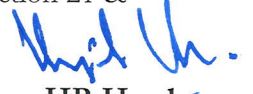


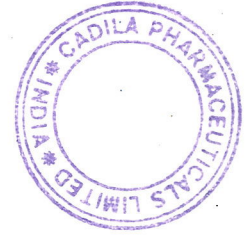
Date- 12/12/2023

As on date, the following, policy on Equal Opportunity has been made pursuant to Section 21 & Rule 8 of the Rights for Persons with Disability Act, 2016.


HR-Head

(Signed and sealed)

(To be displayed online on the website/Cadence)



Document title: Equal Opportunities Policy

DATED

EQUAL OPPORTUNITIES POLICY

BRIEF OUTLINE

1. Checklist- **Who all are protected covered under this policy?**

Sr. No.	Details	Checklist
	<p>All employees- (regular/temporary/ad-hoc, daily wagger, volunteer, employed through an agent/third party, apprentice, contract worker, trainee etc.</p> <p>a. Any one belonging to the protected characteristic(of age, disability/HIV Status, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, caste, tribe or other social groups, ethnic or national origin, religion or belief, sex or sexual orientation)</p>	✓

2. Checklist- **Where can I get guidance/suggestions if I face challenges at work?**

Sr. No.	Details	Checklist
A.	<p>Any employee, casual worker,</p> <p>If you need any guidance/help relating to this policy, you can approach the <u>Equality Champion or the Head HR</u></p>	✓

3. Checklist- **Where can you raise a complaint of discrimination /harassment?**

Sr. No.	Details	Checklist
B.	<p>Any employee, casual worker,</p> <p>If you are any other person who is a victim of harassment Under the General Grievance Redressal Policy <u>to the Head HR</u></p>	✓
B.	<p>If you are a female/trans-female who is victim of sexual harassment at workplace</p> <p>Under PoSH Policy (Zero Tolerance Against Sexual Harassment Policy) <u>to the Internal Committee.</u></p> <p>Alternatively you can complain on Shebox Portal (http://www.shebox.nic.in) or file a FIR under the Indian Penal Code.</p> <p>If you are a transmale/transfemale, you can approach https://transgender.dosje.gov.in/Applicant/Registration/ApplyNow 4.</p>	✓

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C.	<p>If you are a person with disability who is a victim of discrimination/harassment you can approach the <u>Head HR</u> under the General Grievance Redressal Policy.</p> <p>Alternatively, you can also write to the authorized person as displayed on the link</p> <p>https://www.swavlambancard.gov.in/cms/grievance-of-pwd https://pgportal.gov.in/Home/NodalPgOfficersState</p>	✓
D.	<p>If you are a person who belongs to a social group (SC/ST) and is a victim of discrimination/harassment you can approach the <u>Head HR</u> under the General Grievance Redressal Policy.</p> <p>Alternatively, you can also write to the State Commission for redressal/FIR under Prevention of Atrocities Act.</p> <p>https://ncsc.nic.in/contactus https://ncst.nic.in/content/regional-offices</p>	✓
E.	<p>If you are a person who HIV status and is a victim of discrimination/harassment you can approach the <u>Head HR</u> under the General Grievance Redressal Policy</p>	✓

1. Our commitments

We are committed to promoting equal opportunities in employment. Any employee and any job applicants will receive equal treatment regardless of their age, disability/HIV status, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (**Protected Characteristics**).

2. About this policy

- a. The purpose of this policy is to set out our approach to equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with Cadila Pharmaceuticals Ltd. including recruitment, pay and conditions, benefits and conditions, flexible work and leave, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.
- b. This policy does not form part of any contract employment or other contract to provide services and we may amend it any time.

3. Who does this policy apply to?

- a. This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns.

4. Who is responsible for this policy?

- a. The Board of Directors (the Board) has overall responsibility for the effective operation of this policy but has delegated responsibility for overseeing its day-to-day implementation to the Head of the HR Department.
- b. Line managers have the overall day-to-day responsibility for the effective implementation of this policy and you should refer any questions about this policy to them in the first instance.
- c. We also have workplace equality champions within the organisations who are trained to support individuals who have suffered discrimination, harassment or victimisation through the process of raising a complaint. They are also Liaison Officers under the RPWD Act (Rights of People with Disability Act). Details of our equality champion can be [found at Cadila Pharmacy Ltd. Corporate Governance webpage] or obtain details from Head of the HR.
- d. All managers must set an appropriate standard of behaviour, led by example and ensure that those they manage adhere to the policy and promote equal opportunity, and equal protection under this policy.

