

Non-Discrimination and Anti-Harassment Policy

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1. PURPOSE

As a part of Tata Code of Conduct, Tata AutoComp is committed towards providing equal opportunities to all employees and to all eligible applicants for employment in the Company. This **Non-Discrimination and Anti-Harassment Policy** is also in accordance with provisions of The Transgender Persons (Protection of Rights) Act, 2019 and Rights of Persons with Disabilities Act, 2016.

2. GENERAL

SCOPE. This policy is applicable to all employees at Tata AutoComp, its subsidiaries and JVs.

ABBREVIATIONS

HR	Human Resources
JV	Joint Venture
TACO	Tata AutoComp

3. PROVISIONS OF THE POLICY

3.1. Tata AutoComp Systems Limited is an equal opportunity provider.

Equal Opportunity Definition: Ensuring that there is no unfair discrimination or harassment on any ground, including race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability or any other category protected by applicable law.

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- 3.2.** When recruiting, developing and promoting employees, the decisions will be based solely on performance, merit, competence and potential.
- 3.3.** Tata AutoComp Policies will be fair, transparent, and clear, which will aim at promoting diversity and equality, in accordance with applicable law and other provisions of Tata Code of Conduct. The Policies provide for clear terms of employment, training, development, and performance management.
- 3.4.** Tata AutoComp has a Zero tolerance policy towards discrimination or harassment on any ground.

4. Guidelines

- 4.1.** Tata AutoComp will make reasonable accommodation, whenever necessary, for qualified employees or job applicants who have disabilities. Reasonable accommodation means necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden in a particular case, to ensure to persons with disabilities the enjoyment or exercise of rights equally with others.
- 4.2.** In accordance with the provisions of The Transgender Persons (Protection of Rights) Act, 2019 and Rights of Persons with Disabilities Act, 2016 & Rules, following will be ensured:
- 4.3.** That the work environment is free from any discrimination, harassment or unfair treatment against transgender persons or persons with disabilities.
- 4.4.** A transgender person shall have a right to be recognized as such, in accordance with the provisions of this Act. A person recognized as transgender shall have a right to self-perceived gender identity. The gender of transgender person shall be recorded in all official documents in accordance with certificate issued by District Magistrate.
- 4.5.** There is no denial or discontinuation of, or unfair treatment regarding, access to, or provision or enjoyment or use of any goods, service, facility, privilege or opportunity. That facilities and amenities are provided to the persons with disabilities to enable them to effectively discharge their duties in the establishment without any hindrance.
- 4.6.** Preparation of a list of posts suitable for persons with disabilities in the establishment and shall notify such posts during the recruitment process.
- 4.7.** It is to be ensured that all relevant workspaces at Tata AutoComp are accessible to persons with disabilities, subject to compliance with any Health Safety Environment requirements applicable to such site including suitable arrangements for use of physical infrastructure, transportation and information and communications.

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4.8. A designated HR Spoc i.e plant HR Head will act as the Complaints-cum-Liaison Officer under The Transgender Persons (Protection of Rights) Act, 2019 and Rights of Persons with Disabilities Act, 2016 to address all grievances or complaints regarding discrimination from any transgender persons or an aggrieved person on ground of disability, within stipulated timelines. The Officer will also look after the recruitment of persons with disabilities and provisions of facilities and amenities for such employees. The name and contact number of the Complaints-cum-Liaison Officer shall be conspicuously displayed at each location.

5. Any exception to the policy can be done only with the prior approval of Head - HR, Tata AutoComp

6. Communication of Policy

Policy will be available on HRMS and corporate website. It will also be available at all conspicuous places in Factories and Offices. All employees will undergo comprehensive training, encompassing e-modules and/or classroom sessions, emphasizing the principles outlined in the Tata Code of Conduct. Notably, these training programs will specifically address discrimination and harassment in the workplace, fostering a culture of awareness, respect, and inclusivity among all staff members.

7. RESPONSIBILITY

Responsibility	Action
HR Team	Conducting training and ensuring adherence to recruitment as per policy
All employees	To not engage in any form of harassment, discrimination, bullying or victimization of other employees
Management	Appropriate action basis investigation in case of breach of this policy

The responsibility for supporting the realization of equal opportunity goals at Tata Auto Comp falls upon the Management, comprising the Chairman, Group Head-HR, BU HR Heads, and Diversity Leads. The Management is tasked with the following:

- Assisting in formulating a list of positions suitable for PWD employees.

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- Recommending selection procedures for staff/persons with disabilities in recruitment, post-recruitment, and pre-promotion.
- Proposing training, preference in transfer/posting, special leave, accommodation allocation, and other facilities for PWDs.
- Ensuring provisions for assistive devices, barrier-free accessibility, and other accommodations for persons with disabilities.
- Supporting the implementation of policies and action plans to make the workplace and IT systems accessible for Staff/PWDs.
- Investigating and resolving complaints or grievances from Employees/PWD employees, trainees, interns, and contract workers.
- Proactively preventing discrimination or harassment of Staff/PWD employees, trainees, interns, apprentices, contract workers, and candidates.

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