

EQUAL OPPORTUNITY POLICY

NANDAN DENIM LIMITED

Overview

Nandan Denim Limited (“NDL”) is committed to promoting diversity and inclusion among its workforce and aims to create a harmonious workplace for employees regardless of their gender, nativity, community, religious beliefs or physical and mental ability, such that all employees can achieve their full potential. We, at NDL believe in providing equal opportunity to persons from all sections of the society including Persons With Disabilities (“PWD”) as detailed in this Equal Opportunity Policy (“the Policy”). The aim is to ensure that employees of the Company are not discriminated in the course of employment because of their differences in areas such as gender, race, nationality, marital status, physiology, surname, geography or religion, and to protect workers’ rights of equal employment.

NDL is committed to eliminating all forms of unlawful discrimination (which includes direct discrimination, indirect discrimination and denial of reasonable accommodation), bullying and harassment of employees with disabilities.

- NDL continuously strives to ensure that all our facilities, technologies, information and privileges are accessible to employees with disabilities.
- If an employee acquires a disability during her / his employment tenure she / he can return to work at the suitable rank as before. In case the employee is unable to perform the current job, NDL will invest in re-skilling the employee for another position at the same rank or higher.
- Further, in line with the provisions in the Act and the Rules, we at NDL have implemented the following Policy provisions in order to provide affirmative action and promote inclusive growth of employees including in NDL

Definition of Employment Discrimination

Employment discrimination refers to the practice of employers to make any difference, exclusion or preference in employment opportunities or employment package based on factors of workers unrelated to their vocational capacities and the intrinsic objective needs of their employment, which has revoked or damaged their rights of equal employment.

Employment discrimination includes the following:

- 1) Direct discrimination refers to the difference, exclusion or preference made by employers on workers based on factors such as nationality, ethnicity, gender, identity, religion, disability, physical appearance, age, health status and sexual orientation, which has revoked or damaged equal opportunities on employment or career or equal employment package.
- 2) Indirect discrimination refers to the effect of the practice of employers that will revoke or damage equal opportunities on employment or career or equal employment package and so forth, although there is no explicit indication that the difference, exclusion or preference in relation to the above discrimination factors has been made on workers.

MEASURES ON NON DISCRIMINATION AGAINST EMPLOYMENT

General provisions

1. Obligations of Anti-Discrimination against Employment

NDL shall protect the equal employment rights of its workers in accordance with the provisions under this system and related laws and regulations. In terms of provision of equal employment opportunities and fair employment packages to workers, no discriminatory request is allowed. Anti-discrimination should be regarded as our own social responsibility.

2. Prohibition of Discrimination during Recruitment Process

No discriminatory conditions of employment shall be explicitly or implicitly stated, except being directly related to the nature of artefact.

3. Obligation of Employers on Filing Information of Labour

A sound system for filing information of labour shall be established. Labour files shall include original materials of workers gathered during recruitment process, labour contracts and other relevant materials.

4. No Arbitrary Dismissal of Workers

No workers shall be dismissed for discriminatory reasons.

5. No Retaliation against Workers

No retaliation against workers is allowed as a result of complaints, prosecutions, reports or accusations brought by workers against employment discrimination or as a result of their assistance in investigation and providing testimony, including acts such as re-designation, suspension, demotion, reduction of labour remuneration or dismissal of workers without proper reasons or otherwise forcing the employment of workers to be terminated involuntarily, unless the worker is incompetent for his/ her current duties or working position.

IDENTITY DISCRIMINATION

1. Nationality and Geographical Discrimination

No employment of labour of a particular nationality or region shall be refused on the ground of their nationality or region, no employment standard for such labour shall be raised and no unequal differential package shall be given in their occupations.

2. Discrimination on Registered Residence

No employment of workers with non-local registered residence shall be refused on the grounds of their registered residence, no employment standard for such labour shall be raised and no unequal differential package shall be given in their occupations.

