

Equal Opportunity Policy



All policies/supplements are subject to local laws of India.
These policies/supplements are subject to change without prior notification.

Purpose

AkzoNobel India ('Company') recognizes that Equal Employment Opportunity is a matter of employment obligation, social justice and legal responsibility. It also recognizes that prohibiting discriminatory policies and procedures is sound management practice.

This Equal Employment Opportunity (henceforth referred to as the 'Policy') has been designed to facilitate the creation of a workplace culture that maximizes organizational performance through employment decisions. These decisions will be based on real business needs without regard to non-relevant criteria or distinctions and will ensure that all decisions relating to employment issues are based on merit.

This Policy is designed to ensure that the Company complies with its obligations under:

- The Rights of Persons with Disabilities Act, 2016 and the Rights of Persons with Disabilities Rules, 2017 (henceforth, collectively referred to as the 'Disability Law')
- The Transgender Persons (Protection of Rights) Act, 2019 and the Transgender Persons (Protection of Rights) Rules, 2020 (henceforth, collectively referred to as the 'Transgender Law')
- The Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Act, 2017 and Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Rules, 2018 (henceforth, collectively referred to as the 'HIV/AIDS Law').

Persons protected from discrimination under these 3 laws would be henceforth referred to as 'Persons Belonging to Protected Categories' in this Policy.

Policy

It is the policy of the Company to provide equal employment opportunities, without any discrimination on the grounds of age, color, disability, marital status, nationality, race, religion, gender, gender identify, sex, sexual orientation, HIV/AIDS or related protected status, etc. The Company strives to maintain a work environment that is free from any harassment based on above considerations. This Policy is subject to applicable regulations, qualifications and merit of the individual.

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It is the endeavor of the Company that this Policy is consistently applied throughout the period of employment of the individual right from the recruitment process till superannuation / exit, whichever is earlier.

This Policy shall cover all persons including any job applicants, FTE/Non-FTE, interns / trainees, as well as those employees who acquire disability or become HIV/AIDS affected (or qualify as 'protected persons' under the HIV/AIDS Act) during their work tenure.

Equal Opportunity Statement

In accordance with the Disability Law, Transgender Law and HIV/AIDS law, it is the Company's responsibility to ensure that the work environment is free from any discrimination against Persons Belonging to Protected Categories. Further, the Company will take all actions to ensure that a conducive environment is provided to Persons Belonging to Protected Categories to enable them to perform and excel in their role.

The Company would ensure a safe working environment, confidentiality and non-discrimination of HIV affected employees if any.

The Company is committed to providing systems and processes to ensure:

- That conducive facilities and amenities are provided to Persons Belonging to Protected Categories to enable them to effectively discharge their duties in the establishment.
- That provision is made for an accessible environment and of availability of assistive devices as required.
- That the designated Liaison/Complaints officer, in coordination with the Talent acquisition team, oversees the provision of required facilities/amenities including the process of recruitment for persons with disabilities & transgenders.
- That a grievance redressal mechanism for addressing matters related to the employment of or discrimination against Persons Belonging to Protected Categories is available.
- That if any grievance does arise and any instance of unlawful discrimination is brought up to the attention of the Liaison / Complaints Officer, the same is dealt with in a fair and equitable manner free from any discrimination, including concerns relating to selection of Person(s) Belonging to the Protected Categories, or training, promotion, appraisals, transfer posting, leave & preference in accommodation allocation etc. to persons with disability.

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- That the Liaison / Complaints Officer is responsible to resolve the filed complaint within 180 days from the date of receipt of the written complaint.
- That the unlawful discriminatory actions if proven, appropriate penal consequences will be decided by the country leadership team in accordance to the report filed by Liaison / Complaints Officer.
- That no opportunity is denied to Persons Belonging to Protected Categories merely on the ground of their protected characteristics.
- That suitable material will endeavor to include in Company publications, management conferences, and training courses wherever possible.
- That all recruitment literature and employment advertising will indicate that the Company is an Equal Opportunity Employer.
- That for HIV affected employees, the Company would endeavor to provide appropriate medical management to the extent possible.

Facilities and Amenities for Persons with Disabilities and Transgenders:

(a) Physical Infrastructure: The Company aims to ensure that its physical infrastructure (buildings, furniture, facilities and services in the building/campus and transportation) adheres to the accessibility standards as prescribed by the applicable laws and requirements of the persons with disabilities and transgenders. Any employee facing accessibility issues should report to the Liaison/Complaints Officer.

