

EQUAL OPPORTUNITY POLICY

Introduction

LMW Limited (formerly known as Lakshmi Machine Works Limited) recognizes the value of a diverse workforce. The Company is 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. This Equal Opportunity Policy is in accordance with the provisions of The Rights of Persons with Disabilities Act, 2016 ("RPWD Act").

LMW provides equal employment opportunities to all and makes people-related decisions based on merit and business needs. When recruiting, developing and promoting our employees, our decisions will be based solely on performance, merit, competence and potential. There shall be no discrimination on the basis of race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic, origin, disability or any other category protected by applicable Law. Our employees are personally responsible for treating each other with respect and dignity, which includes respecting the rights and differences of others.

We shall have fair, transparent and clear employee policies which promote diversity, inclusion and equity, in accordance with applicable Law and provisions of code of conduct. We ensure to provide clear terms of employment, training, development and performance management.

Policy Statement

- LMW is committed to eliminating all forms of unlawful discrimination (which includes direct discrimination, indirect discrimination and denial of reasonable accommodation), bullying and harassment of people with disabilities. As per specific requirement under Rights of persons with Disability act 2016, organization 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.
- LMW is committed to continuously strive to ensure that all its facilities, technologies, information and privileges are accessible to people with disabilities.
- Employment with LMW will be based on merit and not on any irrelevant attributes or characteristics that an individual may possess. LMW commits that no opportunity will be denied to Persons with Disabilities and there will be no discrimination of any manner.
- LMW encourages candidates with differing abilities to apply. Decisions on employment, career progression, training or any other benefits will be solely based on merit. LMW follows an inclusive evaluation process by ensuring that a person with disability 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.
- Developmental and promotional opportunities will be based on performance, ability and potential, and Purpose will be consistent with the needs of the business.

- 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 organisation will invest in re-skilling the employee for another position at the same rank or higher.
- LMW is committed to promoting awareness on equal opportunity and inclusion of people with disabilities among all employees by organising training and sensitization programs and campaigns.
- Organization will not tolerate harassment, behavior that is discriminatory or behavior 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 / IR department or use the existing grievance redress mechanisms on a confidential basis either by telephone, email. Complaints will be taken seriously and treated with sensitivity and fairness.

Scope

The Policy covers all persons with disabilities. 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.

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

Definitions

All terms as defined in The RPWD Act, and the applicable Rules thereon apply to this policy. Also, the disability categories as identified in the Schedule to the RPWD Act is applicable to this Policy.

Policy Details

1. Facilities and amenities

a). Physical Infrastructure

LMW aims to ensure that its physical infrastructure (buildings, furniture, facilities and services in the building/campus) adheres to the accessibility Standards as given / cited in The RPWD Act and other applicable Rules. LMW will continuously aim to revamp its existing buildings 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

LMW will continuously endeavor to ensure that all its documents, communication and information technology systems adhere to the accessibility standards as prescribed in the RPWD Act and the Rules framed thereunder. Digital infrastructure accessibility will involve having appropriate Web and Document standards that enable people with disability to operate seamlessly. LMW 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 the Liaison Officer.

c). Reasonable Accommodation

The Company 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.

Request for reasonable accommodation can be made to the Liaison Officer.

2. List of positions identified

At LMW all positions are open for people with all types of disabilities. The hiring is purely based on merit and on the candidate's abilities being commensurate with requirements of the job. People with disabilities so hired shall be posted at the nearest available position / office, where they will face no hindrance with respect to their work. Wherever necessary, assistive devices in the form of ramps, railings, wheelchair etc shall be ensured for such employees.

3. Manner of selection, transfer and posting

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 organisations.
- 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 needed for the job and nothing else.
- Application forms will be made available in alternate formats, based on request.

b). Selection Process

Persons with disability shall be eligible for all open positions throughout the organization through defined recruitment channels. They shall be granted relaxations as defined in our Recruitment Policy against the normal eligibility criteria. Being an equal opportunity employer, parity on salary and benefits will be maintained at all times.

c). Transfer and Posting

Employees with disability can apply for transfer or job rotation. This request will be considered as per the requirement and the Appointment Order / Standing Order of the Company. While transferring or job rotation, the Company will ensure that the nature of work assigned corresponds to their special ability, are feasible to perform their work without any hindrance.

