

EQUAL OPPORTUNITY POLICY

Sonepar India

Version 02

Classification - Restricted

Created by	Checked by	Approved by	Effective date
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REVISIONS HISTORY						
Date	Created by	Checked by	Approved by	Effective date	Version	Revision Details
06 Jan 2020	Debanshu Dutta	Seema Ahluwalia	Seema Ahluwalia	06 Jan 2020	00	Initial Issue
02 Jan 2022	Sangeeta Mazumder	Debanshu Dutta	Seema Ahluwalia	02 Jan 2022	01	The Grievance Redressal Committee must take action within a week.
03 Oct 2022	Sangeeta Mazumder	Debanshu Dutta	Seema Ahluwalia	03 Oct 2022	02	The Committee must take action within date of 15 days from the day of filing Incident Report

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1.Preamble and Overview

At Sonepar India, we recognize the value of a diverse workforce. We are committed to providing equal opportunities in employment and creating an inclusive workplace and work culture in which all employees are treated with respect and dignity.

At Sonepar India, workforce diversity is a business imperative. We will 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 develop and deliver accessible and inclusive products and services. In this way, we hope to be able to meet the needs of our clients and customers better thus producing business excellence. At Sonepar India, we will proactively work towards ensuring that at least 1% of our workforce is comprised of people with benchmark disability and transgender or LGBTQ+, which is a conservative estimate of their representation in the general population.

This Equal Opportunity Policy is in accordance with the provisions of The Rights of Persons with Disabilities Act, 2016. At Sonepar India Pvt. Ltd., we commit to conform not just to the letter but also to the spirit of the Act. To ensure seamless implementation of this policy, Sonepar India has created a strategic plan and modified the related employee policies and processes. The plan has been devised based on advice from Sonepar Group Company as well as through Market Research.

The Human Resource Department has the overall responsibility for the effective operations of the Equal Opportunity Policy. Sonepar India aims to create employment opportunities such that all employees achieve their full potential.

2.Non-Discrimination

We shall not discriminate directly or indirectly against any employee or job applicant on any grounds including on the grounds of age, color, physical ability, ethnic origin, nationality, religion, gender, family status, marital status, pre-natal status, gender re-assignment, or sexual orientation.

3. Policy Statement

At Sonepar India, we are committed towards eliminating all forms of unlawful discrimination (which includes direct discrimination, indirect discrimination and denial of reasonable accommodation), bullying and harassment of people from all communities. We continuously strive to ensure that all our facilities, technologies, information and privileges are accessible to people from all communities.

We encourage candidates with different disabilities, transgender and LGBTQ+ to apply as well. Our 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, transgender and LGBTQ+ is provided with any suitable flexibility and accommodation that may be required so that she/he may be evaluated fairly. Any information shared by employee on disability/medical condition will remain confidential.

If an employee acquires a disability during her/his employment tenure she/he can return to work at the same rank as before. In case the employee is unable to perform the current job, the organization will invest in re-skilling the employee for another position at the same rank or higher. Sonepar India is committed to promoting awareness on equal opportunity and inclusion of people across the organization through various trainings, sensitization programmes and campaigns.

4. Scope

The Policy covers all persons including disabilities and transgender. They could be job applicants, full time/part time employees, interns/trainees, contractual employees, including temporary employees. It also covers those employees who acquire disability during their work tenure. It is the policy of Sonepar India to provide equal employment opportunities, without any discrimination on the grounds of age, colour, disability, marital status, nationality, geography, ethnicity, race, religion, sex, sexual orientation & LGBTQ+. Not unlawfully discriminate because of the Equality Act 2010 protected above mentioned characteristics.

