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1. PURPOSE

TASL is an Equal Opportunity Employer and is dedicated to offering equal opportunities to all employees and eligible job applicants. The Company does not discriminate any applicant for employment or any employee for promotion, training or career opportunity or compensation, based on nationality, race, colour, religion, caste, gender identity, sexual orientation, disability, HIV positive status, social origin, or any other such personal characteristic or status.

This Equal Opportunity Policy is in alignment with the Tata Code of Conduct and complies with the provisions of the Transgender Persons (Protection of Rights) Act, 2019, the Rights of Persons with Disabilities Act, 2016, Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Act 2017 (HIV/ AIDS Act), and is a reflection of TASL's commitment to eliminate discrimination and harassment of all persons, including transgenders persons, LGBTQ+, and persons with disabilities.

2. SCOPE

This policy is applicable to all employees & job applicants at TASL, its subsidiaries and JVs.

3. REFERENCE DOCUMENT/ STANDARD

- Tata Code of Conduct
- Transgender Persons (Protection of Rights) Act, 2019
- Rights of Persons with Disabilities Act, 2016
- Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Act 2017 (HIV/ AIDS Act)
- Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act

4. ABBREVIATIONS

HR	Human Resources
JV	Joint Venture
TASL	Tata Advanced Systems, its JVs & Subsidiaries
RPWD Act	Rights of Persons with Disabilities Act, 2016
HIV/ AIDS Act	Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Act 2017 (HIV/ AIDS Act)
POSH Act	Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act

5. TERMS & DEFINITIONS

- **Discrimination:** In relation to gender identity, disability, sexual orientation or HIV/ AIDS status, it means any unjust, unequal or unfair treatment of individuals based on their gender identity, disability, sexual orientation or HIV/AIDS status. This includes actions, policies, or practices that deny or limit equal access to opportunities, rights, benefits, or services, or that create a hostile, intimidating, or unfair environment. It includes all forms of Discrimination defined under RPWD Act, Transgender Person (Protection of Rights) Act, and HIV/ AIDS Act

The policy aims to ensure fairness, respect, and equity for all, free from bias or prejudice.

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- Equal Opportunity:** Ensuring that there is no unfair discrimination or harassment on any ground, including race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability or any other category protected by applicable law. It refers to the principle of providing all individuals, regardless of their gender identity, disability, or HIV/AIDS status, with fair and equal access to opportunities, rights, and benefits in employment. It ensures that no person is discriminated against or denied opportunities on the basis of their protected characteristics, as outlined in the Transgender Persons (Protection of Rights) Act, 2019, the RPWD Act, and HIV/AIDS Act, and the POSH Act. The policy commits to fostering an inclusive, respectful, and supportive environment where all individuals are treated with dignity and provided with equal opportunities to thrive.
- Gender Identity:** Person's deeply held sense of their own gender, which may be different from the sex they were assigned at birth.
- Harassment:** It is a form of discrimination and refers to any unwelcome, offensive, or discriminatory behaviour directed at an individual based. This includes any conduct, whether verbal, physical, or visual, that creates a hostile, intimidating, or humiliating environment. Harassment may involve derogatory comments, insults, threats, or actions that undermine the dignity, well-being, or rights of the individual. The policy aims to prevent all forms of harassment, ensuring a respectful, safe, and inclusive environment for all individuals.
- LGBTQ+:** Lesbian, Gay, Bisexual, Transgender, Queer (plus sign covers broad spectrum of sexual orientations, gender identities, and expressions).
- Person with Disability:** As per the RPWD Act, 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
- Reasonable accommodation:** As per the RPWD Act, it 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. Request for reasonable accommodation can be made in the format prescribed in Annexure 1
- Sexual Harassment:** It is defined as any unwelcome act or behaviour of a sexual nature, either directly or indirectly, that creates a hostile, intimidating, or offensive work environment. The act includes, but is not limited to: Physical contact and advanced, Demand or request for sexual favours, Making sexually coloured remarks, Showing pornography or any other unwelcomed conduct of sexual nature
- Transgender Person:** As per the Transgender Person (protection of Rights) Act, it means a person whose gender does not match with the gender assigned to that person at birth and includes trans-man or trans-woman (whether or not such person has undergone Sex Reassignment Surgery or hormone therapy or laser therapy or such other therapy), person with intersex variations, genderqueer and person having such socio-cultural identities as kinner, hijra, aravani and jogta.

