

# **EQUAL OPPORTUNITY POLICY**

GEM Enviro Management Ltd.



## EQUAL OPPORTUNITY POLICY

Document Name	Equal Opportunity Policy
Organization	GEM Enviro Management Ltd.
Last Updated on	1 <sup>st</sup> December, 2023
Version approved by	Mr. Sachin Sharma
Effective Date	1 <sup>st</sup> April, 2022

## Preamble

GEM ENVIRO MANAGEMENT LTD. (hereinafter referred to as ‘GEM’/’Organization’) is an equal opportunity employer. The purpose of this policy is to prohibit discrimination and harassment of any type and provide equal employment opportunities to employees and applicants with regards to race, color, religion, gender, sexual orientation, pregnancy, age, disability status, genetic information, protected veteran status, or any other characteristic protected by law. The organization aims to be an inclusive employer that provides equal opportunities to persons from all sections of society including Persons with Disabilities (PWD) as defined in the ‘Rights of Persons with Disabilities Act, 2016 (“Act”)’.

## 1. Scope

This Equal Opportunity Policy applies to all prospective and current employees of the Organization, as well as contractors and visitors, who are vulnerable to discriminatory treatment due to certain individual characteristics.

## 2. Coverage

The policy of equal employment opportunity (EEO) and anti-discrimination applies to all aspects of the relationship between the organization and its employees, including:

- Recruitment.
- Employment.
- Promotion.
- Transfer.
- Training.
- Working conditions.
- Wages and salary administration.
- Employee benefits and application of policies.

The EEO policy also applies to the selection and treatment of independent contractors, personnel working on our premises who are employed by temporary agencies, and any other persons or firms doing business for or with GEM.

## 3. Definitions

- The “**Act**” shall mean the Rights of Persons with Disability Act, 2016.
- “**Organization**” means “GEM ENVIRO MANAGEMENT LTD.”
- **Discrimination:** discrimination in relation to disability means any distinction, exclusion, or restriction based on disability which has the 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”** shall have the meaning assigned to it under the Act, i.e.; 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.
- **“Person with Disability”** shall have the meaning assigned to it under the Act, i.e.; person with a long-term physical, mental, intellectual, or sensory impairment which hinders her/his full and effective participation in society equally with others.
- **“Policy”** shall mean this “Equal Opportunity Policy” adopted by the organization.

## 4. Commitment:

The organization’s relationship with all its Employees shall be based on principles of equal opportunity and fair treatment. Discrimination by the organization (or its Employees) on grounds like age, sex, gender, disability, ailment, religion, race, nationality, social or ethnic origin, color, sexual orientation, political opinion, and other personal characteristics unrelated to the inherent requirements of the job, is strictly prohibited and shall be subject to disciplinary action.

The organization shall not discriminate with respect to any aspect of the employment relationship including the hiring/selection process, promotions, transfers, provision of training opportunities, compensation, employee benefits, termination or retirement policies, and disciplinary practices. Further, regarding transgender persons, the organization shall maintain the confidentiality of the gender identity of the employees except where the Organization or its representatives is required to disclose such information to government officials or in order to cater to or provide support to such employees.

## 5. Selection Process

The organization adopts a transparent selection process guided by the merit of the candidate. The organization shall review the selection criteria from time to time to ensure that it is not discriminatory against any section of the society including persons with disabilities. Upon request, application forms shall be made available in alternative formats that are convenient for persons with disabilities.

## 6. Facilities and Amenities

The organization shall as far as possible, endeavor to provide such facilities and amenities to Persons with Disabilities and Transgender Persons to enable them to effectively discharge their duties. The organization shall consider the specific and special needs of Persons with Disabilities

and Transgender Persons employed by it and ensure that its facilities (including physical infrastructure, information and communication technology, safety and security, and transportation system, if any, provided by the Organization) are easily accessible.

