

EQUAL OPPORTUNITY POLICY FOR PERSONS WITH DISABILITIES

Preamble

Kohler India Corporation Private Limited (Company/KICPL) is a private limited company having its registered office in New Delhi and corporate office in Gurgaon, Haryana and has a nationwide presence.

KICPL recognize the value of 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 equally with respect and dignity.

We are dedicated to diversity in our workforce and proud to be an equal opportunity employer. We consider qualified applicants without regard to disability, race, colour, caste, religion, gender, national origin, age, sexual orientation, marital status, pregnancy or any other legally protected status. we will not discharge or in any other manner discriminate or retaliate against employees or applicants because they have inquired about, discussed, or disclosed their disabilities. The Company considers discrimination due to physical disability in any form as a serious workplace issue and shall stringently action against the offenders as per ***The Rights of Persons with Disabilities Act, 2016 (Act)***.

The stems of ***the Right of Person with the Disability Act, 2016***, start from the Constitution of India. The Constitution safeguards to the citizens, including the disabled, a right of justice, liberty of thought, expression, belief, faith and worship, equality of status and opportunity and for the promotion of fraternity. ***Article 15(1) of the Constitution of India*** enjoins the Government not to discriminate against any citizen of India (including disabled) on the ground of religion, race, caste, sex or place of birth. Persons with Disabilities are a valuable human resource for the country and seeks to create an environment that provides them equal opportunities, protection of their rights and full participation in society.

We ensure that policies and programmes relating to equal opportunities and treatment of persons with disabilities without discrimination on the grounds of sex or location that promote inclusive and multi-sectoral approaches providing opportunities in education, health, training and employment, social services, information and communication and other areas must be enacted and enforced.

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Scope

The Equal Opportunity Policy covers all persons with benchmark disabilities (as defined in “The Rights of Persons with Disabilities Act, 2016”) and will be applicable to KICPL employees of all classes and categories irrespective of whether they are against regular, work charge, temporary or trainee posts unless specifically stated otherwise. The policy would also cover those employees who may acquire disability during their employment with the company. This policy also applies to all aspects of employment, be it recruitment, training, working conditions, salary, transfers, employment benefits and career advancement etc.

This policy is in line with the Rights of Persons with Disabilities Act, 2016 (**RPWD Act**) and the Rights of Persons with Disability Rules, 2017 (**RPWD Rules**).

Definitions

- **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.
- **Information and Communication Technology** includes all Services and innovations relating to information and communication, including telecom services, web-based services, electronic and print services, digital and virtual services.
- **Private Establishment** means a company, firm, cooperative or other society, associations, trust, agency, institution, organisation, union, factory or such other establishment as the appropriate Government may, by notification, specify.
- **Specified Disability** means disabilities mentioned in the Schedule of the RPWD Act 2016.
- **Persons 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.

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- **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.
- **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 others.

POLICY STATEMENT

Kohler India Corporation Private Limited is committed to eliminating all forms of unlawful discrimination, which includes direct discrimination, indirect discrimination, and denial of reasonable accommodation, bullying and harassment of people with disabilities.

At KICPL, we continuously strive to ensure that all our facilities, technologies, information, and privileges are accessible to people with disabilities.

Principles

The Company further affirms its commitment to promoting the following principles in all its policies and interaction with persons with disabilities.

- Dignity treating those with disabilities as customers and clients who are as valued and deserving of effective and full service as any other customer.
- Independence- freedom from control or influence of others; freedom to make your own choice.
- Integration- allowing people with disabilities to fully benefit from same services, in the same policy and the same or similar ways as others.
- Equal Opportunity- having the same chances, options, benefits and results as others.

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Objectives

In accordance with the aforementioned principles, the Company strives to provide short of undue hardship:

- A framework for the adoption of and compliance with all regulatory requirements under the Act.
- Equal access to our goods, services and facilities.
- A work and business environment that is free of discrimination.
- The continual improvement of access to the Company property, facilities and services.
- Quality services- both what we deliver and how we deliver services to all members of the Company's community.

Identification of Posts and Reservation in Appointment

- KICPL shall not discriminate against any person with disability in any matter relating to employment.
- KICPL shall identify posts that can be held by respective categories of persons with disabilities. The identification of suitable posts for Persons with Benchmark Disabilities shall be carried out as per the Government of India directives issued from time to time.
- Vacancies earmarked for Persons with Benchmark Disabilities mentioning the category of disability will be clearly indicated in the Recruitment advertisement.

Manner of Selection

- KICPL shall adopt a transparent selection process based on merit and without any bias to the disabilities of the prospective candidates as per the provisions of the company's Recruitment Policy. Candidates with necessary disability certificate issued by the competent authority in accordance with the Rules under the Act shall be considered for employment in the Company.
- To the extent possible, Persons with Benchmark Disabilities candidates shall be provided reasonable assistance and support and barrier-free admittance to the interview processes.
- Persons with Benchmark Disabilities candidates who have limits in writing including that of speed shall be provided reasonable assistance and support.

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Post-Recruitment and Pre-Promotion Training

- KICPL shall impart post-recruitment induction training programs and pre-promotion job-specific inclusive training programs to employees with disabilities along with other employees.

