

EQUAL OPPORTUNITY POLICY AT HDFC LIMITED

1. **PREMABLE**

At HDFC Limited (“**HDFC**”), we believe in equal opportunity for all our employees, where we are committed to providing an inclusive work culture and environment free from any discrimination. HDFC values and welcomes diversity and will not treat anybody differently based on their race, sex, religion/beliefs, disability, marital or civil partnership status, age, maternity or paternity status, sexual orientation, gender identity, gender expression, caring responsibilities, or any other class of person protected by laws in the country.

At HDFC, our vision is to be “Disability Confident”. HDFC, as an inclusive employer actively encourages the recruitment, development and retention of people with disability and ensures they have equal opportunities in the workplace and strives to provide a safe, accessible and healthy work environment.

This policy (“**Policy**”) has also been framed in accordance with the provisions of the Rights of Persons with Disabilities Act, 2016 (“**Act**”) and the rules framed thereunder and provides a framework which is committed towards the empowerment of persons with disabilities. This policy aims to provide practical guidance on the management of disability issues in the workplace in accordance with the provisions of the Act and its rules.

2. **SCOPE**

This Policy is applicable to all prospective and existing employees of HDFC in India throughout the period of their employment and all of its offices, units and branches located anywhere in India and will be subject to and have to mandatorily comply with this Policy.

The selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question. Person specifications and job descriptions will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment, promotion or transfer will be assessed objectively in line with requirements for the job. HDFC will strictly refrain from demonstrating bias or prejudice towards individual differences which will be valued and protected. The said process will be strictly based on meritocracy.

3. **DEFINITIONS**

- (i) “disability” means any condition which has a significant, adverse and long-term effect on a person's ability to carry out normal day-to-day activities;
- (ii) “person with disability” means a person with long term physical, mental, intellectual or sensory impairment which, in interaction with barriers, hinders his full and effective participation in society equally with others;

- (iii) “person with benchmark disability” means a person with not less than forty percent of a specified disability where specified disability has not been defined in measurable terms and includes a person with disability where specified disability has been defined in measurable terms, as certified by the certifying authority;
- (iv) “person with disability having high support needs” means a person with benchmark disability as certified by certifying authority who needs high support;
 - ◆ Refer Annexure 1, at the end of the Policy document, for details on the Listed Disabilities as per the Act;
 - ◆ Any employee declaring as under “Person with Disability”, please refer Annexure 2 for details on obtaining a Certificate of Disability.
- (v) “discrimination” in relation to disability, means any distinction, exclusion, restriction on the basis of disability which is the purpose or effect of impairing or nullifying the recognition, enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field and includes all forms of discrimination and denial of reasonable accommodation.

4. GUIDING PRINCIPLES

At HDFC, we are committed towards providing a safe, diverse, conducive and comfortable workplace to our employees with complete fairness around employment related decisions including recruitment, development and retention of people with disability.

At HDFC, we strive to ensure:

1. A culture of mutual respect and we respect individual rights and differences of others thereby creating an environment free from any discrimination and biasness;
2. Our policy of equal opportunity provides a conducive work environment which encourages every individual irrespective of any differences to discharge their duties basis their abilities and qualifications;
3. No person with disability will be denied any employment opportunity on grounds of disability and as such, all the vacancies will be filled based on individual’s competence, ability, trainability and suitability in relation to the overall job requirements;

4. Making workplace adjustments in order to ensure persons with Disabilities are not put at a disadvantage by employment arrangements or any physical feature of the workplace and hence, provide a free and accessible environment to all;
5. Equal pay and terms of employment (including benefits, training, promotions, performance reviews, transfers, exits etc.) without any bias. We believe all employees should receive equal pay where they are carrying out similar work, work rated as equivalent or work of equal value. HDFC has a transparent and standard rewards framework applicable to all employees which is objective driven basis individuals' roles, qualification, experience and duties;
6. Any benefits (monetary, developmental or progression) will be based on performance and potential as per the business need;
7. We inculcate awareness amongst our employees through educational sessions and forming internal groups to promote diversity for employees;
8. All policies and decisions will be applicable to all employees during their course of employment and shall purely be based on organizational needs, job requirements and individual skills, attributes and experience;
9. A robust grievance redressal mechanism is available to address any grievances or issues related to discrimination;
10. That a liaison officer is appointed who will oversee the compliance and implementation of this policy at HDFC.