- e. This policy is reviewed annually by Head HR with reference to the latest amendments in the law.

5. Discrimination

- a. You must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts [or when acting in an official capacity]), and on work-related trips or events including social events.
- b. The following forms of discrimination are prohibited under this policy and are unlawful:
 - i. **Direct discrimination:** treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay.
 - ii. **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others, and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
 - iii. **Harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Zero Tolerance, Anti- Sexual Harassment and Anti- Retaliation Policy.
 - iv. **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
 - v. **Disability discrimination:** this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

6. Recruitment and selection

- a. Addition of new work force and recruitment-
 - i. Depends upon opening of new posts or offices or increased volume of operations
 - ii. Resignation of an employee
 - iii. Termination of an employee due to death/decision of a disciplinary hearing/ completion of tenure

iv. Expansion of work in new areas

All recruitments are assessed by the Programme, and Finance Manager on timely intervals. The same will be followed up by an approval of the CMD or authorised personnel before the post is advertised. The salary proposed must be within limit of budgetary approvals for the post in the organisation

- b. Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. Our recruitment procedures should be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities.
- c. Announcements of vacancy

Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying. [They should include a short policy statement on equal opportunities and a copy of this policy will be made available on request.]

- i. Announcements will be made internally and externally.
 - ii. External appointments will be sought when suitable internal candidates are available.
 - iii. Vacancy might not be announced for consultancy appointment
 - iv. Team Co-ordinators can call for applications through advertisements, and shortlist on the basis of job requirement
 - v. A written test, and an interview should be conducted of the prospective candidate by the Talent Acquisition Team.
- d. All shortlisting decisions about appointments shall be the responsibility of the Talent Acquisition Team.
 - e. A formal appointment in CADILA shall be the CMDs prerogative, however in the absence the same the Lead of Talent Acquisition Team can be consulted for respective projects.
 - f. Joining details are to be in lines with an employment agreement.

7. Induction Process

- a. We take steps to ensure that our vacancies are advertised to a diverse online recruiting platforms [and, where relevant, to particular groups that have been identified as disadvantaged or underrepresented in our organisation]. [Where appropriate, [the HR Department **OR** Position may approve the use of lawful exemptions to recruit someone with a particular requirement, for example, where the job can only be done by a woman. The advertisement should specify the exemption that applies.] Such as for example care taker at crèche as mandated by NCW Guidelines for Creche is a woman.

- b. Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.
- c. Job applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with the approval of the HR Department. For example:
 - i. Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments).
 - ii. Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment.
 - iii. Positive action to recruit disabled persons.
 - iv. Equal opportunities monitoring (which will not form part of the selection or decision-making process).

Where necessary, job offers can be made conditional on a satisfactory medical check.

- d. To ensure that this policy is operating effectively, and to identify groups that may be underrepresented or disadvantaged in our organisation, we monitor applicants' ethnic group, gender, disability, sexual orientation, religion and age as part of the recruitment procedure. Provision of this information is voluntary and it will not adversely affect an individual's chances of recruitment or any other decision related to their employment. The information is removed from applications before shortlisting, and kept in an anonymised format solely for the purposes stated in this policy. Analysing this data helps us take appropriate steps to avoid discrimination and improve equality and diversity.

8. Training and promotion and conditions of service

- a. Training needs will be identified through regular appraisals. You will be given appropriate access to training to enable you to progress within the organisation and all promotion decisions will be made on the basis of merit.
- b. Workforce composition and promotions will be regularly monitored to ensure equality of opportunity at all levels of the organisation. Where appropriate, steps will be taken to identify and remove unjustified barriers and to meet the special needs of disadvantaged or underrepresented groups.
- c. Our conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all of you who should have access to them and that there are no unlawful obstacles to accessing them.

9. Termination of employment

- a. We will ensure that redundancy criteria and procedures are fair and objective and are not directly or indirectly discriminatory.
- b. We will also ensure that disciplinary procedures and penalties are applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

10. Disabilities

- a. If you are disabled or become disabled, we encourage you to tell us about your condition so that we can support you as appropriate.
- b. If you experience difficulties at work because of your disability, you may wish to contact the HR Department/Equality Champion to discuss any reasonable adjustments that would help overcome or minimise the difficulty. We will conduct a meeting to discuss with you, inform you about a plan in writing. If you wish to avail the benefits under this policy, you will have to write a request for consideration formally and submit to the Head HR.
- c. It may be necessary for us to examine the situation at hand and may involve interviewing, taking statements from you and experts, review relevant documents to further your request. For example- Your line manager **OR** the HR Department may wish to consult with you and your medical adviser/psychiatrist/care taker about possible adjustments. We will consider the matter carefully and try to accommodate your needs within reason. If we consider a particular adjustment would not be reasonable we will explain our reasons and try to find an alternative solution where possible.
- d. We will arrange for a meeting, within a week of receiving your request. This will enable you to explain the situation to and how it can possibly be resolved. After this initial meeting, we may carry two more meetings to resolve the challenge. Such meeting will be arranged without unreasonable delay.
- e. We will write to you within a week of the final meeting, to inform you the decision.

