

	Policy Name	Equal Employment Opportunities Policy
	Policy Number	SSWL/HR/18
	Effective date of Issue	1 st Jan, 2024
	Effective date of Implementation	1 st Jan, 2024
	Review date	31 st Jan, 2026
	Issue No.	02
	Page No.	1 P a g e
Reason of Issue:		
1. Timeline added in the reporting procedure		
CHRO		
ED (C)		

Contents

1. Purpose.....	1
2. Scope	1
3. Policy.....	2
4. Reporting Procedure.....	3
5. Protection Against Retaliation	3
6. Confidentiality	3
7. Representation	3
8. Pay status	3

Steel Strips Wheels Limited (“the Company”) is committed to fostering a respectful and diverse workplace that is free from discrimination, harassment, and bullying. We recognize every individual's right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices. No applicant for employment or employee will be subjected to discrimination on the basis of nationality, race, colour, religion, caste, gender identity/expression, sexual orientation, disability, HIV positive status, union membership, pregnancy, social origin or status, indigenous status, political orientation, age, marital status, or any other personal characteristic or status. This includes discrimination against them for training, career opportunities, promotions, or pay.

This policy complies with the Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Act of 2017 (HIV/AIDS Act), the Rights of Persons with Disabilities Act of 2016, and the Transgender Person (Protection of Rights) Act of 2019. Location wise Compliance officers have been appointed as in charge of implementation of this policy.

1. Purpose:

The purpose of this policy is to define what is meant by discrimination and bullying, provide guidelines to avoid discriminatory and bullying behaviour, and specify the mechanism for reporting instances of discrimination and bullying.

2. Scope:

This policy covers all employees of Steel Strips Wheels Limited, including full-time, part-time, temporary, contract, apprentice interns/trainees, probationary staff and job applicants with any nationality, race, colour, religion, caste, gender identity/expression, sexual orientation, disability, HIV positive status, union membership, pregnancy, social origin or status, indigenous status, political orientation, age, marital status, or any other

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	Issue No.	02
	Page No.	2 P a g e

personal characteristic or status. This policy includes person with disabilities and member of LGBT+ community. It applies to all work-related settings and activities, whether inside or outside the workplace, and includes business trips and business-related social events.

3. Policy Statement:

No employee within the Company will be discriminated against, harassed, or bullied on the grounds of any nationality, race, colour, religion, caste, gender identity/expression, sexual orientation, disability, HIV positive status, union membership, pregnancy, social origin or status, indigenous status, political orientation, age, marital status, or any other personal characteristic or status, person with disabilities and member of LGBT+ community or any other basis prohibited by applicable Indian law.

We at SSWL strongly encourage candidates from diverse workforce to apply for identified suitable employment, career advancement, training, and other benefits are awarded only based on merit. The positions have been identified for persons with disabilities based on the suitability of the person to perform and carry out roles and responsibilities. Any information shared by candidates or employees with regards to their disabilities /medical conditions /gender /sexual orientation /community /religion /caste/ HIV status will be strictly confidential and not to be disclosed without prior consent of person.

Bullying at Steel Strips Wheels Limited is defined as repeated offensive, intimidating, humiliating behaviour that attempts to undermine an individual or group.

4. Facilities:

SSWL aims to ensure Physical Infrastructure, restrooms & washroom accessibility and Digital Infrastructure & adhere to accessibility standards prescribed by Government of India.

5. Recruitment & Selection:

SSWL thrives to hire diverse workforce on identified role, the mode of selection will be reviewed regularly to ensure they are non-discriminatory and relate to skill and aptitude for the job and selection is based on merit.

6. Equal Remuneration & Benefits:

There will be no discriminated on remuneration based on the grounds of any nationality, race, colour, religion, caste, gender identity/expression, sexual orientation, disability, HIV positive status, union membership, pregnancy, social origin or status, indigenous status, political orientation, age, marital status, or any other personal characteristic or status, person with disabilities and member of LGBT+ community or any other basis prohibited by applicable Indian law.

7. Employee Induction and Onboarding :

New joiners will be made familiar with equal opportunity policy; employees will be provided with the path o the policy availability (online) as well as grievance handling process of this policy.

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	Review date	31 st Jan, 2026
	Issue No.	02
	Page No.	3 P a g e

8. Grievance Redressal :

i. Reporting Procedure:

Any employee who believes they have been subjected to discrimination or bullying is encouraged to report the matter immediately to the Human Resources Department. The report should include the specifics of the incident(s), the date(s) and time(s) of occurrence(s), the person(s) involved, and the names of any witnesses.

All complaints will be dealt with in a confidential, respectful, and timely manner. Investigation and resolution of complaints will be impartial & fair. Appropriate disciplinary action will be taken against any person found to have breached this policy.

ii. Protection Against Retaliation:

Retaliation against an individual for reporting discrimination or bullying, or for participating in an investigation, is strictly prohibited. Any acts of retaliation will be treated as a breach of this policy and property action will be taken.

For any clarifications relating to this policy or its implementation, employees are encouraged to contact the Company's HR Department.

iii. Confidentiality:

Complaints will be kept confidential to the extent possible consistent with a full investigation. All hearing and records shall be private, and the organisation shall not release information concerning a complaint to anyone not involved in the investigation of the complaint. The purpose of this provision is to protect the confidentiality of the member or employee who files a complaint, to encourage the reporting of any incidents of harassment, and to protect the reputation of any person wrongfully accused of harassment.

iv. Representation:

Both the complainant and the person accused of harassment will have the right to be heard and to be accompanied at each step of the procedure by a co-employee.

v. Pay status:

As representative and witnesses who are complainant & accused shall be granted release time to attend meetings convened under this procedure. Such release time will be considered time worked.

vi. Responsibility Matrix:

- The Plant Heads along with the CHRO & Location HR Head will be responsible for implementation of the Rights of persons with Disabilities Act 2016 and rules framed thereunder.

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	Issue No.	02
	Page No.	4 P a g e

- Location HR will be the liaison officer as per provisions of Rule 8(e) of Rights of persons with disabilities Rules 2017 published by the central government. The Liaison Officer shall be responsible for ensuring adherence to his policy and the law along with the location Plant Head.

vii. Timeline: In order to bring conclusion 1-month timeline for closure of all Cases.