

## **DIVERSITY AND EQUAL OPPORTUNITY POLICY**

At Illuminar Media Private Limited (hereinafter referred to as “**the Company**”), we strive to create and maintain an environment conducive to engagement, increased performance and innovation and believe that diversity in the workforce is a key requirement to achieve that end. We are committed to achieving equality in employment opportunities and creating a work culture in which all employees are treated with respect and dignity. It is our endeavour to build a workforce which is well represented by all the sections of the society as we feel that, by doing so, we would gain higher accessibility to products and services enabling us to serve our customers better.

### **Introduction**

This Equal Opportunity Policy (hereinafter referred to as this “**Policy**”) is in accordance with the provisions of the Rights of Persons with Disabilities Act, 2016 (“**the Act**”) and the Rights of Persons with Disabilities Rules, 2017 (“**the Rules**”). To ensure the seamless implementation of this Policy, the Company has developed strategic plans and modified the relevant employee policies and processes as required by the law. The Policy has been devised under the guidance and with the assistance of relevant organisations as well as appropriate employee representatives.

### **Policy Statement**

The Company discourages any discrimination (which includes direct discrimination, indirect discrimination and denial of Reasonable Accommodation), bullying and harassment of people with disabilities. We continuously strive to ensure that all our facilities, technologies, information and privileges are accessible to all persons regardless of their disabilities.

We promote diversity in employment opportunities and all our decisions with regard to employment, career progression and any other benefits are solely based on skills, qualifications and merit. We ensure that there is no discrimination amongst our employees in compensation, training and employee benefits based on caste, religion, disability, gender, sexual orientation, race, colour, ancestry, marital status or affiliation with a political, religious or union organisation or any majority/minority group. 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 she/he may be evaluated fairly. Any information shared by employee on disability/medical condition will remain confidential.

### **Applicability**

The above 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 develop a disability(ies) 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.

### **1. Definitions as per the Act**

1. “**Accessibility Standard**” means the standards that every establishment should comply with relating to physical environment, transport and information technology, namely:

- a. standards prescribed for 'public building' by Ministry of Urban Development as specified in Harmonised Guidelines and Space Standards for Barrier Free Built Environment for Persons With Disabilities and Elderly Persons issued by Government of India;
  - b. standard for Bus Body Code for transportation system as specified in the notification of the Government of India in the Ministry of Road Transport and Highways, vide number G.S.R. 895(E), dated the 20th September, 2016 ;
  - c. website standard as specified in the guidelines for Indian Government websites, as adopted by Department of Administrative Reforms and Public Grievances, Government of India;
  - d. documents to be placed on websites shall be in Electronic Publication (ePUB) or Optical Character Reader (OCR) based pdf format: provided that the standard of accessibility in respect of other services and facilities shall be specified by the Central Government within a period of six months from the date of notification of these rules.
2. **"Person with Disability"** 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.
  3. **"Discrimination"** in relation to disability, means any distinction, exclusion, 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.
  4. **"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.

## 2. Facilities and Amenities

### a. Physical Infrastructure

The Company aims to ensure that our physical infrastructure (buildings, furniture, facilities and services in the building/campus and transportation) adheres to the Accessibility Standards within 2 months of circulating this policy, such as space allowance for wheelchairs, space allowance for crutches, space allowance for white cane users, etc. as prescribed by the Government of India from time to time. 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.

### Digital Infrastructure

It is the Company's 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 local IT support team or write to Liaison Officer.

### **3. List of positions identified**

In the Company, all positions are open for people with all types of disabilities. 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.

#### **Manner of selection**

##### **a. Vacancy advertisement and application**

- i. Wherever possible, all vacancies will be advertised internally and externally.
- ii. Wherever possible, vacancies will be notified to colleges, polytechnics and disability organisations.
- iii. All vacancy advertisements will include an appropriate short statement on equal opportunities for people with disabilities
- iv. 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.
- v. Application forms will be made available in alternate formats, based on request.

##### **b. Selection Process**

- i. All candidates considered for entry level positions up to the Manager level, must undergo an aptitude test. The test will examine logical reasoning on quantitative parameters and the English language. There is no aptitude test for positions above Manager level. Persons with disability who need exemptions or substitutions or Reasonable Accommodations for taking the test should contact the Liaison Officer.
- ii. Each interviewer is mandated to record her/his comments on the candidate's capability. Reasons for rejection must be objective and not related to the person's disability.
- iii.* Wherever possible, more than one person must be involved in the selection interview and recruitment process which will be executed in 2 months' time from the date of circulation of this policy, and all should have received appropriate training on the topic of equal opportunities for people with disabilities.

### **5. Other facilities**

a. Training and Career development

The Company will endeavour to provide course materials meant for induction and training in accessible formats on request.

The company has an accessible and inclusive appraisal process. Any employee/Manager requiring any Reasonable Accommodations for an appraisal process must place a request with the Liaison Officer at least two days in advance.

Disability Leave

An employee's request for extra leave, for a reason related to her/his disability, will be treated as a request for Reasonable Accommodation and will be evaluated accordingly.

The Company provides an option of unpaid special leave for a maximum period of three months for employees with disabilities who plan to undergo medical treatment. The leaves for Persons with Disability will be governed by the Company's leave policy. The procedure for availing the leave is detailed out in the company's Leave Policy which will be formulated within 2 months' of circulating this policy.

b. Travel, stay and transport

For official travel, Person with Disability 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. An employee can place a written/email request for this with the HR Department.

Accessibility

The Company shall provide assistive devices, barrier-free accessibility and other provisions for Persons with Disabilities.

c. Employee Engagement and social inclusion

The Company 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.

**6. Liaison Officer**

As per the mandate of the Act, the Company has appointed [•] as a Liaison Officer who will be responsible for taking initiative and providing the requisite support needed to realise the goals of an inclusive and accessible workplace.

The Liaison Officer is responsible for:

- a. 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.
- b. Ensuring that all employees are aware of this Policy and knows their duties and rights in relation to this Policy.

- c. Developing proactive strategies to prevent discrimination and harassment.
- d. Look after the recruitment process of Persons with Disabilities and make sure that the facilities and Reasonable Accommodation whenever necessary, after the recruitment, is provided to such 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.

#### **7. Grievance Redressal**

Employees with disability have the right to report any grievance concerning this policy, its implementation or discrimination with the Liaison Officer

#### **8. 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. The Company shall conduct awareness campaigns through appropriate means to promote inclusion of Persons with Disability.