



Policy on equal employment opportunity and anti-discrimination at workplace

Policy number	EC.005
Version	5
Policy effective date	April 1, 2008
Last reviewed on	October 01, 2024
Next review date	October 01, 2026

1. Purpose

- i) The policy ensures that Atul and its subsidiary, associate and joint venture entities provide equal employment opportunity, and do not indulge into any form of discrimination on the grounds of race, caste, creed, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, clan, ethnic origin, disability, political beliefs or any other category protected by the applicable law.
- ii) The policy is consistently applied throughout the period of employment of the individual right from the recruitment process till resignation | superannuation.

2. Scope

- i) The policy is applicable to all team members of Atul and its subsidiary, associate and joint venture entities.
- ii) The policy adheres to all terms and conditions of employment, including but not limited to, recruitment, hiring, compensation, benefits, transfers, layoffs, performance management, company-sponsored training programs (in-house or external) and any other social, cultural and recreational programs.

3. Definitions

- 3.1 Equal employment opportunity and discrimination: In accordance with Articles 16 and 16(2) of the Constitution of India, 1949, “no citizen shall, on grounds only of religion, race, caste, sex, descent, place of birth, residence or any of them, be ineligible for, or discriminated against in respect or, any employment or office under the State.”
- 3.2 Discrimination at workplace: Discrimination at workplace occurs when any individual | group of individuals falling under the scope of the policy is (are) treated unfavourably because of certain attributes which includes some or all of the following: i. Conduct that can be considered harassing, coercive or disruptive, including sexual harassment ii. Making offensive ‘jokes’ about another team member’s clan, ethnic background, colour, gender or disability (as defined in Person with Disability Act, 1995) iii. Expressing negative stereotypes about an individual | particular groups iv. Judging someone on their political or religious beliefs rather than their work performance v. Using selection processes based on irrelevant attributes such as ethnic or clan group, age, gender or disability rather than on knowledge, skills and merit vi. Using career progression process (increments and promotions) based on irrelevant attributes such as ethnic or clan group, age, gender or disability rather than on knowledge, skills and merit

4. Responsibility

The responsibility of exercising the Policy vests upon the following parties in their limited capacities:

- 4.1 Reporting manager is the first point of contact for the complainant | group of complainants.
- 4.2 The Human Resources Managers have the functional responsibility of assuring compliance with the Policy; developing, coordinating and implementing all programs; and reporting findings and progress.
- 4.3 Head – Human Resources is accountable to the Chairman and Managing Director of Atul and its subsidiary, associate and joint venture entities to oversee and promote this policy.
- 4.4 Equal Employment Opportunity and Anti-discrimination Committee ([Annexure I](#))

5. Policy statement

- 5.1 Atul and its subsidiary, associate and joint venture entities shall have fair, transparent and clear team member policies which promote diversity, inclusion and equality, in accordance with applicable law and other provisions of the Code of Conduct. These policies shall provide for clear terms of employment, training, development and performance management.
- 5.2 When recruiting, developing and promoting our team members, our decisions will be based solely on performance, merit, competence and potential.

6. Guidelines

6.1 The policy

It refers to the principle which ensures that all team members and potential team members of Atul and its subsidiary, associate and joint venture entities are treated equitably and fairly, regardless of their race, caste, creed, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, clan, ethnic origin, disability, political beliefs. Everyone has an equal chance when applying for jobs, promotions, training opportunities and in their working conditions. The following activities shall be conducted in a uniform manner:

- i) recruitment procedure and selection criteria, for appointment or engagement of a person as an team member
- ii) promotion, increment and transfer of an team member
- iii) training and development of an team member
- iv) terms of employment or any other team member related activity Atul and its subsidiary, associate and joint venture entities shall strive to create a workplace that is free from discrimination in their employment practices against any potential or existing team members, and shall not discriminate on:
 - a) age or other circumstances
 - b) skin colour
 - c) cultural or social beliefs such as religious
 - d) educational background
 - e) race, ethnicity or nationality
 - f) spiritual, traditional or customary beliefs
 - g) political opinion
 - h) physical features
 - i) gender identity and expression
 - j) marital status
 - k) pregnancy or judging the impacts of potential pregnancy on decisions | breastfeeding
 - l) sexual orientation
 - m) health or physical disability or impairment
 - n) medical record (unless declared medically unfit in view of the nature of job for which the concerned individual | group of individuals has | have been shortlisted)
 - o) critical illnesses and ailments, for example, HIV, vitiligo etc

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- p) family responsibilities
- q) trade union membership
- r) reserve disciplinary forces, for example, police

6.2 Equal opportunity for persons with disability

In accordance with the provisions of the Rights of Persons with Disabilities Act, 2016 and Rules, it is the Policy on equal employment opportunity and antidiscrimination to ensure that the work environment is free from any discrimination against persons with disabilities. Further, Atul and its subsidiary, associate and joint venture entities (the Company) will take all actions to ensure that a conducive environment is provided to persons with disabilities to perform their role and excel in the same. The Company will build systems and processes to ensure:

- i) that appropriate facilities and amenities are provided to persons with disabilities to enable them to effectively discharge their duties in the establishment.
- ii) that provision is made for an accessible environment and of availability of assistive devices as required.
- iii) that the Human Resources department will ensure a Liaison officer is designated to oversee the provision of required facilities | amenities including the process of recruitment for persons with disabilities and such Liaison Officer shall be part of the Human Resources team reporting to the Head - Human Resources of the Company.
- iv) that a grievance redressal mechanism for addressing the matters related to the employment of persons with disabilities is available.
- v) that no opportunity is denied to persons with disabilities, merely on ground of disability.
- vi) Individuals with disabilities who apply or team members who believe themselves to be covered by the Rights of Persons with Disabilities Act, 2016, should contact the respective Bu | Fu Human Resources manager. Any information obtained is voluntary, will be kept confidential, and will be used in accordance with applicable laws. Refusal to provide information will not subject an team member or applicant to any adverse treatment. Employee and applicants will be protected from coercion, intimidation, interference, discrimination or retaliation for filing a complaint or assisting in an investigation under the Act.

6.3 Complaint redressal procedure

- a. Individual or group of individuals who becomes aware of harassment, unfair discrimination at workplace and (or) denial of employment on grounds other than merit, the affected individual | group of individuals can file a complaint to the Equal Employment Opportunity and Anti-discrimination Committee (EEOC) in the prescribed form ([Annexure II: Complaint form for denial of equal employment opportunity and unfair discrimination at workplace](#)).
- b. Eligible applicants may file a complaint (Annexure II) to the Chief Legal Officer through a registered post which can be addressed at:
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Chief Legal Office, Corporate East Site, Atul Ltd, Atul 396 020

- c. However, before an official complaint is filed through filling up [Annexure II](#), the complaint has to be addressed verbally first to the respective reporting manager (L+1) involving concerned Business | Function Human Resource manager who may escalate the concern to General Manager - Human Resources for discussion. The parties involved in this discussion shall consist of the General Manager - Human Resources, concerned Business | Function HR manager, concerned L+1 and the complainant | representative(s) from the group of complainants. If the L+1 is involved in the allegation, the complaint must be referred to Head of the Department (HOD) and the Business | Function HR manager. The reason why the complainant(s) should first verbally address (free of any requirement as to filing the complaint in [Annexure II](#)) the concern of unfair discrimination or denial of employment on the grounds other than merit is because the details of the concerns stated in the form will be treated with utmost seriousness and any report filed in negligence of truth or falsity, may subject the complainant(s) to appropriate disciplinary action.

d. Process of filing and administering a complaint:

Process	Action	Responsibility
Step 1: Identification of the concern	The complainant(s) to identify the context of discrimination and (or) denial of equal employment opportunities	<ul style="list-style-type: none">Complainant(s)
Step 2: Preliminary verbal discussion	Before filing a complaint to Equal Employment Opportunity and anti-discrimination Committee (EEOC), the complainant(s) to discuss the concern with L+1, Bu Fu HR manager and General Manager - HR [to be read in reference with 6.3(b)] within 5 days from the date of critical incident	<ul style="list-style-type: none">Complainant(s)L+1Bu Fu HR managerGeneral Manager - HR
Step 3: Filing of complaint in the prescribed form (Annexure II)	Complainant(s) to file an official complaint to EEOC in the prescribed form (Annexure II) and submit the same to respective Bu Fu HR manager	<ul style="list-style-type: none">Complainant(s)Bu Fu HR manager

Step 4: Appointment of Investigation Officer	Bu Fu HR manager to forward the official complaint received from the complainant(s) to Head - Human Resources ; Head - Human Resources to appoint an independent and non-affected HR manager as an Investigation Officer	<ul style="list-style-type: none"> • Bu Fu HR manager • EEOC • Head - Human Resources Investigation Officer
Step 5: Investigation Officer to submit the report of significant findings	Investigation Officer to carry out detailed investigation to gather details in view of the concern raised by the complainant(s) and submit the report to the Head - Human Resources	<ul style="list-style-type: none"> • Investigation Officer • Head - Human Resources
Step 6: EEOC to evaluate investigation report and hearing ¹	Head - Human Resources to forward the investigation report to EEOC Chairman (Annexure I) and EEOC to conduct hearing which involves the complainant(s), the defendant(s) and any other such individuals whom EEOC believes to have relevant information knowledge pertaining to the charges; EEOC may also seek legal counsel if needed	<ul style="list-style-type: none"> • Head - Human Resources EEOC • Complainant(s) • Defendant(s) • Legal counsel (if appointed) • Any such individual(s) as stated by EEOC
Step 7: Substantiation of charges by EEOC and Committee recommendations	Based on the hearing, EEOC to determine whether the charges can or cannot be substantiated and recommend appropriate action (remedial, disciplinary or legal) to the Head - Human Resources	<ul style="list-style-type: none"> • Head - Human Resources • EEOC

¹hearing will be based on evidences (oral testimony of witnesses, documents, Company records, objects, photographs, audio and (or) video tapes and depositions) relevant to the charges; both parties

(complainant and defendant) to be heard by the EEOC; EEOC may also seek appropriate legal counsel if needed.

