

## **Equal Opportunity and Anti-Discrimination Policy**

### **Preamble and Overview:**

Palepu Pharma Distributors Private Limited is fully committed to upholding equality and diversity in our workplace, as mandated by applicable statutory laws. We firmly adhere to the principles of non-discrimination in all aspects of employment, including recruitment, promotion, training, and compensation.

Our policy strictly prohibits discrimination based on nationality, race, color, religion, caste, gender identity/expression, sexual orientation, disability, HIV positive status, union membership, pregnancy, social origin or status, indigenous status, political orientation, age, marital status, or any other personal characteristic or status.

In accordance with The Rights of the Persons with Disabilities Act 2016, Transgender Persons (Protection of rights) Act, 2019, and Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Act 2017 (HIV/AIDS Act), we are dedicated to ensuring that individuals with disabilities, transgender persons, and individuals with HIV/AIDS are treated with dignity and provided with equal opportunities.

To oversee the effective implementation of our policy, we have appointed POSH and HR Team for ensuring compliance with statutory requirements and addressing any concerns or grievances related to discrimination.

By adhering to these statutory laws and our internal policies, we strive to create an inclusive and supportive work environment where all employees are valued and respected.

### **Scope:**

At Palepu Pharma Distributors Private Limited, our policy extends to all job applicants, contract workers, full-time/part-time employees, regardless of nationality, race, color, religion, caste, gender identity/expression, sexual orientation, disability, HIV positive status, union membership, pregnancy, social origin or status, indigenous status, political orientation, age, marital status, or any other personal characteristic or status. This policy also encompasses individuals with disabilities, including those who may acquire disabilities during their tenure, as well as members of the LGBT+ community. At Palepu Pharma Distributors, we are committed to fostering an inclusive and supportive environment for all members of our team.

## **Definitions:**

**Discrimination** in relation to disability, gender identity, sexual orientation or HIV status means any distinction, exclusion, restriction based on disability/gender identity/sexual orientation or HIV status 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 or any other discrimination defined under sec. 2(h) of the RPWD Act 2016, sec. 2(d) of the HIV/AIDS Act 2017 and sec.3 of the Transgender Persons (Protection of Rights) Act 2019 in relation of person with disability, protected person and transgender person respectively.

**Harassment** 'Harassment' is a form of discrimination. It includes any unwanted physical or verbal behaviour that offends, humiliates or embarrasses a person. Harassment may take the form of words, gestures or actions which tend to annoy, alarm, abuse, demean, intimidate, belittle, humiliate or embarrass another or which create an intimidating, hostile or offensive work environment Harassment includes but not limited to

- a. Obscene acts, gestures, singing, recitation or utterance of any obscene song, ballad or words
- b. Assault or use of criminal force or abusive language
- c. Use of name-calling (use of offensive names), slurs, threats
- d. Display of obscene object
- e. Coercing to meet any unlawful demand
- f. Publishing, transmitting or sharing private or morphed images against the wish of the person
- g. Prejudiced remarks or tasteless jokes about individual's age or sexual orientation or gender identity or any other personal characteristics
- h. Intentionally socially alienating people based on nationality, race, colour, religion, caste, gender identity/expression, sexual orientation, disability, HIV positive status, union membership, pregnancy, social origin or status, indigenous status, political opinion, age, marital status or any other personal characteristic or status

## **Sexual Harassment**

'Sexual Harassment' includes unwelcome sexually tinted behavior, whether directly or by implication, such as

- (i) Physical contact and advances,
- (ii) Demand or request for sexual favours
- (iii) Making sexually coloured remarks
- (iv) Showing pornography
- (v) or any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

The following circumstances, among other circumstances, if they occur or are present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:

1. Implied or explicit promise of preferential treatment in employment;
2. Implied or explicit threat of detrimental treatment in employment;
3. Implied or explicit threat about present or future employment status;
4. Interference with work or creating an intimidating or offensive or hostile work environment;
5. Humiliating treatment likely to affect the employee's health or safety

**LGBTQ+** - Lesbian Gay Bisexual Transgender Queer (plus sign meant to cover anyone else in the spectrum)

**Gender Identity:** A person's internal, deeply held sense of their gender.

**Gender expression:** External manifestation of gender, expressed through a person's name, pronouns, clothing, haircut, behavior, voice and/or bodily characteristics.

- i. **Agender:** A person who does not identify with any gender. They may also call themselves as genderless.
- j. **Androgynous:** A person whose gender expression combines aspects of typically masculine and feminine characteristics
- k. **Bigender:** A person who experiences two distinct gender identities either simultaneously or one gender at a time.
- l. **Genderfluid:** A person who rejects the binary of a man and a woman to describe their gender. They may feel more like a man one day and more like a woman on another and neither or both on other days.
- m. **Gender non-confirming:** A gender identity that does not fit typical cultural masculine or feminine norms
- n. **Genderqueer:** Someone who queers gender-They may express a

combination of typical masculine and feminine traits or neither. It is different from gender fluid as they may not experience any change in their identity from day to day.