4. Other facilities

a). Training and Career development

The Company will endeavor to provide course materials meant for induction and training in accessible formats on request. LMW Limited Training Policy guidelines have evolved on the philosophy "Training for All". Every employee has a right to receive need-based training at regular intervals to enable him/her to develop potential, competence and thus contribute his / her best to the organization. HR / IR - Training Development, responsible for organization need based training at LMW, gives due consideration while nominating employees with special abilities.

The Company has an accessible and inclusive appraisal process. Any employee / Manager requiring any accommodations for an appraisal process must place a request with Head Admin / Travel Desk at least two days in advance.

b). Disability Leave

If leave eligibility of the specially abled employees are exhausted, on medical ground, the employee can avail Loss of Pay for a period up to 30 (Thirty) days. The loss of pay will be granted for such period subject to the submission of valid medical documents.

c). Travel, Stay and Transport

For official travel (Local, Outstation or International), the employees will be provided accessible mode of transport, guest house and hotels in line with the position that he / she is having. An employee can place a written request via email for this with the Travel Desk.

d). Employee Engagement and Social Inclusion

LMW will endeavor 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.

Governance Framework

Head HR and IR are responsible for ensuring that the establishment operates in compliance with The RPWD Act, 2016 and to fulfil the terms of this Policy. The following structures shall also be in place:

1. Liaison Officer

As per the mandate of The RPWD Act, LMW has identified Head HR / Head IR as Liaison Officer(s) who will be responsible for taking initiative and providing the requisite support needed to realise 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 organisation.
- 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 will share the quarterly progress report with the HR and IR Head who would then present the progress report to the CEO / MD and the Disability Leadership Council.

2. Other Employees

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. Following are the roles and responsibilities of employees, Managers and HR / IR:

Employee Responsibilities

All LMW employees have the following responsibilities:

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:

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:

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

Maintenance of Records

LMW 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:

- Managers / Supervisors 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 so as to facilitate obtaining any necessary support during an emergency.
- Government officials who are investigating the compliance with The RPWD Act may be given information about an employee's disability.

Grievance Redressal Mechanism

Employees with disability have the right to file a complaint concerning any discrimination with the Liaison Officer. Any policy violation i.e. when any person with disability is discriminated against or not provided reasonable accommodation or denied access to any company facility, will be regarded as a grievance. The Liaison Officer shall submit the Action Taken Report on the grievances received with Head HR / IR.

Whenever there is a requirement an ad-hoc Grievance Redressal Committee can be constituted by the Chairman and Managing Director and the Liaison Officer then reports to the unclosed grievances to the Committee.

The Grievance Committee shall consist of a senior management official as the Chairperson of the Committee and besides the Chairperson there shall be three other Members. One among the three other Members shall be an external Member from a disability organisation who is familiar with issues of discrimination on the basis of disability.

The CEO / MD shall have the powers to reconstitute the Committee as and when required. The tenure of the Grievance Redressal Committee will be valid until the Grievance(s) so reported remains unresolved.

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.

Affirmative Action

The Company for the purpose of promoting equality of opportunity, seeks to increase the representation of people with disabilities using suitable recruitment and outreach efforts. These include, but is not limited to:

- Participation in job fairs, training and scholarship programs and organising special recruitment drives and training and employment of people with disabilities who have high support needs.
- All training programs conducted for people from lower socio-economic backgrounds will be inclusive.
- A certain percentage of the CSR budget will be allocated for supporting disability programs.

Communication of Policy

Policy will be available at Intranet and notice boards at conspicuous place for all employees and our corporate website www.lmwglobal.com. Code of conduct would be amended with any revision of this policy. As all employees have signed on code of conduct, it would become basis for adherence to this policy. Awareness sessions regarding same will be conducted for all employees.

Power to amend the Policy

The Managing Director shall have the power to amend the policy whenever the same is so required consequent to any change(s) in the RPWD Act or other applicable Rules.