SEX DISCRIMINATION

1. Discrimination against Women

The State guarantees that women enjoy equal labour rights as men. When recruiting workers, employers shall not refuse to employ women or raise the employment standards for women on the ground of gender, except for the types of work or positions that are not suitable for women as stipulated by the State.

2. Equal Remuneration for Equal Work between Men and Women

Equal remuneration for equal work between men and women is in place. Women enjoy equal rights as men in terms of labour remuneration, welfare and benefits.

3. Equal Rights in Employment

Women enjoy equal rights in employment and career as men.

4. Special Requirement for Women

In female employee recruitment and during their employment, there should be no provision in their labour contracts that restricts their marriage, pregnancy and childbirth. In female employee recruitment, it is prohibited to request employees or existing female employees to participate in pregnancy tests or to refuse their employment or to re-designate or dismiss them for such a reason.

When female employees are pregnant and it is impossible to engage them in their original work, the employer shall re-designate them to other positions which shall not be harmful to the physical and mental health of such female employees.

It is not allowed to reduce the salary of female employees, dismiss them or unilaterally terminate their labour contracts for reasons such as marriage, pregnancy, maternity leave and breastfeeding, except for requests from female employees to terminate their labour contracts.

5. Prohibiting Sexual Harassment against Women

It is our obligation to prohibit all forms of sexual harassment against women in their workplaces.

DISABILITY DISCRIMINATION

1. National Obligation to Ensure Employment of the Disabled

The State guarantees equal employment rights for the disabled, and the people's governments at all levels shall create employment conditions for the disabled.

The State offers tax incentives to the employers that arrange employment for the disabled and to the disabled who are self-employed according to laws, and provides support in terms of production, operation, technology, fund, material, venue and so forth.

2. Equal Rights in Employment of the Disabled

It is not allowed to provide unequal differential packages to the disabled in employment and occupation.

3. Special Requirement for the Disabled

The Company shall provide the disabled employees with labour conditions and protection based on their characteristics, and ensure that workplaces, work equipment and living facilities are in conditions that they are suitable for disabled employees to access and use according to actual needs.

On-job technical training should be provided to disabled employees to improve their skills on jobs and their technical levels.

Other Aspects of Employment Discrimination

1. Ethnic discrimination

In labour recruitment, no employment shall be refused on the ground of their ethnicity, no employment standard for labour of any ethnicity shall be raised and no discriminated package shall be given in their occupations.

2. Discrimination against Physical Appearance

In labour recruitment, no employment shall be refused on the ground of their physical appearance such as height, weight and facial appearance, unless there is a clear and necessary special need intrinsically for certain work.

3. Age Discrimination

Unreasonable age restriction shall not be set to impair the equal employment rights of workers. Age conditions shall not be set for employment and promotion, and no discrimination shall exist for the retirement ages between men and women. For the purpose of giving benefits to female employees, it can be stipulated that women may retire five or ten years earlier under voluntary application.

GRIEVANCE MECHANISM

Aggrieved employees covered under this Policy can file a complaint concerning any discrimination at Plant address to P.K. Srivastava, VP (HR & IR). Action taken on complaints received will be submitted to the President (Finance & ESG).

On investigation, if the employee against whom the complaint has been made is found guilty of discriminatory behaviour, she/he will be subjected to disciplinary actions.

Possible action taken against the employee may include a reprimand, detraction of benefits for a definite or indefinite time period, demotion, denial of promotion and suspension or termination for more serious offences. Involuntary or indirect discrimination will be resolved through training, counselling and suitable modification of procedures when required to ensure fair treatment.

GENERAL

The responsibility for implementation of the Policy shall lie with Unit's Head and IR/ HR Head. The Policy shall be published on NDL website. The Company Secretary is empowered and authorised to interpret, clarify, revise, amend / modify or discontinue any or all the provisions of this Policy in accordance with Govt. of India guidelines issued from time to time.