LGBTQ+

The term 'LGBTQ+' is used to denote following sects of people

- **Lesbian:** A lesbian means, a woman who is sexually attracted to a woman.
- **Gay:** A gay means, a man who is sexually attracted to the man.
- **Bisexual:** A bisexual person is someone who is sexually attracted to people of both sexes.
- **Transgender:** It is a term used to define people whose gender identity and gender expression, differs from that usually associated with their birth sex.
- **Queer:** Queer is a term used to refer to sexual and gender identities who are neither heterosexual nor cisgender (opposite of transgender). The term 'Queer' in itself is a community as they generally go for using pronouns instead of being restricted to, He, She etc.

The '+' in 'LGBTQ+' signifies that the above list is not exhaustive it includes other categories as well like Pansexual, asexual, Intersex etc.

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

5. Definitions as per The RPWD Act

- "Person with disability" means a person with long term physical, mental, intellectual or sensory impairment which, in interaction with barriers, hinders his full and effective participation in society equally with others.
- "Person with benchmark disability" means a person with not less than forty per cent of a specified disability where specified disability has not been defined in measurable terms and includes a person with disability where specified disability has been defined in measurable terms, as certified by the certifying authority.
- "Specified disabilities" are the disability categories mentioned in the Schedule of the Act. There is also "any other category", which allows Central Government to add any other disability by issuing a notification.

The disability categories as mentioned in the Schedule are:

- Locomotor disability
- Muscular Dystrophy
- Leprosy cured
- Dwarfism
- Cerebral Palsy
- Acid attack Victim

- Low vision
 - Blindness
 - Deaf
 - Hard of Hearing
 - Speech and Language disability
 - Intellectual Disability
 - Specific Learning Disability
 - Autism Spectrum Disorder
 - Mental illness
 - Chronic Neurological Conditions
 - Multiple sclerosis
 - Parkinson's disease
 - Haemophilia
 - Thalassemia
 - Sickle Cell disease
 - Multiple Disabilities
 - Any other category (as may be notified by the Central Government.)
-
- “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.
 - “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.
 - “Reasonable accommodation” means necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden in a particular case, to ensure to persons with disabilities the enjoyment or exercise of rights equally with others.

6. Policy Details

1. Facilities and amenities

a) Physical Infrastructure

At Sonepar India, we shall aim to ensure that our physical infrastructure (buildings, furniture, facilities and services in the building/campus) adheres to the accessibility Standards given in The Harmonised Guidelines and Space Standards for Barrier Free Built Environment for Persons with Disabilities and Elderly Persons, 2016 and the National Building Code, 2016.

Sonepar India also aims to revamp its existing buildings in future to ensure strict compliance with the Standards. Any new facility that is built or renovated or leased or rented will be evaluated for compliance with accessibility Standards at different stages of the building construction. Any employee facing accessibility issues should report to the facilities team at their location or write to the Liaison Officer.

b) Digital Infrastructure

At Sonepar India shall continuous endeavour to ensure that all our documents, communication and information technology systems adheres to the accessibility standards.

The Standards for Information and Communication Technology as given in the RPWD Rules 2017 are-

- (i). Website Standards: Guidelines for Indian Government Websites (GIGW), as adopted by Department of Administrative Reforms and Public Grievances, Government of India.
- (ii). Documents Standards: Electronic Publication (ePUB) or Optical Character Reader (OCR) based pdf formats.

We will ensure that only accessible technologies are procured. Any employee facing accessibility challenges can reach out to the local IT support team or write to Liaison Officer.

c) Reasonable Accommodation

At Sonepar India Pvt. Ltd. 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:

- 1) to ensure equal opportunity in the application and selection process,
- 2) to enable an employee with a disability to perform the essential functions of a job, and
- 3) 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

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. Sonepar India has formulated Reasonable Accommodation Request Form and Reasonable Accommodation Guidelines in which the process for availing accommodations have been further detailed out.

2. List of positions identified

In Sonepar India Pvt. Ltd., all positions are open for people with all types of disabilities & LGBTQ+. The hiring is purely based on merit and the candidates are evaluated based upon their skills and competence. Flexibility and accommodations will be provided to persons with disabilities on an individual basis as detailed in the subsequent section.