- o. **Non-Binary:** A person who rejects the binary of a man or a woman and their gender identity expresses a combination of masculinity and femininity or neither
- p. **Male to Female** A person who was assigned male at birth and transitions to female through surgery.
- q. **Female to Male:** A person who was assigned female at birth and transitions to male by undergoing surgery.
- r. **Pangender:** Someone who identifies as having more than one gender or all genders
- s. **Transgender person** means a person whose gender does not match with the gender assigned to that person at birth and includes trans-man or trans-woman (whether or not such person has undergone Sex Reassignment Surgery or hormone therapy or laser therapy or such other therapy), person with intersex variations, genderqueer and person having such socio-cultural identities as kinner, hijra, aravani and jogta.
- t. **Person with intersex variations** means a person who at birth shows variation in their primary sexual characteristics, external genitalia, chromosomes or hormones from normative standard of male or female body. This may be apparent at birth or may become so later in life. An intersex person may identify as male or female or as neither. Intersex status is not about sexual orientation or gender identity.
- u. **Transition:** The process of changing one's gender from the sex assigned at birth to one's gender identity. There are many ways to transition. For some people, it is a complex process that takes place over a long period of time, while for others it is a one- or two-step process that happens more quickly. Transition may include "coming out" (telling family, friends, and coworkers); changing the name and/or sex on legal documents; and, for many transgender people, accessing medical treatment such as hormones and surgery.
- v. **Person with Disabilities(PWD)** As an equal opportunity employer, we are open to employing people with all types of disabilities as mentioned in RPWD Act. However, going by nature of jobs and considering the process & safety hazards in a manufacturing set-up, and looking at the preparedness of the organization we will consider following physical disabilities in Phase 1 out of the specified disabilities:
  - a. Locomotor disability (Upper and lower limb)
  - b. Visual disability
  - c. Hearing disability

## **Specified disabilities: Please refer to Annexure II**

**Person with benchmark disability:** As per RPWD Act, 2016 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.

HIV means Human Immunodeficiency Virus, which attacks and weakens the body's immune system making the HIV-positive person susceptible to life threatening conditions or other conditions.

"protected person" means a person who is- (i) HIV-Positive; or (ii) ordinarily living, residing or cohabiting with a person who is HIV-positive person; or (iii) ordinarily lived, resided or cohabited with a person who was HIV-positive;

Reasonable accommodation means necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden in a case, to ensure persons with disabilities, pregnant persons or transgender persons enjoy or exercise equal rights as others.

Palepu Pharma Distributors will make reasonable accommodation whenever necessary for person with disabilities, pregnant persons, and members of the trans community as per the RPWD Act and Transgender Persons (Protection of Rights) Act, 2019.

### **Policy Statement:**

Palepu Pharma Distributors is committed to eliminating all forms of discrimination (Including direct and indirect discrimination, denial of accommodation or facilities needed), bullying, harassment of people with disabilities, women, people of the LGBT+ community or any other person.

We proactively encourage candidates from the diverse workforce (Including women, people with disabilities, members of the LGBT+ community, tribal community, local communities) to apply for identified suitable positions. Our decisions for employment, career progression, training or any other benefits are solely based on merit. We follow an inclusive evaluation process by ensuring that diverse candidates are provided with suitable facilities to

facilitate the process of evaluation.

Person with disabilities, pregnant persons and members of the transgender community are provided with reasonable accommodation and/or digital infrastructure for fair evaluation. Any information shared by the candidates or employees with regards to their disability /medical condition /gender/ sexual orientation/ community/religion/caste /HIV status will be strictly confidential and not be disclosed without prior consent of the person.

An employee who acquires a disability during employment tenure will return to work in the same rank as before. In case the employee is unable to perform the job, that they were undertaking before the disability, organization will reskill them and arrange for a suitable position elsewhere in the same rank.

An employee who chooses to transition at workplace will be addressed with their new identity and the HR team will enable the team members to positively embrace and support the transition at workplace. The employees who choose to transition will return to the same work and same rank.

#### **Facilities and Amenities:**

**Restroom and washroom Accessibility:** All job applicants, apprentices, contract workers, full time/part time employees, interns/trainees have a right to safe and appropriate restroom and washroom, facilities, including the right to use a restroom that corresponds to the employee's gender identity.

