

# MOREPEN LABORATORIES LIMITED

CIN: L24231HP1984PLC006028

Registered Office: Village Morepen, Nalagarh Road, Near Baddi Distt. Solan, Himachal Pradesh – 173 205

Email: plants@morepen.com, Website: www.morepen.com

Tel.: +91-1795-266401-03, 244590, Fax: +91-1795-244591



Corporate Office: 2nd Floor, Tower C, DLF Cyber Park, Udyog Vihar-III, Sector-20, Gurugram, Haryana-122016

Email: corporate@morepen.com, Website: www.morepen.com

Tel.: +91-124-4892000

Document No.: AD-POL-001 | Rev Date: 01 Dec 2024 | Revision No.: 01

## Anti-Discrimination Policy

### 1. Purpose

The Company is committed to fostering a workplace and business ecosystem that is free from discrimination, ensuring that all individuals are treated with fairness, dignity, and respect. This policy aligns with and complies with:

- The Constitution of India, particularly Articles 14, 15, and 16 (Fundamental Rights to Equality)
- The Equal Remuneration Act, 1976 (equal pay for equal work)
- The Rights of Persons with Disabilities Act, 2016 (protection and empowerment of persons with disabilities)
- The Transgender Persons (Protection of Rights) Act, 2019 (protection of transgender persons)
- The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act)
- The Human Immunodeficiency Virus and Acquired Immune Deficiency Syndrome (Prevention and Control) Act, 2017
- The Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, 1989
- SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (for listed entities)
- Business Responsibility and Sustainability Reporting (BRSR) requirements
- International human rights standards and best practices

The objective is to prevent, prohibit, and address all forms of discrimination within the workplace, supply chain, and business operations.

### 2. Scope

This policy applies to:

- All employees: Permanent, temporary, fixed-term, contractual staff, apprentices, interns, trainees (government scheme and otherwise), probationary employees, consultants, and directors
- Third parties: Suppliers, contractors, vendors, business partners, clients, customers, and visitors engaged with or visiting the Company
- All employment-related practices: Recruitment, hiring, selection, training, development, promotion, transfer, compensation, benefits, performance appraisal, discipline, termination, retirement, and all other terms and conditions of employment

### 3. Policy Statement

Prepared By	Reviewed By	Approved By
Asst. Manager-HR	Advisor - HR	Director

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## 3.1 Prohibition of Discrimination

The Company strictly prohibits discrimination, harassment, bullying, bias, prejudice, or unfair treatment based on, but not limited to:

- Caste, creed, tribe, or ethnicity
- Religion, religious affiliation, or spiritual beliefs
- Race, colour, or national origin
- Gender, sex, gender identity, or gender expression (including intersex, transgender, or intergender status)
- Sexual orientation (including LGBTQ+ identities)
- Age or generational status
- Physical or mental disability or impairment (as defined under the RPwD Act, 2016)
- Medical condition, health status, or HIV/AIDS status
- Marital status, civil partnership, or family responsibilities
- Pregnancy, maternity, paternity, or breastfeeding
- Political opinion or affiliation
- Trade union membership or activities
- Educational background or qualification
- Geographical region or place of origin
- Socio-economic status
- Any other characteristic protected by applicable Indian laws

Discrimination includes direct discrimination, indirect discrimination, harassment, victimization, and denial of reasonable accommodation.

## 3.2 Recruitment and Employment Practices

All employment decisions will be based solely on merit, qualifications, skills, competence, experience, potential, and job-related criteria, ensuring:

- Fair, transparent, and non-discriminatory hiring processes
- Equal opportunity in recruitment, selection, onboarding, job assignment, transfer, promotion, training, and career progression
- Competitive and equitable compensation and benefits
- Job advertisements and vacancy notifications include equal opportunity statements

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- Application forms made available in accessible formats upon request
- Notification of vacancies to educational institutions, polytechnics, disability organizations, and special employment exchanges wherever applicable

### 3.3 Workplace Conduct

All employees, contractors, and business associates must:

- Treat colleagues, suppliers, customers, and visitors with professionalism, respect, and dignity
- Refrain from any form of discriminatory behavior, harassment, bullying, intimidation, or offensive conduct
- Foster an inclusive and supportive work environment that celebrates diversity

