

DHAMPUR SUGAR MILLS LIMITED

NON-DISCRIMINATION AND EQUAL OPPORTUNITY POLICY

INTRODUCTION:

Dhampur Sugar Group is committed to provide the same opportunities for hiring, advancement and benefits to everyone without discriminating due to protected characteristics like race, religion, belief, sex, colour, creed, age, national and ethnic origin, marital status, pregnancy, sexual orientation, political affiliation, and physical ability. We are committed to promoting equal employment opportunities and a workplace that is free of all forms of discrimination.

This policy is reinforced by our one of the core value “Humanitarian” and key guiding principles in creating an inclusive workplace and work culture in which all employees are treated with respect and dignity. The same is underpinned by our Corporate Business Principles and our Code of Business Conduct.

This Policy is without prejudice to any anti-discrimination provisions of applicable law including, but not restricted to, the provisions of:

- Article 17 of the Constitution of India;
- The Protection of Civil Rights Act, 1955,
- The Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, 1989;
- The Sexual Harassment of Women at the Workplace (Prevention, Prohibition and Redressal) Act, 2013;
- Sections 354 and 509 of the Indian Penal Code, 1860; and,
- The Persons with Disabilities (Equal Opportunities, Protection of Rights and Full Participation) Act, 1995 and the rules made thereunder.

POLICY & GUIDELINES:

1. Objective:

The objectives of this Equal Opportunity (EEO) and Anti-Discrimination Policy are to ensure that all:

- 1.1 Employees or potential employees do not suffer unfair discrimination in the workplace.
- 1.2 Stakeholders in the organization work in an environment where all decisions are free of discrimination, where they have equal opportunity based on relevant abilities and merit.
- 1.3 Employees encourage to promote equal employment opportunities and a workplace that is free of all forms of discrimination. Equal opportunity means that all staff experience fairness, impartiality and equal access to all career initiatives in the DSML.
- 1.4 Personnel actions, such as compensation, benefits, transfers, layoffs, company-sponsored training programs, and social and recreational programs, will be administered on a non-discriminatory basis.
- 1.5 Application of labour laws to be uniformly applied in the organization.

2. Applicability:

This policy governs all areas of employment at Dhampur Sugar Mills Ltd. and its subsidiaries in India.

3. Policy Framework:

The salient features of the policy are as under:

- 3.1 **Equal Employment Opportunity (EEO) and Provisions of Services:** It refers to the principle which ensures that all employees and potential employees of DSML are treated equitably and fairly regardless of their race, sex or disability. Everyone has an equal chance when applying for jobs, IJPs, transfers, promotions, training opportunities and in their working conditions. The following activities shall be conducted in a uniform manner:
 - 3.1.1 Recruitment procedure and selection criteria for appointment or engagement of a person as an employee.
 - 3.1.2 Promotion and transfer of an employee.
 - 3.1.3 Training and staff development for an employee; and
 - 3.1.4 Terms of employment or any other employee-related activity

- 3.2 **Workspace Discrimination:** Discrimination occurs when someone is treated unfavourably because of a certain attribute. Discrimination may involve some or all the following:
 - 3.2.1 Conduct that can be considered harassing, coercive, or disruptive, including sexual harassment.
 - 3.2.2 Making offensive 'jokes' about another worker's clan, ethnic background, colour, sex, appearance, or disability.
 - 3.2.3 Expressing negative stereotypes about particular groups, e.g., "married women shouldn't be working."
 - 3.2.4 Judging someone on their political or religious beliefs rather than their work performance.
 - 3.2.5 Using selection processes based on irrelevant attributes such as ethnic or clan group, age, sex or disability rather than on knowledge, skills and merit.

