



Equal opportunity and Anti – discrimination policy

I. POLICY STATEMENT:

- a. Titan Company Limited values Diversity and Inclusion and we are committed to offering equal opportunities for employment. We shall not discriminate any applicant for employment or any employee for promotion, training or any career opportunity or compensation, based on nationality, race, colour, religion, caste, gender identity/expression, sexual orientation, disability, HIV positive status, pregnancy, social origin or status, indigenous status, age, marital status or any other personal characteristic or status. We strive to ensure that our workforce is representative of all sections of the society.
- b. The Equal Opportunity and Anti-Discriminatory Policy is in accordance with the provisions of The Rights of the Persons with Disabilities Act 2016, Transgender Persons (Protection of rights) Act, 2019 and Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Act 2017 (HIV/AIDS Act).
- c. Titan Company Limited is committed to eliminating all forms of discrimination including direct and indirect discrimination, denial of any facilities and/or benefits, bullying, harassment of people with disabilities, women, people of the LGBT+ community, people infected with or affected by HIV/AIDS or any other person.
- d. Titan Company Limited will provide equal benefits at all times to all employees including people with disabilities, women, people of the LGBT+ community, people infected with or affected by HIV/AIDS or any other person.

II. SCOPE:

- a. The Equal Opportunity and Anti-Discriminatory Policy covers job applicants, apprentices, contract workers, full time/part time employees, interns/trainees who would be engaged in any Titan Company Premises.
- b. The Equal Opportunity and Anti-Discriminatory Policy applies to all practices, terms and conditions of employment, including but not limited to – recruitment and hiring; position upgrade; promotion; transfer; on-the-job training programs; other training opportunities; wage and salary administration; employee benefits; maternity benefits; layoff or termination; and application of service, seniority, and retirement policies for all employees.

III. FACILITIES & AMENITIES:

- a. Titan Company Limited aims to ensure that our physical infrastructure (buildings, restrooms, locker rooms, canteens, washrooms, furniture, facilities, ramps, elevators,

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transportation, and services like security, medical etc.) adhere to and exceed the accessibility standards prescribed under applicable guidelines / rules / acts.

IV. PROVISIONS:

- a. Titan Company Limited prioritizes equal opportunities and non-discrimination for all individuals. This commitment is evident throughout the employment lifecycle. Job applicants are evaluated against key selection criteria with provisions for reasonable adjustments for special groups such as PWD, Women, members of LGBT+ community, people from affirmative action groups etc. There will be no discrimination against any employee on remuneration. For PWD employees attending training programs, specific needs such as material customization, assistive aids, accessible venues, and interpreters are accommodated. Career development is based on merit, ensuring no discrimination in selection, remuneration, or benefits. New employees undergo orientation, familiarizing them with The Equal Opportunity and Anti-Discriminatory Policy and grievance handling mechanisms.

V. MAINTENANCE OF RECORDS:

- a. Titan Company Limited understands and respects that sharing information about one's disability / gender identity / HIV status is a personal preference. During the period of employment at the company, employee can edit such information any time.
- b. Employees can opt for declaring their gender identity / disability / HIV status at the time of recruitment. Employees may exercise the right to not disclose their gender identity at workplace through "Prefer not to disclose" option, in which case the gender identity will be populated as "Prefer not to disclose".
- c. Confidentiality of data will be maintained with certain exceptions like data being made available for HR, security, and other relevant functions for ensuring reasonable accommodations.

VI. GRIEVANCE REDRESSAL:

- a. Any employee who has experienced any discrimination or harassment based on their / other's gender identity or disability or HIV status is encouraged to report the incident to the location Complaints / Grievances redressal Officer.
- b. For the purpose of the Transgender Persons (Protection of Rights) Act 2019, The Rights of Persons with Disabilities Act, 2016 and the HIV & AIDS (Prevention and Control) Act 2017, the members People Business Partners of respective business location will act as Complaints / Grievance Redressal Officers.
- c. The Complaints / Grievances redressal Officer will do necessary investigation and submit the findings and recommendation to the head of people function of the location. Location people function head will take appropriate action.



- d. The location people function head may also form a committee not exceeding 3 people comprising people from People function, Ethics committee, Business functions and Internal Compliance committee as deemed necessary for the purpose of investigation or for providing recommendation.
- e. Head of Diversity, Equity and Inclusion function will be the Chief Complaint / Grievance Redressal Officer and drive various compliance requirements under this policy.
- f. Reasonable accommodation will be provided to employees with disabilities to effectively participate in the investigation process. For example, sign language interpreter for persons with deafness, accessible venue for persons with locomotor disability etc.

VII. COMMUNICATION OF POLICY:

This policy will be made available to all employees via Titan's Intranet Portal & Company website.

Swadesh Kumar Behera
Executive vice president & CPO