### 3.4 Third-Party and Supply Chain Compliance

- Suppliers, contractors, vendors, and business partners are required to comply with this policy and uphold anti-discrimination commitments in all business dealings
- The Company conducts due diligence, supplier audits, and regular monitoring to ensure compliance
- Non-compliance may result in corrective action, contract termination, or discontinuation of business relationships

## 4. Special Provisions

### 4.1 Rights of Persons with Disabilities (RPwD Act, 2016)

The Company commits to:

- Equal opportunity: No discrimination against persons with disabilities (including those with benchmark disabilities of 40% or more)
- Reasonable accommodation: Necessary modifications, assistive devices, and adjustments to enable persons with disabilities to perform essential job functions and enjoy equal employment benefits
- Accessible infrastructure: Barrier-free physical environment, accessible digital platforms, communication technologies, transportation, and amenities
- Identification of suitable positions: Posts appropriate for persons with disabilities will be identified and notified to special employment exchanges
- Training and development: Accessible course materials, inclusive appraisal processes, and accommodations for training programs
- Official travel: Accessible transport, accommodation, and allowance for personal attendants where required

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- Voluntary disclosure: Employees may voluntarily disclose disabilities through self-identification forms; information will be treated confidentially

## 4.2 Rights of Transgender Persons (Transgender Act, 2019)

The Company commits to:

- Non-discrimination: Equal treatment in hiring, promotion, and all employment matters
- Confidentiality: Gender identity information will remain confidential except where disclosure is legally mandated or necessary for providing accommodations
- Reasonable accommodation: Facilities and amenities appropriate to transgender persons' needs
- Safe and inclusive environment: Basic infrastructural facilities, inclusive policies, and respect for gender identity

## 4.3 Rights of Protected Persons (HIV/AIDS Act, 2017)

The Company commits to:

- No pre-employment screening: HIV/AIDS testing will not be conducted as part of recruitment or work assessment
- Confidentiality: HIV/AIDS status will remain strictly confidential except as required by government or judicial authorities
- Equal rights and opportunities: Protected persons are entitled to the same rights, benefits, and working conditions as other employees
- No discrimination: HIV infection alone is not grounds for termination or discrimination
- Reasonable adjustments: Alternative working arrangements will be made if fitness to work is impaired by HIV-related illness
- Protection from hatred and violence: No employee shall propagate hatred, discrimination, or physical violence against protected persons

## 5. Appointment of Liaison Officer

For establishments with 20 or more employees, a Liaison Officer (typically the Business Unit HR Head or designated HR personnel) shall be appointed to:

- Oversee recruitment of persons with disabilities, transgender persons, and protected persons without bias
- Ensure provision of necessary facilities, amenities, and reasonable accommodations
- Implement action plans for accessible workplaces and IT systems
- Develop proactive strategies to prevent discrimination and harassment
- Ensure awareness of this policy among all employees

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- Liaise with service providers and facility managers for accessibility compliance
- Address accessibility issues and grievances raised by employees

## 6. Equal Opportunity and Anti-Discrimination Committee

The Company shall constitute an Equal Opportunity and Anti-Discrimination Committee comprising:

- Chairperson: Divisional HR Head or equivalent
- Members: BU-HR Head, Central Recruitment Team Head, Corporate IR/ER Shared Services, Unit Medical Officer, and other relevant stakeholders

### Responsibilities:

- Monitor implementation of this policy
- Review complaints and grievances
- Conduct investigations and recommend corrective actions
- Ensure compliance with applicable laws and regulations

## 7. Reporting Mechanism

### 7.1 Grievance Redressal

Employees, contractors, suppliers, and other stakeholders may report incidents of discrimination, harassment, or policy violations:

- To the Liaison Officer: Through designated email or written communication
- To the HR Department or Compliance Team
- Through the Whistleblower/Grievance Mechanism: Confidential and anonymous reporting channels
- To the Internal Complaints Committee (ICC): For sexual harassment complaints under the POSH Act

### 7.2 Investigation Process

- All complaints will be investigated promptly, fairly, and impartially
- First round of investigation and conclusion within 10 working days from complaint filing
- Both complainant and respondent will be interviewed along with relevant witnesses
- Strict confidentiality and privacy will be maintained throughout the investigation
- No retaliation will be tolerated against individuals who report concerns in good faith
- Frivolous or false complaints made in bad faith will be subject to disciplinary action