- 3.3 **Parameters of Discrimination - Strictly Prohibited:** DSML and its employees shall strive to create a workplace that is free from discrimination in their employment practices against any potential or existing employees, and shall not discriminate on a person's:
 - 3.3.1 Age or other circumstances
 - 3.3.2 Colour
 - 3.3.3 Cultural or social beliefs such as religious
 - 3.3.4 Educational background
 - 3.3.5 Race, ethnicity or nationality
 - 3.3.6 Spiritual, traditional or customary beliefs
 - 3.3.7 Political opinion
 - 3.3.8 Physical features or physical disabilities
 - 3.3.9 Gender identity and expression
 - 3.3.10 Marital status
 - 3.3.11 Pregnancy or judging the impacts of potential pregnancy on decisions.
 - 3.3.12 Breastfeeding
 - 3.3.13 Sexual orientation
 - 3.3.14 Health or physical disability or impairment
 - 3.3.15 Medical record / HIV status
 - 3.3.16 Family responsibilities
 - 3.3.17 Trade union membership
 - 3.3.18 Reserve disciplinary forces, e.g., police

4. Roles and Responsibilities:

4.1 Employee Responsibilities: DSML employees have the following responsibilities:

- 4.1.1 To comply with this policy and all applicable laws and regulations.
- 4.1.2 Compliance is required whenever an employee is acting in their capacity as a representative of the Company.

4.2 Responsibilities of Managers and Supervisors: Managers and supervisors have the following additional responsibilities:

- 4.2.1 To take reasonable steps to resolve complaints that are brought to their attention and to maintain confidentiality as far as practicable.

4.3 Human Resources Responsibilities: Human Resources representatives have the following additional responsibilities:

- 4.3.1 To provide advice and address grievances relating to the employment of persons with disabilities and/or any other complaints regarding discrimination in any other form against any job applicant/employee.

GOVERNANCE:

5. Complaint Process and Procedures:

A person wishing to make a complaint of discrimination can consult and file a complaint in writing and addressed to Group Ethics Officer (GEO) within 5 working days of any such incident of discrimination.

6. Investigation:

Once a complaint has been filed, an investigation will be undertaken immediately. In instances where there is an alleged respondent, the respondent will be notified immediately. The complainant and the respondent will both be interviewed along with any individuals who may be able to provide relevant information.

Where the alleged discrimination is an organizational practice or procedure, that practice or procedure will be investigated immediately. Where the investigation finds systemic discrimination within the organization, that practice or procedure will be changed promptly.

7. Mediation:

DSML supports resolving matters through mediation provided that it is consistent with organizational duties, obligations and needs. Mediation can only be undertaken voluntarily. If both parties agree to participate, matters may be resolved through mediation in the following circumstances. Once the matter has been investigated and DSML has determined the facts of the case, DSML may use mediation to develop appropriate solutions to the complaint; and, in rare instances, where the incident is an isolated event and the parties do not dispute the facts, DSML will act diligently to ensure that matters are dealt with in a manner that ensures the safety and protection of everyone within the organization.

8. Timelines:

DSML 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.

9. Fairness:

All complaints will be investigated in the same manner with the aim of promoting, fairness and equality.

10. Confidentiality and the Right to Privacy:

DSML will 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 DSML 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. DSML 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.

11. Outcomes and Remedies:

DSML 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.

12. Appeal Process:

Within 10 days from the result of the first round of investigation, either the complainant or the respondent may make a written request that an investigation be reviewed stating which aspect of the investigation is inadequate. The request must be submitted to GEO, who will determine if the investigation is to be re-opened in order to address the concerns raised.

In case the appeal is taken up, then the investigation shall be completed within 15 working days by the same committee with the inclusion of an independent member. The result of the appeal shall be binding on the complainant, respondent and all related parties concerned for all purposes.

13. Non-compliance and Consequence:

Any instances of discrimination or favouritism with proper evidence that comes to or is brought to the notice of the management will be dealt with strictly in accordance with the terms of this policy and any other appropriate policies of the company.

14. Exception Handling:

14.1 Any exception should be approved by MD / Chairman through Group Ethics Officer.

14.2 Management reserves the rights to amend or cancel any of the provisions of this policy fully or partially without assigning any reason of whatsoever in nature.

15. This policy shall supersede and replace all prior policies, arrangements, agreements and understandings, oral or written on code of conduct or similar subject.