(b) Digital Infrastructure: The Company strives to ensure that all our documents, communication and information technology systems adhere to the accessibility standards. Any employee facing accessibility challenges can reach [local IT support team] or write to the Liaison/Complaints Officer.

(c) Reasonable Accommodation: The Company will make reasonable accommodations, whenever necessary, for qualified employees or job applicants, as per the applicable laws. Examples of reasonable accommodation may include (but are not limited to) acquiring or modifying equipment or devices, providing ergonomic work stations, providing technologies to assist blind or hearing-impaired individuals, providing flexible or remote working arrangements, modifying assessment and training materials, modifying work schedules, and reassignment to a vacant position. Employees or job applicants who require an accommodation should contact the respective Liaison Officer for providing the details of their requirements.

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(d) Travel, Stay and Transport: For business travel, employees will be provided safe and accessible modes of transport, guest houses and hotels. An employee can place a written/email request for this with the respective Liaison/Complaints Officer.

List of Positions Identified

In the Company, all positions are open for Persons Belonging to Protected Categories. The hiring is purely based on merit and the candidates are evaluated based upon their skill and competence.

Manner of Selection

Wherever possible, all vacancies will be advertised internally as well as externally. Selection criteria (job description and employee specification) will be kept under constant review to ensure that they are non-discriminatory and that they relate purely to the skills needed for the job and nothing else. Application forms will be made available in alternate formats, based on request.

Appointment of Liaison/Complaints Officer and Filing of Complaints

The Company commits that employees and applicants will be protected from coercion, intimidation, interference, discrimination or retaliation for filing a complaint or assisting in an investigation under the Act or the Rules.

As per the applicable law, the Company has appointed the Ms. Harshi Rastogi, Company Secretary & Compliance Officer, as the a Liaison/Complaints Officer who will be responsible for taking initiative and providing the requisite support needed to realize the goals of an inclusive and accessible workplace and reasonable accommodation.

The Liaison / Complaints Officer is responsible for:

- [a) Ensuring a disabled friendly workplace;
- b) Ensuring that all employees are aware of this Policy and know their duties and rights in relation to the Policy; and
- c) Developing proactive strategies to prevent discrimination and harassment at the workplace.

Any questions relating to this policy and/or complaints can be filed with the Liaison / Complaints Officer by emailing at harshi.rastogi@akzonobel.com or submitting a written complaint in person to her.

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Special Leave

If employees need any additional leaves for a reason related to their disability, they should make an application to the manager and the request will be evaluated based on the reasons and other relevant considerations.

Training and Career Development

The Company will endeavour to provide course materials meant for orientation and training in accessible formats on request. Any requests for reasonable accommodation, such as assistive aids, accessible training venue, accessible materials, interpreter etc. should be submitted at least one week before the scheduled date of the orientation/training.

If employees acquire disability during their work tenure, the Company will endeavor to extend appropriate support including assistance to overcome the disability (medical support - as possible), extending possible assistance to seek alternate roles/jobs within the organization as possible.

Disability Questionnaire

The Company is required by the Disability Law to keep records of its employees with disabilities. Therefore, all employees will be asked to fill a survey in order to give information regarding any disability that they may have. There would be an e-mail communication circulated along with the survey, to ensure compliance with the law. Employees can edit the information at any time during their tenure of work with the Company. Employees who acquire disability can also edit and update the answer(s).

Providing any such information about one's disability is strictly voluntary, and refusal to provide information will not subject an employee or applicant to any adverse treatment.

Confidentiality

All employees and applicants have the right to disclose their gender, gender identity, disability status, HIV/AIDS status, etc. or keep such information private. Any employee desiring to change their name, gender or disability status or any information relating to their medical health in the official records of the Company can send their request to the Liaison/Complaints Officer. All information collected by the Company from Persons Belonging to Protected Categories and others in relation to their protected characteristics will be kept confidential, and will be used in accordance with applicable laws and subject to applicable law and/or the following exceptions:

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- Managers/Supervisors/HR advisor may be given information about an employee's disability for allowing/providing any accommodations.
- Security personnel may be given information about an employee's disability to facilitate obtaining any necessary support during an emergency.
- Government officials who are investigating the compliance with applicable law may be given information about an employee's disability.

This Policy will be available to all employees via all the normal communication vehicles within the business.