

# Policy on Equal Opportunity and Non-Discrimination

## 1. Introduction

Asian Paints Limited (the Company) is committed to provide equal opportunities without any discrimination, *inter alia*, on the grounds of age, color, origin, nationality, disability, religion, race, caste, gender, sex, sexual orientation, personal characteristic or status. We believe that Inclusion, Equity, and Diversity (IED) at the workplace is an instrument for economic growth, sustainable competitive advantage, and societal progress.

Our IED vision is that:

*“Being a progressive, world class organisation we have created a psychologically safe and inclusive environment which champions diversity in capability and thought leadership”.*

This policy is in alignment with the provisions of the Rights of Persons with Disabilities Act, 2016, the Rights of Persons with Disabilities Rules, 2017, the Transgender Persons (Protection of Rights) Act, 2019 and the Transgender Persons (Protection of Rights) Rules, 2020 and related governing laws in the country.

## 2. Applicability of this Policy

At Asian Paints, we recognize the value of a diverse workforce. We are committed to providing equal opportunities in employment and fostering an inclusive workplace where all employees are treated with respect, equality, and dignity. This policy is applicable for all job applicants, employees of the Company and its subsidiaries.

## 3. Equality and Non-Discrimination

The Company aims to create equal opportunities where all employees from different backgrounds may function without any barriers. The company provides fair opportunity to all employees to participate, develop and contribute freely and equitably. The Company prohibits any kind of discrimination, harassment, victimization, or any other unfair practice against an employee and/or a business associate on the grounds of age, color, origin, nationality, disability, race, religion, caste, gender, sex, sexual orientation, personal characteristic or status.

#### **4. Eligibility for positions offered at the Company**

At Asian Paints, there is no discrimination in the selection process, *inter alia*, based on the grounds of age, color, origin, nationality, disability, religion, race, caste, gender, sex, sexual orientation, personal characteristic or status. The Company shall ensure its hiring channels and procedures are inclusive. Hiring is purely based on merit and candidates are evaluated based on their qualifications, skills, experience, potential and competence to perform the role requirement. Reasonable facilities and amenities shall be provided to job applicants with disabilities as per request and company's discretion.

#### **5. Confidentiality**

- a. All employees and candidates have the right to disclose their gender, gender identity, disability status, HIV/AIDS status, etc. or keep such information private.
- b. Any employee desiring to change their name, gender or disability status or any information relating to their medical health in the official records of the Company should contact the Human Resources team.
- c. All such information collected by the Company (as identified in pt. (a) above) from in relation to their protected characteristics will be kept confidential, and will be used in accordance with applicable laws and subject to applicable law and/or the following exceptions:
  - i. Managers/HR may be given information about an employee's disability for allowing/providing necessary facilities
  - ii. Security personnel may be given information about an employee's disability to facilitate obtaining any necessary support during an emergency.
  - iii. Information in relation to the protected characteristics shall be shared with Statutory Authorities and/or disclosed appropriately in public disclosures (without identifying the person) as per the requirements of applicable law.

#### **6. Facilities and Amenities**

The Company shall take all actions to ensure that a conducive environment is provided for all employees including persons with disabilities, LGBTQIA+ persons to perform their roles and excel in the same. The Company shall conduct, support, and promote at its locations, awareness campaigns and sensitization programs through appropriate means to promote inclusion.

The Company shall build systems and processes to ensure that:

- The facilities are compliant with the 'Harmonized Guidelines and Space Standards for Barrier Free Built Environment for Persons with Disabilities and Elderly Persons' (as amended from time to time), issued by the Ministry of Urban Development, Government of India.
- The provision is made for an accessible environment and assistive devices as required are made available.

## **7. Liaison and Complaint Officer**

The Company has appointed Mr. Nishad Divekar, General Manager – Human Resources, as a Liaison Officer for persons with disabilities, as per the requirements of the Central Rules under the Rights of Persons with Disabilities Rules, 2017 (including such and as a Complaint Officer as per requirements of the Transgender Persons (Protection of Rights) Rules, 2020.

The Liaison and Complaint Officer shall ensure:

- a) that all feasible locations and functions comply with the provisions of the policy.
- b) that employees and job applicants with disabilities and persons of all genders receive the needed facilities and amenities for performing their job and participating in the selection process on an equal basis with others.
- c) that awareness is created among all employees to create an inclusive work environment
- d) that enquiry into the complaints received is conducted and report is submitted to the Chief Human Resources Officer.

## **8. Grievance Redressal**

Business HRs have the functional responsibility for ensuring compliance with this policy. They should proactively take steps to ensure that all employees are sensitized and there is no discrimination in recruitment, training, career development and other aspects of employment.

For any complaints related to the implementation of this policy, employees may reach out to their Business HR and/or Liaison and Complaint Officer identified as per this policy at [InclusionEquityandDiversity@asianpaints.com](mailto:InclusionEquityandDiversity@asianpaints.com).

In case an employee raises a concern, it is assured that they won't be under any risk in the form of retribution or retaliation. The Company shall not tolerate any harassment or victimization (informal pressures) against any employee raising the concern.

The Company shall endeavor to resolve all the grievances and/or concerns raised regarding the implementation of this policy within 30 days of receipt of the said information. Such cases shall be dealt as per the Code of conduct policy of the company and appropriate corrective action shall also be taken.

## **9. Amendments to the policy**

The Company is committed to continuously reviewing and updating its policies and procedures. Accordingly, this policy is subject to modification and updates. This policy shall be reviewed once in three (3) years.

This Policy will be available on the intranet portal of the Company and the website of the Company at [www.asianpaints.com](http://www.asianpaints.com).

**Amit Syngle**  
**Managing Director & CEO**