## **7. Physical Infrastructure**

The Organization shall endeavor to ensure that it provides barrier-free accessibility to Persons with Disabilities and that its physical infrastructure is disabled-friendly. Further, the Organization shall endeavor to ensure that it provides infrastructural facilities, such as unisex toilets, to transgender persons. Towards this end, the Organization shall, on a continuous basis, liaise with service providers, facility managers, or such other appropriate persons who manage the premises within which its offices are located. On a case-to-case basis, the organization may also opt to provide assistive devices for the convenience of Persons with Disabilities. Employees facing accessibility issues in relation to the physical infrastructure of the Organization or regarding any other issue, are requested to report the same to the Liaison Officer.

## **8. Transportation System**

Transportation facilities, if any, provided by the Organization shall adhere to the accessibility standards prescribed under the Act. Employees facing accessibility issues are requested to report the same to the Liaison Officer.

## **9. Other Facilities**

### **a) Special leave**

Upon request by a Person with a Disability, the Organization, may, at its discretion, allow special leave to such persons if such leave is required in connection with her/his disability.

### **b) Reasonable Accommodation**

The Organization may at its discretion offer Reasonable Accommodation to Persons with Disabilities to enable them to discharge the essential functions of their position in the Organization. What constitutes Reasonable Accommodation may differ from case to case and shall be up to the discretion of the Organization.

### **c) Training and career development**

The Organization shall ensure that all workshops, orientations, or materials provided for post-recruitment and pre-promotion training of its employees are consistent with the needs of persons with disabilities. Depending on the role and special needs of persons with disabilities, the organization may at its discretion, give preference to such persons in matters of transfers and posting and, where applicable, allotment of residential accommodation.

## **10. Complaints**

Should an employee believe they have experienced harassment, bullying, or discrimination, they may either attempt to resolve the matter informally or invoke the formal complaint procedure under the ‘Grievance Redressal Procedure’ to pursue their complaint. All cases will be taken seriously, dealt with quickly, and treated with the utmost confidence.

## 11. Grievance Redressal & Harassment Prevention

As per the Disability Act, GEM has appointed **Mr. Puneet Srivastava** as the Liaison Officer, who is responsible for taking initiative and providing the requisite support needed to realize the goals of an inclusive and accessible workplace and reasonable accommodation. The Liaison officer can be reached at mobile no. – (+91) 9599941946.

**The Liaison Officer is responsible for ensuring:**

- A disable-friendly workplace;
- All employees are aware of this policy and know their duties and rights in relation to the policy;
- Developing proactive strategies to prevent discrimination and harassment.

## 12. Responsibility and Administration of the Policy

GEM’s management has overall responsibility for this Policy. However, the Liaison Officer has been delegated the day-to-day responsibility for administering, tracking, communicating, and reviewing this policy. HR department would advise the executives of the organization regarding;

- Application of this policy and
- Application of other HR employment-related policies in relation to equality and diversity issues

Each department head of GEM shall assist in the implementation of this Policy by disseminating it within their departments and creating respect for the seriousness of compliance with this policy. All managers must set an appropriate standard of behaviour and lead by example. They should ensure that their subordinates adhere to the Policy and organization’s aims and objectives with regard to this policy. Managers will be given appropriate training on the best practices regarding ‘equal opportunity policy’. Liaison Officer has overall responsibility for such training.

No retaliatory action will be taken against any individual for raising concerns as regards this policy. However, any such reporting by an employee, if found to be in bad faith or in a false or frivolous manner, will be considered a violation of the code of conduct, and such employee may be subject to disciplinary action.

## 13. Reference to Other Policies

Relevant sections of GEM’s following policies shall also be applicable, as required;

- i) Code of Conduct for Directors and Senior Management

**GEM ENVIRO MANAGEMENT LTD.**

**Unit no. 203, Central Square, Plaza 3**

**M.L. Khurana Marg, Bara Hindu Rao**

**Delhi – 110006**

**<https://gemrecycling.com>**