

OBJECTIVE:

The Equal Opportunity & Non-Discrimination Policy is applicable for all job applicants and employees of The Anup Engineering Ltd (TAEI) and is to ensure below rights.

- TAEI employees or potential employees do not suffer from unfair discrimination in the workplace.
- Employee get to work in an environment where all the decisions are free of discrimination, and where employees and potential employees get an equal employment opportunity based on relevant abilities and merit.
- Employees and management staff are encouraged to take positive action towards promoting equal opportunity throughout the TAEI business.
- Personnel actions, such as compensations, benefits, transfers, layoffs, company-sponsored training program, and any social or recreational program will be administrated on Non-Discrimination basis.

WHAT IS DISCRIMINATION AT WORKPLACE?

Discrimination at workplace occurs when an employee is treated unfavourably because of certain attribute. Following are the attribute which may involve in the discrimination:

- Conduct that involves harassing, coercive or disruptive, including sexual harassment.
- Making any form of offensive statement about another employee's clan, religion, ethnic background, colour, sex or disability.
- Expressing negative stereotypes about particular groups
- Judging any employees on their political or religious beliefs

EQUAL EMPLOYMENT OPPORTUNITY AND PROVISION OF SERVICES:

This policy refers to the principle which ensures that the employees and potential employees of TAEI Business are treated with equality and fairly, regardless of their race, sex, or disability. All the employees have equal chance to apply for any internal job postings or promotions, training opportunities at the workplace. The mentioned activities shall be conducted in a uniform manner for all the employees:

- Recruitment procedure and selection criteria for appointment or engagement of a person as an employee
- Promotion and transfer of an employee
- Training and development for an employee
- Terms of employment or any other activity pertaining to the employee

PARAMETERS OF DISCRIMINATIONS

TAEI employees shall strive to create a working environment which is free from discrimination in the employee practices against any potential and existing employee and shall not be discriminated on basis of:

- Age or other circumstances
- Any kind of Disability
- Colour, physical features
race, ethnicity or nationality
- Cultural or social beliefs
- Educational background
- Political opinion
- Gender & Sexual orientation
- Marital Status
- Pregnancy or impact on potential pregnancy
on decisions
- Health or physical disability, HIV Status

COMPLAINT PROCESS AND PROCEDURES

We encourage our employees, customers, suppliers, and other stakeholders to raise concerns or make disclosures when they become aware of any actual or potential violation of policy.

1. All suspected violations can be reported anonymously through
 - a. Web Portal- www.in.kpmg.com/ethicshelpline/arvind
 - b. Toll free number – 1800 200 8301
 - c. Email - arvind@ethicshelpline.in
2. Avenues available for raising concerns or queries or reporting cases could include:
 - a. Immediate line manager or the human resources department
 - b. Designated ethics official of TAEI
 - c. The confidential reporting third party ethics helpline
 - d. Any other reporting channel set out in our company's 'Whistle blower Policy'.
 - e. Any other reporting channel set out in TAEI's POSHA Policy
3. We do not tolerate any form of retaliation against any one reporting any concerns. Anyone involved in targeting such a person will be subject to disciplinary action.
4. If you suspect that you or someone you know has been subjected to retaliation for raising a concern or for reporting a case, we encourage you to promptly contact your line manager, Group Ethics Officer, the Human Resources department.
5. The company provides resources to assist all employees who encounter ethics and compliance issues that are difficult to resolve.
6. An employee's manager or supervisor is the first and best resource, since this person is familiar with the employee's duties. If the manager or supervisor is not available, or if the employee is not comfortable discussing the matter with his or her manager, the following resources are also available:
 - a. The employee's Business, Function, or Site Leadership.
 - b. The employee's Group Ethics Officer.

- c. Human Resources, especially regarding workplace
- d. Human Resources, especially regarding workplace issues and policies, such as non-discrimination, non-harassment, and employee privacy

ADDRESSING POSSIBLE MISCONDUCT

1. Corrective Action & Investigations: To ensure prompt, consistent enforcement of this Code of Conduct, the company will investigate reported instances of misconduct, such as violations of the law, regulations, or company policies and procedures. Where misconduct is identified, responsible individuals will be held accountable and disciplined, as applicable, up to and including employment termination and possible civil or criminal action. Making an intentionally false accusation of wrongdoing is considered misconduct.
2. Non-retaliation: We must maintain an environment where concerns and potential problems are brought forward. TAEI will not tolerate retaliation against anyone who, in good faith, raises a concern, reports suspected misconduct, or provides information related to an inquiry of suspected misconduct. The company will investigate any instances of possible retaliation, and discipline employees who have retaliated against someone who has reported possible misconduct.

TAEI is committed to providing equal opportunities without any discrimination on the grounds of age, colour, disability, origin, nationality, religion, race, gender, or sexual orientation and will not engage in any kind of verbal or physical harassment based on any of the above or any other reason.

To this end:

- Our employees are personally responsible for treating each other with respect and dignity, which includes respecting the rights and differences of others.
- Employment with TAEI or any group companies / subsidiaries will be based on merit and not on any irrelevant attributes or characteristics that an individual may possess.
- Developmental and promotional opportunities will be based on performance, ability and potential, and will be consistent with the needs of the business.
- TAEI will not tolerate harassment, behavior that is discriminatory or behaviour that victimizes any individual or group in our workplaces. Appropriate action basis investigation will be taken if employees breach this policy either through discrimination, harassment, bullying or victimizing other employees or by making false claims. If an employee feels he or she is being subjected to discrimination, harassment, bullying or victimization, he or she can raise the same with the HR department or use the existing grievance redress mechanisms like Whistle-blower on a confidential basis either by telephone, email or by letter. All grievances and complaints will be taken seriously and treated with sensitivity and fairness.

In lieu of the Rights of Persons with Disabilities Act 2016 and Rules, TAEI as per specific requirement, shall ensure that proper infrastructure and reasonable accommodation is provided to persons with disability to enable them to effectively discharge their duties at the establishment. TAEI has a designated Diversity & Inclusion Council that shall oversee the provision of the infrastructure and facilities required for the process of recruitment for Persons with Disabilities.

ROLES & RESPONSIBILITIES:

- Employee Responsibilities: All TAEI employees have the following responsibilities:
 - o To comply with this policy and all applicable laws and regulations. Compliance is required whenever an employee is acting in their capacity as a representative of the Company
- Responsibilities of Managers and supervisors: Managers and supervisors have the following additional responsibilities:
 - o To take reasonable steps to resolve complaints that are brought to their attention and to maintain confidentiality as far as practicable.
- Human Resources Responsibilities: Human Resources representatives have the following additional responsibilities:
 - o To provide advice and address grievances relating to the employment of persons with disabilities and/or any other complaints regarding discrimination in any other form against any job applicant/employee.

INTERPRETATION & GUIDANCE:

In the event that any additional guidance and/or further interpretation is required, please contact your BUHR.

REVIEW TIMELINES:

The policy will be reviewed basis changes in legal and market guidelines

COMMUNICATION OF POLICY:

Policy will be available on intranet to all employees and our corporate website. It will also be available at all conspicuous places in factories and sites.

All employees will undergo a training on Code of Conduct which form a basis of this policy, through e-modules and/or classroom sessions.