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6. **GENERAL**

- a. Tata Advanced Systems Limited is an equal opportunity employer
- b. When recruiting, developing and promoting employees, the decisions will be based on performance, merit, competence and potential
- c. TASL Policies will be fair, transparent and clear, which will aim at promoting diversity and equality, in accordance with applicable law and other provisions of Tata Code of Conduct. The Policies provide for clear terms of employment, training, development and performance management.
- d. TASL will not engage in, nor tolerate discrimination or harassment on any ground, including race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability, HIV/ AIDS status or any other category protected by applicable law

7. **Guidelines:** The following is to be ensured in accordance with provisions of Tata Code of Conduct, Transgender Persons (Protection of Rights) Act, 2019, the RPWD Act, HIV/ AIDS Act, POSH Act and other applicable statutes on the subject:

- i. That the work environment is free from any discrimination, harassment or unfair treatment against persons on any ground, including race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability, HIV/ AIDS status or any other category protected by applicable law
- ii. A transgender person shall have a right to be recognised as such, in accordance with the provisions of the Transgender Persons (Protection of Rights) Act. A person recognised as transgender shall have a right to self-perceived gender identity. The gender of transgender person shall be recorded in all official documents in accordance with certificate issued by District Magistrate.
- iii. Access to Infrastructure & Amenities, including facilities creation & modification
 - aims to ensure that adequate infrastructure support and amenities (buildings, restrooms, canteens, gender neutral washrooms, hygiene products, facilities and other such services), and safety & security measures is provided, as applicable, to enable transgender persons to effectively discharge their duties in the establishment without any hindrance.
 - It is to be ensured that all relevant work spaces at TASL are accessible to persons with disabilities (Provision for ramps, lifts or ladder boards for wheelchair within premises), subject to compliance with any Health Safety Environment requirements applicable to such site including suitable including suitable arrangements for use of physical infrastructure, transportation and information & communications
 - Washrooms of disabled person to include an alarm button, suitably fixed, for use in case of an emergency
- iv. Recruitment & Selection
 - Preparation of a list of posts suitable for persons with disabilities in the establishment and shall notify such posts during the recruitment process
 - Job Vacancy shall include a statement on Equal Opportunity Policy, inviting applicants from across diverse backgrounds
 - Company specific guidelines to be incorporated for ensuring unbiased selection & screening process for all persons including disabled, transgender, women, and LGBTQ+
 - Reasonable Accommodation, as applicable, to be extended to the candidates during the recruitment process which may include provision of translator, or scribe, provision of assistive devices, as applicable, or suitable Adjustments to testing environments or processes, accessibility provisions at interview locations, etc

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- v. Employee Training, Development & Postings
 - Employees to be given access to role specific training facilities and learning & development programs
 - Transfers and postings are based on merit, suitability, and the operational needs of the company
 - In cases where a person with disability is due for a transfer or posting, consideration may be given to their preference, provided the same is in line with the company policy, meeting the role requirements and the nature of their work can be effectively performed
- vi. Emergencies: During all emergencies requiring evacuation, the first right of passage will be of people with disabilities. As deemed essential, requisite resources (e.g. wheelchairs) will be suitably provisioned and positioned to ensure smooth and expeditious evacuation. Specific individuals will be designated as buddies to assist in the process of evacuation.
- vii. Company shall take appropriate measures to ensure confidentiality of the personal data of employees, including gender identity
- viii. In line with the Company leave policy, special sick leaves may be granted at the discretion of the Management and in consultation with the Medical Officer of the company for major ailments and only after all accumulated SL and PL have been exhausted

8. Complaints-cum-Liaison Officer

A designated HR Spoc will act as the Complaints-cum-Liaison Officer under The Transgender Persons (Protection of Rights) Act, 2019, Rights of Persons with Disabilities Act, 2016 and HIV/ AIDS Act to address all grievances or complaints regarding discrimination from persons on ground of harassment, disability, gender identity, sexual harassment or any other discrimination within stipulated timelines. The Officer will also look after the recruitment of persons with disabilities and provisions of facilities and amenities for such employees. The name and contact number of the Complaints-cum-Liaison Officer shall be conspicuously displayed at each location (Annexure 2).

9. Grievance Redressal

- i. The Complaints-cum-Liaison Officer shall address the grievance raised as per Company process
- ii. There will be no retaliation against and individual raising concerns raised in good faith
- iii. For all Complaints, confidentiality of the complainant shall be respected
- iv. All Complaints pertaining to Sexual Harassment shall be governed by the Company's POSH Policy
- v. Monthly updates on the complaints received shall be shared with the Head-HR, TASL

10. Role & Responsibility of Complaints-cum-Liaison Officer

- i. Receiving Complaints: Act as the primary point of contact for receiving complaints related to discrimination, harassment, or denial of equal opportunities based on gender identity, disability, HIV/AIDS status, or gender-related issues.
- ii. Ensure that complaints are handled in a confidential, sensitive, and respectful manner.
- iii. Investigate complaints of discrimination or harassment thoroughly, impartially, and promptly, ensuring the process is fair and transparent. Ensure that investigations are conducted in compliance with the relevant statutes
- iv. Take necessary actions to address and resolve complaints
- v. Awareness & Training: Promote awareness about Company Equal Opportunity Policy, and conduct periodic trainings for employees, in collaboration with Unit Business HRs and L&D Team, to ensure they

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understand the significance of equal opportunity, non-discrimination, and the importance of respecting diversity, including gender identity, disability, HIV/AIDS status, and sexual orientation.