3. Manner of selection

a) Vacancy advertisement and application

- Wherever possible, all vacancies will be advertised internally and externally.
- Wherever possible, vacancies will be notified to colleges, polytechnics and disability organizations.
- All vacancy advertisements will include an appropriate short statement on equal opportunities for people with disabilities.
- 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 and merit based.
- Application forms will be made available in alternate formats, based on request.

b) Selection Process

- For entry level positions up to Manager level, candidates must have a minimum of 10+2+3 years (Degree/Diploma) of education. For Manager level and above, the minimum qualification criterion is to have a post-graduate degree which must be recognized by the University Grants.
- Commission (UGC) or the All India Council for Technical Education (AICTE). This criterion will be relaxed for people with disabilities on a case by case basis as per our reasonable accommodation policy.
- All candidates considered for entry level positions up to the Manager level, must undergo an aptitude test. The test will examine logical reasoning on quantitative parameters and the English language. There is no aptitude test for positions above Manager level. Persons with disability who need exemptions or substitutions or reasonable accommodations for taking the test should contact the Liaison Officer.
- Candidates who clear the aptitude test will be interviewed by a panel comprising of two subject matter experts and one HR Manager. The hiring decision will be

based upon the collective decision of the panel. The subject matter expert should be at least two ranks above in hierarchy from the position for which the interview is being conducted. If a person with disability needs any specific reasonable accommodation for the interview she/he should write to the recruiter or the Liaison Officer.

- Each interviewer is mandated to record her/his comments on the candidate's capability in the Interview Evaluation Form. Reasons for rejection must be objective and not related to the person's disability.
- There is no age limit for applying for any job. However, the candidate must not have more than two years of gap in employment during her/his entire career. For persons with disabilities, this gap could be extended as per our reasonable accommodation policy.
- Wherever possible, more than one person must be involved in the selection interview and recruitment process, and all should have received appropriate training on the topic of equal opportunities for people with disabilities.

4. Other facilities

a) Training and Career development

Sonepar India will endeavor to provide course materials meant for induction and training in accessible formats on request. The request for reasonable accommodation, such as assistive aids, accessible training venue, accessible materials, interpreter, scribe, etc. should be placed at least one week prior to the scheduled date of commencement of induction/training. The company has an accessible and inclusive appraisal process. Any employee/Manager requiring any accommodations for an appraisal process must place a request with the Liaison Officer at least two days in advance.

The establishment conducts yearly training programmes on 'Objective Performance Appraisal Process' for all Managers.

b) Disability Leave

An employee's request for extra leave, for a reason related to her/his disability, will be treated as a request for reasonable accommodation and will be evaluated accordingly.

Sonepar India provides an option of unpaid special leave for a maximum period of three months for employees with disabilities who plan to undergo medical treatment. The procedure for availing the leave is detailed out in the company's Leave Policy.

c) Travel, stay and transport

For official travel (local, outstation and international), employees with disabilities will be provided accessible modes of transport. Air travel (in case road/train travel is inaccessible), accessible guest houses and hotels and allowing a personal attendant to travel along, will be provided, as per our reasonable accommodation guidelines. An employee can place a written request for this with the Travel Officer.

d) Employee Engagement and social inclusion

Sonepar India Pvt. Ltd. will endeavour 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. Equal opportunity for Transgender Persons or LGBTQ+

Sonepar India shall be committed to providing equal employment opportunities in accordance with the provisions of **The Transgender Persons (Protection of Rights) Act, 2019 and Rules thereunder (as may be amended from time to time)** for transgender persons and will take all actions to ensure that a conducive environment is provided to them to perform their role and excel in the same. In furtherance of the same, the Company shall:

- Provide a safe working environment and ensure that no transgender person is discriminated in any matter relating to employment including infrastructure adjustments, recruitment, employment benefits, promotion, career development and training as those afforded to other employees.
- Ensure infrastructural facilities (such as unisex toilets), measures for safety and security (transportation and guards) and amenities (such as hygiene products) to be provided to the transgender persons to effectively discharge their duties; applicability of all rules and regulations of the employer regarding service conditions; and maintenance of confidentiality of the gender identity of the transgender employees.

