

# Equal Opportunities to Transgender Individuals

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## 1. Equal Opportunities to Transgender Individuals

At Accelya we are an equal opportunity employer. Employment opportunities are available regardless of race, colour, religion, national origin, sex and sexual orientation, age, marital status or disability. This principle applies to all aspects of the employment relationship, including recruitment, training, work assignment, promotion, transfer, termination and salary administration. Staff are expected to treat one another with fairness and respect. Managers are expected to exercise leadership by discouraging prejudice and by rolemodelling appropriate behaviour.

We strictly prohibit any form of harassment, including any form of behaviour which violates personal dignity, or which creates an intimidating, humiliating or offensive work environment.

It is everyone's responsibility to read and follow the Accelya Group Equal Opportunity and Anti-Harassment Policy which applies to all unanimously. Accelya Group Equal Opportunity and Anti-Harassment Policy can be accessed <a href="here">here</a>.

In addition, with specific references to transgender persons, the company is committed to comply with the provisions of the Transgender Persons (Protection of Rights) Act, 2019 & Transgender Persons (Protection of Rights) Rules, 2020.

The beneficiaries of this Policy are the Transgender Persons, which are defined (under the Act) as follows:

"Transgender Person" means a person whose gender does not match with the gender assigned to that person at birth and includes trans-man or trans-woman (whether or not such person has undergone Sex Reassignment Surgery or hormone therapy or laser therapy or such other therapy), Person With Intersex Variations (defined below), genderqueer and person having such socio-cultural identities as kinner, hijra, aravani and jogta.

"Person With Intersex Variations" means a person who at birth shows variation in his or her primary sexual characteristics, external genitalia, chromosomes or hormones from normative standard of male or female body.

In Accelya, we do not discriminate against any transgender person in any matter relating to employment including, but not limited to, recruitment, promotion and other related issues. Accelya thrives to ensure equal opportunity in all aspects of employment irrespective of their gender including transgender persons. Thus, creating and maintaining a non-discriminatory and inclusive work environment which ensures a career growth path for transgender people. Transgender people experience unique challenges at work, transgender often feel less supported in the workplace. The Equal Opportunities to Transgender Individuals Policy enables more inclusive, diverse, and supportive working environments of the employees of Accelya.





### 1.1. Key Principles

- Respect for Identity: The company recognizes and respects each employee's selfidentified gender. Employees have the right to be addressed by their chosen name and pronouns.
- Non-Discrimination: Discrimination, harassment, or bullying based on gender identity or expression is strictly prohibited. Violations will result in disciplinary action, up to and including termination.
- Records & Privacy: All information regarding Transgender employees and applicants' will be treated as confidential information (such as name, address, Transgender proof, gender identity and nature of work) in our HR Systems and will be used in accordance with applicable laws.
- **Equal Opportunity:** Providing a safe working environment and ensure discrimination against transgender persons in any employment related matter including infrastructure, recruitment, employment benefits, promotion, career development and training as those afforded to other employees.
- Inclusive Facilities: Employees have the right to use restrooms and other facilities that align with their gender identity. The company will also strive to provide gender-neutral restrooms with measures for safety and security and hygiene.
- Safety: We ensure all measures are taken (as may be advised from time to time) for
  providing a safe working environment for Transgender Persons and to ensure that no
  Transgender Person is discriminated in any matter relating to employment including, but
  not limited to, infrastructure adjustments, recruitment, employment benefits, promotion
  and other related issues.
- We have put in places measures to ensure safety and security of Transgender Persons.
   Other amenities (such as hygiene products, guards, transportation etc.) to be provided to the Transgender Persons are available as per requests and needs of these employees, so as to enable them to effectively discharge their duties in the establishment.
- **Awareness**: Regular sensitization sessions will be conducted to educate employees about gender diversity and inclusion, ensuring a respectful and supportive workplace.
- The Human Resources department is responsible for applicability of all rules and regulations regarding service conditions of transgender employees.

# 1.2. Complaints Officer

Accelya hereby appoints Ms. Bhavana Singh, Senior Specialist - HR Regional Operations, as Complaints Officer of the company under the Transgender Persons (Protection of Rights) Act, 2019.

The Complaints Officer will have the following responsibilities, related to the violation and grievance in relation to the provisions of the Transgender Persons Act and to create a supportive environment for transgender persons, free from discrimination.

i. **Handling Complaints:** The Complaints Officer is responsible for receiving and addressing complaints related to the violation of transgender persons' rights.





- ii. <u>Investigation and Resolution</u>: Upon receiving a complaint, the Complaints Officer shall enquire into the complaint within 15 days of receipt of complaint (with supporting evidence, if any).
- iii. **The Regional Head People & Culture** shall take action on the enquiry report submitted by the complaints officer within fifteen days from the date of submission of the report by the Complaints Officer.
- iv. If the Complaints Officer fails to commence or complete the enquiry within the stipulated time frame, Regional Head People & Culture shall take action forthwith in all cases where action has not been taken in accordance with the above time limits.
- v. We shall endeavour email (resolve the grievances raised under this policy within thirty days from the date of bringing of such grievance to the notice of the Complaints Officer or over grievance email (<u>Diversity@accelya.com</u>) as the case may be.
- vi. **Reporting:** Record keeping and regularly reporting the issue with the management for amicable solution.

#### 1.3. Grievance Redressal

Accelya has zero-tolerance towards any act harassment of Transgender Persons at the workplace.

A complaint shall be filed by sending an email to <u>Diversity@accelya.com</u> or it can be routed through the Complaints Officer within 3 months of the date of last incident in writing.

- Complainant should try but not mandatory to provide records of incidents i.e. dates, times, locations, possible witness, what happened, response etc. while registering the complaint.
- Complainant needs to acknowledge the complaint by signing the complaint document.
- Notice shall be issued to the respondent within 3 working days of receipt of the complaint and 5 working days shall be given for submission of reply (along with the list of witnesses and documents).
- If it is determined that harassment has occurred prompt, remedial action will be taken; but
  if the complaint does not rise to the level of harassment, the committee may determine to
  dismiss the complaint without further investigation. The Complaints officer will record this
  finding with reasons and communicate the same to the complainant.
- Where the aggrieved employee is unable to make a complaint on account of her/his physical or mental incapacity or death or otherwise, her/his legal heir or such other person as may be prescribed may make a complaint within 3 months of the incident.
- Anonymous and frivolous complaints will not be entertained by the Complaints Officer.

