

# EQUAL OPPORTUNITY POLICY

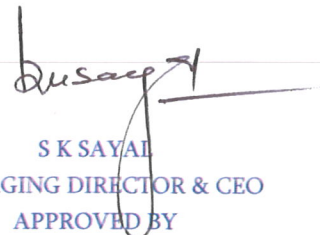
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### 1. Preamble and Overview

At “Bharti Real Estate”, 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 “Bharti Real Estate”, workforce diversity is a business imperative. We will strive to ensure that our workforce is representative of all sections of the society. This Equal Opportunity Policy is in accordance with the provisions of The Rights of Persons with Disabilities Act, 2016.

### 2. Objective

The objective of this policy is to ensure seamless implementation of this policy, Bharti Real Estate has created a strategic plan and modified the related employee policies and processes. The CEO has the overall responsibility for the effective operation of the Equal Opportunity Policy. Liaison Officer, Persons with Disabilities, will be in charge for its implementation.

### 3. Scope

The policy is applicable to all persons with disabilities, they could be job applicants, employees, interns/trainees, and it also covers those employees who acquire disability during their work tenure. The Policy applies to all aspects of employment, be it recruitment, training, working conditions, salaries, transfers, employee benefits and career advancement of disabled employees of Bharti Real Estate. For the purpose of this policy, the following people are deemed to be ‘employees’:

- Those who are on the employment rolls of the Company
- Those who are on the employment rolls of the subsidiary companies

### 4. Specified Disabilities

“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. “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. “Specified disabilities” are the disability categories mentioned in the Schedule of the Act. There is also “any other category”, which allows Central Government to add any other disability by issuing a notification. The disability categories as mentioned in the Schedule are:

- Locomotor Disability
- Muscular Dystrophy
- Leprosy Cured
- Dwarfism

- Cerebral Palsy
- Acid attack Victim
- Low Vision
- Blindness
- Deaf
- Hard of Hearing
- Speech and Language Disability
- Intellectual Disability
- Specific Learning Disability
- Autism Spectrum Disorder
- Mental illness
- Chronic Neurological Conditions
- Multiple Sclerosis
- Parkinson's Disease
- Hemophilia
- Thalassemia
- Sickle Cell Disease
- Multiple Disabilities
- Any other category (as may be notified by the Central Government.)

**“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, 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 other employees.

## 5 Facilities and Amenities

### 5.1 Physical Infrastructure

“Bharti Real Estate” aims to ensure that our physical infrastructure (buildings, furniture, facilities and services in the building/campus) adheres to the accessibility Standards given in The Harmonised Guidelines and Space Standards for Barrier Free Built Environment for Persons with Disabilities and Elderly Persons, 2016 and the National Building Code, 2016.

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.

## 5.2 Digital Infrastructure

It is “Bharti Real Estate’s” continuous endeavor to ensure that all our documents, communication and information technology systems adhere to the accessibility standards.

The Standards for Information and Communication Technology as given in the RPWD Rules 2017 are:

Website Standards: Guidelines for Indian Government Websites (GIGW), as adopted by Department of Administrative Reforms and Public Grievances, Government of India. Documents Standards: Electronic Publication (ePUB) or Optical Character Reader (OCR) based pdf formats. 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.

## 5.3 Reasonable Accommodation

“Bharti Real Estate” 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. “Bharti Real Estate” has formulated Reasonable Accommodation Request Form and Reasonable Accommodation Guidelines in which the process for availing accommodations have been further detailed out.

## 6. Identify List of Positions for Disabled Persons

In “Bharti Real Estate” 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.

## 7 Other facilities

### a. Training and Career Development

“Bharti Real Estate” 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 Liaison Officer at least two days in advance.
- The establishment conducts yearly training programs on ‘Objective Performance Appraisal Process’ for all Managers

### b. 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.
- “Bharti Real Estate” provides an option of unpaid special leave for a maximum period of one month for employees with disabilities who plan to undergo medical treatment.

### c. Travel, Stay and Transport

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

### d. Employee Engagement and Social Inclusion

- “Bharti Real Estate” will endeavor 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.

## 8. Governance Framework

The CEO 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 program and is responsible for planning, monitoring and reviewing the program’s progress to ensure compliance with the Policy.

## 9. Liaison Officer

As per the mandate of The RPWD Act, “Bharti Real Estate” has to be 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 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.

## 10. Maintenance of Records

“Bharti Real Estate” 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 in order to give information regarding any disability that she/he may have. An employee can edit the information at any time during her/his tenure. There will be no penalties imposed because she/he did not share information regarding her/his disability earlier. An employee who acquires disability can also edit and update the form.

The information that an employee shares about her/his disability will be kept confidential. It will be maintained in a separate file and not in her/his personal file. Exceptions to the confidentiality clause:

- i. Managers/Supervisors may be given information about an employee’s disability for allowing/ providing any accommodations.
- ii. Security personnel may be given information about an employee’s disability so as to facilitate obtaining any necessary support during an emergency.
- iii. Government officials who are investigating the compliance with The RPWD Act may be given information about an employee’s disability.

## 11. Grievance Redressal

Employees with disability have the right to file a complaint concerning any discrimination with the ombudsperson 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.

**12. Deviations / Exceptions**

Any deviations from this policy would require prior approval from the HR Head. Management reserves the right to modify or terminate this policy without prior notice.

**13. Policy Owner**

This policy is owned by the Head – HR.

**14. Employee Connect**

In case of any queries, please feel to reach out [hr@bhartiirealty.com](mailto:hr@bhartiirealty.com)