Transgender persons or persons with disabilities who apply or employees who believe themselves to be covered under The Transgender Persons (Protection of Rights) Act, 2019 or The Rights of Persons with Disabilities Act, 2016 respectively, may contact the Human Resources Representative in any given location. Any information provided is voluntary, will be kept confidential, and will be used in accordance with applicable laws. Refusal to provide information will not subject an employee or applicant to any adverse treatment. Employees and applicants will be protected from coercion, intimidation, interference, discrimination, or retaliation for filing a complaint or assisting in an investigation under the Acts.

Responsibility:

Every employee of Sonepar India is responsible giving effect to this Policy. They must promote and live the values of Equal Opportunity by depicting the respect, care, sensitivity and dignity. Employees need to monitor the work environment to ensure that it is free from discrimination and harassment and encourages inclusion and respect for others.

HR shall appoint a Liaison Officer who shall preferably be a representative of the Management Committee employed at a senior level and in this role will be reporting to the Chief Human Resource Officer of the Company

8. Local Governance Framework

The D&I Leadership Council, Charter of that Council & Human Resource Department is responsible for ensuring that the establishment operates in compliance with The RPWD Act, 2016 and to fulfil the terms of this Policy. The D&I Leadership Council will take a lead in implementing the programme and is responsible for planning, monitoring and reviewing the programme's progress to ensure compliance with the Policy.

1. Diversity & Inclusion Council

Diversity & Inclusion Council comprises of local D&I Champion, D & I Allies, Liasion Officer and representatives of all business units/functions, two electrical representatives (Shall be) from employees with disabilities, LGBTQ+(once recruited) and one external member who has extensive knowledge of disability issues.

The Allies of the D&I Leadership Council responsible for:-

- Collect periodic feedback from various stakeholders on barriers.
- Create an annual action plan based upon the feedback received
- Allocate budget to implement the plan
- Monitor the progress of the plan to ensure that the required targets are met.

A. D & I Champion

Diversity & Inclusion strategic role and guidance to whole as Committee aligned to every gender and community to achieve equality and inclusion.

B. D & I Allies

Diversity & Inclusion Allies comprises of representatives of all business units/functions, who will support in all aspects to D&I Leadership Council. He shall be actively promote and aspire to advance the culture of inclusion through intentional, positive and conscious efforts that benefit people as a whole

The D&I Allies responsible for:-

- Analyse periodic feedback from various stakeholders.
- Take care enough to align himself with a group that may require support to achieve equality and inclusion.

C.Liaison Officer

As per the mandate of The RPWD Act, Sonepar India Pvt. Ltd. will appoint Liaison 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 Officer is responsible for:

- Implementing the action plan for making the workplace and IT systems accessible for people with disabilities by liaising with the various departments in the organization.
- Ensuring that all employees are aware of the Equal Opportunity Policy and knows their duties and rights in relation to the Equal Employment Opportunity policy.
- Developing proactive strategies to prevent discrimination and harassment.

The Liaison Officer along with local or regional HRs' will share the quarterly progress the report to the Executive Director - HR, Admin & IT following that to CEO/MD and the D&I Allies and D&I Leadership Council.

All employees have the responsibility to comply with the Equal Opportunity Policy. Managers and team members need to monitor the work environment to ensure that it is free from discrimination and harassment and encourages inclusion and respect for others.

All employees are encouraged to report any incidents of violation of this policy and Managers should act promptly when concerns arise, or complaints are made.