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## 7.3 Appeal Process

- Either party may request review of investigation findings within 10 working days of the result
- Appeals will be reviewed by the same committee with inclusion of an independent member
- Appeal investigation will be completed within 15 working days
- Appeal decision is binding for all purposes

## 8. Remediation and Corrective Action

Verified incidents of discrimination will result in:

- Corrective measures: Counselling, targeted training, policy review, or organizational changes
- Disciplinary action: Warning, suspension, demotion, or termination of employment commensurate with severity of violation
- Restoration of workplace harmony: Actions to ensure discrimination ends and complainant is protected from adverse effects
- Reporting to authorities: As legally required, particularly for criminal conduct or violations under specialized laws

## 9. Facilities and Amenities

The Company shall endeavour to provide:

- Physical infrastructure: Barrier-free accessibility compliant with Harmonised Guidelines and Space Standards for Barrier-Free Built Environment (Ministry of Urban Development, March 2016)
- Digital infrastructure: Accessible documents, communication systems, and information technology adhering to accessibility standards prescribed under Indian Government website guidelines
- Assistive devices: On a case-by-case basis to support persons with disabilities
- Transportation: Accessible modes of transport, accommodations for official travel, and allowance for personal attendants
- Social inclusion: Accessible venues for company events, meetings, and employee engagement activities

## 10. Training and Awareness

The Company will provide:

- Regular training programs on anti-discrimination, workplace ethics, diversity and inclusion, equal opportunity, and legal obligations

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- Mandatory training during onboarding and annually for all employees, managers, contractors, and suppliers
- Specialized training on POSH Act, RPwD Act, Transgender Act, and HIV/AIDS Act
- Accessible training materials and reasonable accommodations (assistive aids, accessible venues, interpreters, scribes) upon request
- Training on grievance handling and whistleblower protections for managers and committee members

## 11. Maintenance of Records

The Company will:

- Collect and maintain data on employees with disabilities, transgender persons, and protected persons as required by applicable laws
- Request employees to complete Voluntary Disability Self-Identification Forms
- Maintain records in confidential employee files separate from official personnel files
- Respect privacy and ensure confidentiality of disability, sexuality, gender identity, and health status information
- Furnish returns and information to special employment exchanges and government authorities as mandated

### Exceptions to Confidentiality:

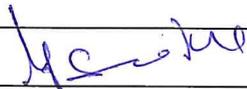
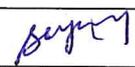
- Managers/supervisors may be informed to provide reasonable accommodations
- Security personnel may be informed to facilitate emergency support
- Government officials investigating compliance may be provided relevant information

## 12. Monitoring, Review, and Governance

### 12.1 Accountability

- Board of Directors and Senior Leadership: Overall oversight and accountability for policy implementation
- Managing Director and Head HR: Responsibility for effective operation of this policy
- HR and Compliance Teams: Regular monitoring, audits, and enforcement
- Liaison Officer: Day-to-day implementation and support

### 12.2 Annual Review and Reporting

		
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- This policy will be reviewed annually for suitability, legal compliance, and alignment with best practices
- Listed entities will comply with SEBI disclosure requirements regarding workplace discrimination, sexual harassment complaints, and diversity metrics in Board Reports and BRSR filings
- Annual report to District Officer (for POSH compliance) by 31st January each year

## 12.3 Display and Dissemination

- This policy will be published on the Company's website and displayed at conspicuous places in all offices, plants, factories, and warehouses
- A copy of this policy will be registered with the Chief Commissioner or State Commissioner for Persons with Disabilities as required
- All employees will have access to the policy through online platforms and induction materials

## 13. Non-Retaliation

The Company prohibits intimidation, victimization, or retaliation against any individual who:

- Reports a concern or complaint under this policy in good faith
- Participates in investigations or inquiries
- Assists or provides information related to discrimination complaints

Any form of retaliation will be treated as a serious violation subject to disciplinary action

## 14. Compliance with Legal and Regulatory Requirements

This policy ensures full compliance with:

- Constitutional provisions and fundamental rights
- Indian labor and employment laws
- SEBI LODR Regulations and BRSR reporting requirements for listed entities
- Companies Act, 2013 disclosure requirements
- All applicable central and state legislation relating to anti-discrimination, equal opportunity, and workplace rights

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