11. Part-time and fixed-term work

Part-time and fixed-term staff should be treated the same as comparable full-time or permanent staff and enjoy no less favourable terms and conditions, unless different treatment is justified.

12. Breaches of this policy

- a. We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.
- b. If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure or through our Zero Tolerance, Anti- Sexual Harassment and Anti- Retaliation Policy as appropriate. Complaints will be treated in confidence and investigated as appropriate.
- c. There must be no victimisation or retaliation against staff who complain about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.

13. Related policies

This policy is supported by the following other policies and procedures:

- i. Zero Tolerance, Anti- Sexual Harassment and Anti- Retaliation Policy.
- ii. Grievance Procedure.
- iii. Disciplinary Procedure.
- iv. Flexible Working Procedure.
- v. Maternity, Paternity, Adoption and Shared Parental Leave Policies.
- vi. Parental Leave Policy.
- vii. Dress Code.
- viii. Homeworking Policy.
- ix. Hybrid working Policy.
- x. Sickness absence policy/ Disability Leave Policy

14. Annexure A

Reasonable adjustment decision process and form

How to use this form

This process and form is most helpful where CPL feels an adjustment might be unreasonable for them to make. This document will help the HR manager make an evidence-based decision about whether or not a workplace adjustment is 'reasonable'.

The process for deciding if an adjustment is 'reasonable'

The law does not require employers to make adjustments that are not reasonable. However, to determine whether or not a requested adjustment is reasonable for CPL, you need to go through some steps to ensure that you have considered this thoroughly. There are three parts to doing this:

- (1) deciding if the duty to make a reasonable adjustment is required,
- (2) identifying possible adjustments;
- (3) deciding which (if any) of those adjustments are reasonable.

(1) Is an adjustment required?

- Is the person disadvantaged or experiencing a barrier at work?
- Are they experiencing this disadvantage/barrier because of their disability?

If the answer is 'yes' to both of these, you then need to make a reasonable adjustment.

(2) What adjustments could remove this barrier?

Think about what would remove the barrier for the individual. Include the employee in this discussion as they may also be aware of what would help them.

(3) Is the adjustment 'reasonable'?

- Effectiveness – how well does the adjustment in question remove or at least minimize the disadvantage?
- Practicability – how practical is the adjustment? For example, how long will it take to implement, will anyone need extra training, etc?
- Cost – for example, how much will it cost, what financial resources available to the organisation (including schemes such as Access to Work, for example), can your organisation afford it?
- Disruption – how disruptive to the business, to others, and to the needs of the organisation would it be to make this adjustment?
- Risk – would making this adjustment cause any risk to others? (Note: An adjustment will not be 'reasonable' if anyone's health and safety would be compromised by making that adjustment.)

Ensure that you consider all information available to you when answering the above – for example reports from occupational health, medical professionals, or other workplace assessments – and ensure that you document both your decision-making process and the decision. The boxes below will help CPL to document a decision.

Reasonable Adjustment Decision Form

Name of individual or case identification The name of the individual or the way in which this case is identified
Identified barriers and discussion with individual Enter a brief description of the barrier that has been identified and how the individual feels about the proposed adjustment in question
Effectiveness Detail how effective the adjustment under consideration would remove or minimise the identified barrier for the individual

Practicality
Detail the practicalities of making this adjustment – for example, the length of time it will take to implement; any additional resources needed to implement or maintain the adjustment.
Cost
Detail the cost of this adjustment and how it will be funded. Ensure all sources of funds are considered (such as Access to Work).
Disruption
Detail the extent of disruption and the effect making this adjustment will have on other stakeholders and the business as a whole.
Health and safety risk
Detail the level of health and safety risk of all stakeholders involved in making this adjustment.

Additional evidence to support decision
List the evidence that was considered to help reach the decision
<ul style="list-style-type: none"> • [Example: Assessment from occupational health stated...] • [Example: Access to Work report identified...]

Decision and next steps
Details of the decision made by the organisation and next steps

Completed by	
Job title	
Department	
Date	

Verified by	[This decision should be signed off by a senior member of staff]
Job Title	
Date	