Reasonable Accommodation

KICPL 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:

- to ensure equal opportunity in the application and selection process,
- to enable an employee with a disability to perform the essential functions of a job, and
- to enable an employee with a disability to enjoy the same benefits and privileges of employment as non-disabled employees.

Accessibility

- KICPL shall provide an appropriate barrier free and conducive environment to employees with disability. To the extent possible, the built-up environment shall be made accessible to PWD, and all future establishments shall reasonable assistance and support for e.g. ramps, accessible parking, accessible toilets, etc.
- KICPL will endeavour to provide suitable facilities and amenities/assistive devices to persons with disabilities for effective and efficient discharge of their functions.
- KICPL will endeavour to ensure that persons with disabilities are enabled to participate in meetings in a convenient mode of communication.

Digital Infrastructure

It is KICPL continuous endeavour 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 Right of Persons with Disabilities Rules 2017 are-

- Website Standards: Guidelines for Indian Government Websites (GIGW), as adopted by Department of Administrative Reforms and Public Grievances, Government of India.

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- Documents Standards: Electronic Publication (ePUB) or Optical Character Reader (OCR) based pdf formats.

We will endeavour to procure and implement accessible technologies. Any employee facing accessibility challenges can reach out to the local IT support team or write to Liaison Officer.

Assistive Devices

Where a person with a disability requires the use of their own personal assistive device in order to access the Company and his work, he/she is welcome to do so.

Training and Career development

KICPL will endeavour to deliver 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 etc., should be placed at least one week prior to the scheduled date of commencement of induction/training.

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.

KICPL provides an option of unpaid special leave as advised by the registered medical practitioner in writing or any additional unpaid leaves sanctioned by HR (in addition to the existing leaves provided as per the terms of the Employment), whichever is less for employees with disabilities who plan to undergo medical treatment. The procedure for availing the leave is detailed out in company's Leave Policy.

Transfers and Posting

KICPL shall supportively consider, to the extent possible, the transfer requests or preferred place of posting of employees with disabilities or those being caregivers of dependent family members with disabilities residing with the employee, to optimally utilize their services.

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Employee Engagement and social inclusion

KICPL will endeavour 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.

GOVERNANCE FRAMEWORK

The Director Human Resource is responsible for ensuring that the establishment operates in compliance with The RPWD Act, 2016 and to fulfil the terms of this Policy. The Director Human Resource takes a lead in implementing the programme and is responsible for planning, monitoring, and reviewing the programme's progress to ensure compliance with the Policy.

Bold ability BRG (Business Resource group)

Bold ability BRG (Business Resource group), an existing committee comprises of two members who has extensive knowledge of disability issues and reports to Director – India Technical Center shall perform following functions:

- Collect periodic feedback from various stakeholders on disability barriers.
- Create an annual action plan to reduce disability barriers, based on the feedback received.
- Allocate budget to implement the plan.
- Monitor the progress of the plan to ensure that the required targets are met.

The BRG will share its report annually within 2 months from the end of the financial year, on the various equal opportunity activities undertaken to the Board of Directors of the Company.

Liaison Officers

As per the mandate of The RPWD Act, KICPL has appointed the following as Liaison Officers 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.

- a. Manager Admin (Regional and Corporate Offices)
- b. Manager Admin (Faucet and Vitreous Plant)

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c. Manager Admin (Global Shared Services)

The Liaison Officers shall be responsible for:

- Implementing the action plan provided by BRG and coordinate 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 said Policy.
- Developing proactive strategies to prevent discrimination and harassment and provide necessary advice to BRG, from time to time.
- Report any breach of the Equal Opportunity Policy or Employee grievances to BRG within due time.

All employees have the responsibility to comply with the Equal Opportunity Policy. Managers and team members need to monitor the work environment to ensure that it is free from discrimination and harassment and encourages inclusion and respect for others.

All employees are encouraged to report any incidents of violation of this policy and Managers should act promptly when concerns arise, or complaints are made.

Maintenance of Records

The Company may 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 may, at their own will, disclose or 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 update the concerned department in this regard.

The information that an employee shares about her/his disability will be kept confidential.

Exceptions to the confidentiality clause:

- Managers/Supervisors may be given information about an employee's disability for allowing/providing any accommodations.

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- Security personnel may be given information about an employee's disability so as to facilitate obtaining any necessary support during an emergency.
- Government officials who are investigating the compliance with The RPWD Act may be given information about an employee's disability, when demanded by the Authorities in writing.

Affirmative Action

KICPL for the purpose of promoting equality of opportunity, seeks to increase the representation of people with disabilities using suitable recruitment and outreach efforts. These include, but is not limited to:

- Participation in job fairs, training and scholarship programmes and organising special recruitment drives and training and employment of people with disabilities who have high support needs.
- All training programmes conducted for people from lower socio-economic backgrounds will be inclusive.
- A certain percentage of the CSR budget will be allocated for supporting disability programmes.

Approved by:

Pankaj Kumar Rai

Senior Director – HR, South Asia, Middle East & SSA

March 23rd, 2022

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