#### **List of positions identified for person with disabilities:**

At Palepu Pharma Distributors, positions have been identified for person with disabilities based on the suitability of the person to perform and carry out the roles and responsibilities. The hiring is purely based on merit and candidates are evaluated based on their skills and competence. At equal level of merit, a person with disability will be given preference.

#### **Career and Development:**

All employees will be given equal opportunities to apply and get selected for positions (based on minimum qualification and required experience as per promotion policy). There will be no discrimination based on nationality, race, colour, religion, caste, gender identity/expression, HIV status, pregnancy, sexual orientation, disability, union membership, social origin or status, indigenous status, political orientation, age, marital status or any other personal characteristic or status.

#### **Equal Remuneration and benefits:**

There will be no discrimination on remuneration based on nationality, race, colour, religion, caste, gender identity/expression, HIV status, pregnancy, sexual orientation, disability, union membership, social origin or status, indigenous status, political orientation, age, marital status or any other personal characteristic or status.

### **Maintenance of records:**

Palepu Pharma Distributors understands and respects that sharing information about one's disability /gender identity is a personal preference. The 'person with disability', 'person with benchmark disability' and 'person with disability having high support needs' defined under the Rights of Persons with Disabilities Act 2016 or employees who have a disability or medical condition and wish to share the information can fill the Self-Identification to disclose their disability to HR Team. Also, given that disability or medical ailment can be acquired at any point, an employee can inform or edit the information in the communicate or inform any time.

The 'protected person' defined under the HIV & AIDS Act 2017 may fill the voluntary disclose HIV positive status HR Team. During the period of employment at the company, employee can communicate or inform such information any time. Employees who are citizens of India can update the certificate of disability issued by certifying authority of the appropriate Govt.

Employees can opt for declaring their gender identity or disability status at the time of recruitment or appointment. Employees may exercise the right to not disclose their gender identity at workplace through prefer not to disclose option, in which case the gender identity will be not disclosed".

In case of Transgender Persons who are citizens of India, concerned persons can upload their transgender certificate issued by District Magistrate or Identity Card issued by the authority of the concerned Appropriate Government which would help them in availing government benefits. Certain types of records, like those relating to payroll and retirement accounts, may require a legal name change before the person's name can be changed in case of transition. As quickly as possible, we will make every effort to update any photographs at the transitioning employee's workplace so the transitioning employee's gender identity and expression are represented accurately.

Confidentiality of data will be maintained with certain exceptions like data being made available for HR, security, and other relevant functions for ensuring reasonable accommodations.

### **Grievance redressal**

The organization will follow the same procedure for inquiring and investigating the complaints or concerns raised by employees with disability

as for other employees. However, necessary reasonable accommodation will be provided to employees with disabilities to effectively participate in the investigation process. For example, sign language interpreter for persons with deafness, accessible venue for persons with locomotor disability, etc

If an employee raises a concern, they will not be under any risk in the form of retribution or retaliation. The company will not tolerate any harassment or victimization (informal pressures) against any employees raising concerns who have a genuine case and will take appropriate action accordingly.

All grievances related to prevention of sexual harassment at workplace (POSH) will be governed by the POSH policy of Palepu Pharma Distributors and handled by our Internal Committee. Any proven case of harassment proven will command punitive action with respect to consequence management guidelines (for sexual harassment) or domestic inquiry guideline (any other form of harassment) as the case may be.

For grievances, employees can write to HR Team, Complaint Officer, POSH chairperson. For all complaints, the confidentiality of the complainant will be respected, keeping in mind the sensitivity of the subject matter.

### **Complaint Officer**

As per the Transgender Persons (Protection of Rights) Act 2019 and the HIV & AIDS (Prevention and Control) Act 2017 respectively, Selected members of POSH Committee and HR team members have been appointed by the Palepu Pharma Distributors as complaint officer, who will be responsible for providing requisite support to realize the goals of an inclusive and discrimination free, trans friendly workplace in relation to the 'transgender person' and 'protected person' respectively defined under the above said Acts.

The Complaint Office shall be responsible for the adherence of compliance under the said Acts, inter alia, ensure w.r.t,

- To investigate and to resolve the cases of complaints or grievances received from transgender employees, protected persons & such other trainees, candidates, interns, and contract workers.
- To support in implementing policy and action plan for making workplace and IT systems accessible and inclusive for transgender employees, protected persons & such other trainees, candidates, interns, and contract workers.
- Proactively working towards prevention of discrimination or harassment of employees, trainees, interns, contract workers and candidates.

**Governance Framework:**

POSH and HR Team is responsible for ensuring the establishment operates in compliance with the provisions of this policy and they will take the lead in implementing the programme and for planning, monitoring, reviewing the programme's progress to ensure compliance to this policy and they will present the report to Company Secretary quarterly.

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