

## EQUAL OPPORTUNITY POLICY FOR PERSONS WITH DISABILITIES

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### PREAMBLE AND OVERVIEW

At Cleanmax, 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 Cleanmax, workforce diversity is a business imperative. We 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. This Equal Opportunity Policy is in accordance with the provisions of The Rights of People with Disabilities Act, 2016.

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### POLICY STATEMENT

Cleanmax is committed towards eliminating all forms of discrimination, bullying and harassment of people with disabilities at workplace. At Cleanmax, we continuously strive to ensure that all our facilities, technologies, information, and privileges are accessible to people with disabilities. 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 is provided with any suitable flexibility and accommodation that may be required so that they may be evaluated fairly. Any information shared by employee on disability/medical condition will remain confidential. If an employee acquires a disability during their employment tenure, they 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.

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### SCOPE

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

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## 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 their 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.
- “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 or 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.

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## POLICY DETAILS

### 1. Facilities and Amenities

#### a) Physical Infrastructure

Cleanmax aims to ensure that the physical infrastructure (buildings, furniture, facilities and services in the building/campus and transportation) adheres to the accessibility standards as prescribed by the Government of India. Any new facility that is built, renovated, 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 HR/Admin team at their location or write to the Liaison Officer.

**b) Digital Infrastructure**

It is our continuous endeavour to ensure that all our documents, communication and information technology systems adhere to the accessibility standards. We will ensure that only accessible technologies are procured. Any employee facing accessibility challenges can reach out to the IT team or write to Liaison Officer.

**c) Reasonable Accommodation**

We 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. Cleanmax 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**

Cleanmax is an Equal Opportunity Employer. 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.
- 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**

- If a person with disability needs any specific reasonable accommodation for the interview, they 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.
- 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 Benefits**

**a) Training and Career Development**

Cleanmax will endeavour 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 HR Team/Liaison Officer at least two days in advance.

**b) Disability Leave**

An employee's request for extra leave, for a reason related to their disability, will be treated as a request for reasonable accommodation and will be evaluated accordingly. Cleanmax provides an option of unpaid special leave for a maximum period of three months for employees with disabilities who plan to undergo medical treatment.

**c) Travel, Stay and Transport**

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

#### **d) Employee Engagement and Social Inclusion**

Cleanmax 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.

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### **GOVERNANCE FRAMEWORK**

The Managing Director is responsible for ensuring that the establishment operates in compliance with The RPWD Act, 2016 and to fulfil the terms of this policy. The HR Head takes 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. Disability Leadership Council**

The Disability Leadership Council comprises of representatives of all business units/functions, two elected representatives from employees with disabilities, and one external member who has extensive knowledge of disability issues. The charter of the Disability Council is to:

- Collect periodic feedback from various stakeholders on disability 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.

The Council will report annually on the various equal opportunity activities undertaken.

#### **2. Liaison Officer**

As per the mandate of The RPWD Act, the Liaison Officer 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 know 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 Head who would then present the progress report to the MD and the Disability 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.

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## **MAINTENANCE OF RECORDS**

Cleanmax 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 to provide information regarding any disability that they may have. An employee can edit the information at any time during their tenure. There will be no penalties imposed if they did not share information regarding their disability earlier. An employee who acquires disability can also edit and update the form. The information that an employee shares about their disability will be kept confidential. It will be maintained in a separate file and not in their 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 to facilitate obtaining any necessary support during an emergency.
- Government officials who are investigating compliance with the RPWD Act may be given information about an employee's disability.

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## **GRIEVANCE REDRESSAL**

Employees with disability have the right to file a complaint concerning any discrimination with the Grievance Officer who then reports to the Grievance Committee. 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 Grievance Committee shall consist of:

- A senior management official as the Chairperson 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).
- One external member from a disability organisation who is familiar with issues of discrimination on the basis of disability.

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

The Grievance Officer will maintain all records related to grievances. On investigation by the Grievance Officer & the Committee, if the employee against whom the complaint has been made is found guilty of discriminatory behaviour, they will be subjected to disciplinary actions. Possible action taken against the employee may include a reprimand, detraction of benefits for a definite or indefinite 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.

**ANNEXURE**

Liaison Officer	Mr./Ms.....
Disability Leadership Council	..... ..... .....
Grievance Officer	Mr./Ms.....
Grievance Committee	..... ..... .....