The members name of the D & I Committee are as follows:-

- D & I Champion – Seema Ahluwalia
- D & I Allies – Debanshu Dutta
- Liason Officer – Usha Rani
- Anil Sharma
- Ujjal Chowdhury
- Abhishek Maheshwari
- Abhishek Mishra
- Anjali Srivastava
- Shweta Malviya
- Sangeeta Mazumder
- Amrish Kumar
- Vinay Rajput
- Shiladitya Bhattacharjee
- Mandeep Singh
- BL Choubey
- Sandeep Patil
- Prasad R Nair

2. Maintenance of Records

Sonepar India will collect and maintain data regarding employees with disabilities in relation to their employment, facilities provided and other necessary information as per The RPWD Act. All employees will be asked to fill the Voluntary Disability Self Identification Form in order to give information regarding any disability that she/he may have. An employee can edit the information at any time during her/his tenure. There will be no penalties imposed because she/he did not share information regarding her/his disability earlier.

An employee who acquires disability can also edit and update the form. The information that an employee shares about her/his disability will be kept confidential. It will be maintained in a separate file and not in her/his personal file.

Exceptions to the confidentiality clause:

- 1) Managers/Supervisors may be given information about an employee's disability for allowing/providing any accommodations.
- 2) Security personnel may be given information about an employee's disability so as to facilitate obtaining any necessary support during an emergency.
- 3) Government officials who are investigating the compliance with The RPWD Act may be given information about an employee's disability.

3.IC Committee

Employees with disability have the right to file a complaint concerning any discrimination with the Convenor who then reports to the IC Committee. Any policy violation i.e. when any person is discriminated against or not provided reasonable accommodation or denied access to any company facility, will be regarded as a grievance.

The IC Committee shall consist of:

- A senior management official as the Chairman of the Committee.
- Two employees at or above the General Manager level (one male and one female employee).
- Two employee representatives with disabilities (one male and one female employee shall be in the Committee once we will on-board among them).
- One external member shall be in the Committee once we will on-board among them from a disability organisation who is familiar with issues of discrimination on the basis of disability.
- Two employee representatives Transgender or LGBTQ+ (one male and one female employee shall be in the Committee once we will on-board among them).

The tenure of the members of the Committee will be 3 years.

She/he shall be appointed as the Convenor. She/he shall be trained in handling grievances

related to disability discrimination and harassment. The Convenor shall maintain all records related to grievances. The Convenor and the Committee shall follow the procedure of Grievance redressal as outlined in the Guidelines for conducting the Enquiry.

On investigation, if the employee against whom the complaint has been made is found guilty of discriminatory behaviour, she/he will be subjected to disciplinary actions. Possible action taken against the employee may include a reprimand, detraction of benefits for a definite or indefinite time period, demotion, denial of promotion and suspension or termination for more serious offences. Involuntary or indirect discrimination will be resolved through training, counselling and suitable modification of procedures when required to ensure fair treatment.

The members name of the IC Committee are as follows:-

- Head of the committee – Seema Ahluwalia
- Liasion Officer – Priyanka Pillai
- Convenor - Sangeeta Mazumder
- External Arbitrator – Gunjan Chhabra
- Amit Dembi
- Sandeep Singh Bhatia
- Anoop Baokar
- Debanshu Dutta
- Pooja Kaushik
- Janshi Lakshmi
- Amita Nanguru
- Shweta Malviya
- Biju C.S
- Abhishek Gupta
- Dipti Pawar
- Usha Rani
- Manish Mathur
- Ashpak Mokashi

9. Affirmative Action

Sonepar India for the purpose of promoting equality of opportunity, seeks to increase the representation of people with disabilities , Transgender or LGBTQ+ using suitable recruitment and outreach efforts. These include, but is not limited to:

- 1) Participation in job fairs, training and scholarship programmes and organising special recruitment drives and training and employment to them.
- 2) All training programmes conducted for people from lower socio-economic backgrounds will be inclusive.
- 3) A certain percentage of the CSR budget will be allocated for supporting all type of Programms to uplift all types of Gender.

Disclaimer:-Any Rules & Regulations covered in the scope of said Policy which have not been yet incorporated in our organisation has been considered as Key Action Plan towards D & I Initiative.