

- a) Any complaints of discrimination will be investigated promptly, and appropriate disciplinary action will be taken to eliminate inappropriate behavior.
- b) Creating a discrimination/harassment free work environment is every employee's responsibility. Employees must cooperate fully in such investigations.
- c) All complaints shall be investigated in a fair manner as per applicable laws.

J. Outcomes

- a) The Company will act proactively to ensure that any identified discriminatory practice shall be stopped immediately in case it is established that discrimination has occurred and/or the matter has been resolved successfully through mediation.
- b) Outcomes may include transferring the respondent to another department, changing the respondent's job duties, or a letter of apology.
- c) If warranted, the Company will take appropriate corrective action including termination of employment of the respondent.



- d) Actions taken to remedy the situation should not have any negative effect on the person having lodged the complaint. Conducive working environments shall be ensured at all times.

RESPONSIBILITY

Respective Location HR will be responsible to ensure policy compliance.

EXCEPTIONS

Any exceptions to the policy shall be approved by Chief Human Resources Officer.

REVIEW

Company reserves the right to review, withdraw or modify the policy as and when required, without prior intimation.