- vi. Provide support to complainants, including guiding them through the complaint process, ensuring they have access to appropriate resources, and safeguarding their rights and dignity.
 - vii. Monitor the implementation of the Equal Opportunity Policy, ensuring that there are no instances of discrimination or harassment
 - viii. Periodically report to management regarding the status of complaints, resolutions, and any emerging issues related to equal opportunity and inclusion.
 - ix. Confidentiality and Sensitivity:
 - Maintain confidentiality throughout the process to protect the privacy of the complainant and any involved parties
 - Ensure that no retaliation occurs against individuals who file complaints or participate in investigations
 - x. Compliance with Legal Provisions: Ensure compliance with the provisions of this Policy and Transgender Persons (Protection of Rights) Act, 2019, Rights of Persons with Disabilities Act, 2016, HIV/AIDS Act, and the POSH Act, in collaboration with the Employee Relations & Legal Team
 - xi. The Compliance-cum-Liaison Officer shall receive requests for Reasonable Accommodation. He/ She shall take inputs from Unit HR and Admin Team and close the request in alignment with the Management.
 - xii. Any other relevant role or responsibility as included in the Transgender Persons (Protection of Rights) Act, 2019, Rights of Persons with Disabilities Act, 2016, or HIV/AIDS Act
- b. **Statutory Compliance:** In regard to any aspect not specifically mentioned in this Policy, the provision of The Transgender Persons (Protection of Rights) Act, 2019, Rights of Persons with Disabilities Act, 2016 & Rules, HIV/ AIDs Act or POSH Act, shall apply. In the event of any conflict, ambiguity or inconsistency between this Policy and the applicable statutes, this policy shall be suitably amended and modified in a manner to ensure that stipulations as provided under the relevant statute are captured adequately.
- c. **Communication of Policy:** Policy will be available on HRMS and corporate website. It will also be available at all conspicuous places in Factories and Offices. All employees will undergo a training on Tata Code of Conduct, POSH guidelines, significance of equal opportunity, inclusion, non-discrimination, and the importance of respecting diversity, including gender identity, disability, HIV/AIDS status, and sexual orientation.
- d. **General:** Any exception to the policy can be done only with the prior approval of Head - HR, TASL

11. AMENDMENT RECORD SHEET

Date	Revision No.	Section No.	Change Summary
01-April-2020	00	All	Initial Release
12-Oct-2022	01	All	Revised Release on COSMOS/ CHROMA
26-Nov-2024	02	Section 1 & 3	Revised Release on COSMOS/ CHROMA Introduction of Annexures

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Annexure 1 - Reasonable Accommodation Form

This form is for job applicants, or employees or requesting reasonable accommodations to support their ability to perform their duties and participate fully in the workplace (as per RPWD Act)

1. Personal Information

- Full Name:
- Employee ID (if applicable):
- Unit:
- Location:
- Contact Information:
- Date of Request:

2. Specific Accommodation(s) Requested: Please describe the specific accommodation(s) you are requesting in detail

3. Reason for request: Please explain how the requested accommodation(s) will help you perform your duties and ensure that you have equal access and opportunities to succeed in your role. Please attach any relevant documentation to support your request, such as medical certificates or assessments that verify your disability and the need for accommodation. The documentation will be used to assess the request and ensure compliance with the Rights of Persons with Disabilities Act, 2016.

I certify that the information included in this form is true & correct.

Signature of Employee: _____

Date: _____

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Annexure 2

Complaints-cum-Liaison Officer

Tata Advanced Systems, including its JVs & Subsidiaries, is an Equal Opportunity Employer and is dedicated to offering equal opportunities to all employees and eligible job applicants. The Company does not discriminate any applicant for employment or any employee for promotion, training or career opportunity or compensation, based on nationality, race, colour, religion, caste, gender identity, sexual orientation, disability, HIV +ve status, social origin or any other such personal characteristic or status.

In accordance with the **Transgender Persons (Protection of Rights) Act, 2019**, **Rights of Persons with Disabilities Act, 2016**, and the **Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Act, 2017 (HIV/AIDS Act)**, the Company has designated a **Complaints-Cum-Liaison Officer** to address concerns related to discrimination, harassment, and to ensure compliance with the Equal Opportunity Policy:

Name –

Designation –

Location –

Email ID –

Contact Number –

Kindly refer to TASL' Equal Opportunity Policy for additional details.

Management,

<Unit Name>