6.4 Timelines

Atul and its subsidiary, associate and joint venture entities through and internal Equal Employment Opportunity and Anti-discrimination Committee (EEOC) will investigate all complaints immediately and will work towards the prompt resolution and prevention of discriminatory acts and practices. The first round of investigation and conclusion shall be arrived at within 10 working days from the date of filing of the complaint.

6.5 Confidentiality and Right to Privacy

Atul and its subsidiary, associate and joint venture entities (the Company) shall preserve the confidentiality of all individuals involved in a discrimination complaint. The preservation of confidentiality may be affected by the employer's duty to prevent discrimination in (at) the Company and by the alleged respondent's right to know the nature of the complaint being made against them and who has made it so that they can respond. If the investigation fails to find evidence to support the complaint, no documentation concerning the complaint will be placed on the file of the respondent. The Company will retain all documentation for 12 months for informational purposes in the event that there is an internal appeal or a complaint filed with an outside agency.

6.6 Outcome and remedies

Atul and its subsidiary, associate and joint venture entities will act swiftly to ensure that the discriminatory practice is stopped as soon as possible and may remedy the situation in a number of ways. Where the investigation determines that discrimination has occurred or the matter has been successfully mediated, outcomes may include moving the respondent to another department, changing the respondent's job duties, or a letter of apology. Actions taken to remedy a discriminatory situation should not have a negative effect on the complainant.

7. Policy amendments and authorisation

The above policy guidelines are subject to review and modification from time to time at the discretion of the Management. The decision of the Head – Human Resources shall be final and conclusive in the event of an interpretation of a guideline mentioned in the policy.

8. Policy change history

Version	Review date	Description of changes made
1	April 1, 2008	Introduction of the policy
2	July 30, 2018	Overall review and updation of the Policy
3	August 12, 2019	Review the policy
4	September 09, 2020	Review the policy
5	September 09, 2022	Review the policy
6	October 01, 2024	Review the policy

Annexure I
Equal Employment Opportunity and Anti-discrimination Committee

No.	Name	Designation	Contact details	
			E-mail address	Extension number
1	Mr Lalit Patni	Chairman	lalit_patni@atul.co.in	5649
2	Mr Deepak Ahuja	Member	deepak_ahuja@atul.co.in	2398
3	Ms Purni Vachharajani	Member	purni_vachharajani@atul.co.in	5603
4	Others ¹	-	-	-

¹Other members include managers of Atul Ltd and its group companies, lawyers, legal counsellors etc as appointed by the Equal Employment Opportunity and Anti-discrimination Committee, Head - Human Resources and the Chairman and Managing Director of Atul Ltd and its group companies.

Annexure II

Complaint form for denial of equal employment opportunity and unfair discrimination at workplace

Details of the Complainant (to be filled by the individual filing the complaint)

Name of the complainant:

Residential address:
.....

Contact details: Mobile: Home landline:

E-mail: Office landline:

I prefer to be contacted on: Mobile ☐ Home landline ☐ E-mail ☐ Office landline ☐

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Details of the Complainant (to be filled in by the respective Business | Fu Human Resources Manager)

Date of hire: DD – MM – YYYY Job function:

Department: Bu | Fu:

Work location:

Atul: East Site ☐ North Site ☐ West Site ☐

Mumbai: Dadar ☐ Goregaon ☐

Maharashtra: Tarapur ☐ Thane ☐ Ambarnath ☐

Other locations: Ahmedabad ☐ Ankleshwar ☐ Delhi ☐ Jodhpur ☐

Any other:

Details of the Reporting Manager (L+1) of the Complainant

Name: Team member ID:

Complaint (to be completed by the Complainant)

Date of unfair discrimination or failure to follow equal employment opportunity: DD – MM – YYYY

Basis of unfair discrimination or failure to follow equal employment opportunity (tick as applicable)

Race ☐ Skin colour ☐ Religion ☐ Gender ☐ Sexual orientation ☐

Disability ☐ Nationality ☐ Marital status ☐ Caste ☐ Genetic characteristics ☐

Diseases | illnesses ☐ Gender identity ☐ Any other:

Continued...

Describe in detail the alleged discriminatory act(s) or alleged failure to follow equal opportunity standards, indicating place, name and job title of person(s) involved (additional pages may be added to this form)

In view of the above mentioned details, what corrective actions are you seeking, if any?

Name of the complainant

Signature of the Complainant:

Date: DD – MM – YYYY