5. MONITORING EQUAL OPPORTUNITY

All policies and processes will be applicable to all individuals during their course of employment with HDFC. HDFC will regularly monitor the implementation of various people processes and practices throughout an employee's life cycle to assess whether equal opportunity is being achieved or not.

Liaison Officer- A liaison officer (see Annexure 3 to be updated from time-to-time) ("**Liaison Officer**") has been appointed to oversee compliance and implementation of this policy at HDFC and report any discrepancies to the authorised person appointed at HDFC.

The Liaison Officer oversees compliance and ensures the following:

- (i) Provision of required infrastructure facilities and amenities for persons with Disabilities;
- (ii) Hiring process based on fairness, ability and merit and will ensure that no opportunity is denied to any person on ground of Disability;
- (iii) Implementation of policies and processes including but not limited to job responsibilities, training, performance review, promotion, transfers, exits;

- (iv) Provides redressal mechanism in case of any grievance raised involving unlawful discriminatory conduct; and
- (v) Suggest any changes/recommendations based on industry best practices to ensure that HDFC remains at the forefront of being an equal opportunity employer.

Any violation of this Policy shall be reported to the Liaison Officer who may inquire into the same in conjunction with relevant stakeholders and forward the same for further action to disciplinary authority.

6. WORKPLACE ADJUSTMENTS

A workplace adjustment is an agreement with the employee's respective reporting manager for the alteration of the way facilities are arranged in order to help one overcome obstacles caused by a health condition or disability and continue doing one's job well. Adjustments can be temporary, as part of rehabilitation, or permanent.

Adjustments typically fall into two categories:

- (i) Infrastructure and Equipment – for example, barrier-free accessibility within the premises, a new chair, desk, some IT kit or new software.
- (ii) The task itself – these cover the way someone performs a job. They might include regular breaks, change to working pattern or training.

At HDFC, it is our policy to make the adjustments our employees need because we are committed to making sure everyone can succeed here – no matter what their background, health status or disability.

Procedure for workplace adjustment- If any of the employee with Disability is facing difficulty doing his/her job properly because of a health condition or Disability, then they should raise the question of adjustments with their respective reporting managers.

7. MAINTENANCE OF RECORDS

HDFC shall maintain records reflecting details of the disabled person like nature of Disability, nature of work, and the facility provided.

At the time of hiring:

- (i) New joiners would need to disclose any existing Disability as defined in annexure 1;
- (ii) The individual will be required to submit the Disability Certificate from the Government authorised personnel; and
- (iii) Recruitment team will ensure the provisions are available in the candidate application form to capture the Disability details.

For existing employees:

- (i) In course of employment with HDFC, any employee who wants to be covered by the Act, should contact their respective local HR representative. The declaration of Disability will be completely on voluntary grounds and will be kept confidential.

8. COMMUNICATION OF POLICY

- (i) The Policy has been updated on HDFC's intranet.
- (ii) Suitable material will also be included in HDFC publications, management conferences and supervisory training courses.
- (iii) All employees at the time of joining will be taken through the Policy during their induction.

Annexure 1

SPECIFIED DISABILITY: (As mentioned in the Rights of People with Disabilities Act, 2016, THE GAZETTE OF INDIA EXTRAORDINARY, THE SCHEDULE)

1. Physical disability –

A. Locomotor disability (a person's inability to execute distinctive activities associated with movement of self and objects resulting from affliction of musculoskeletal or nervous system or both), including—

(a) "**leprosy cured person**" means a person who has been cured of leprosy but is suffering from—

- (i) loss of sensation in hands or feet as well as loss of sensation and paresis in the eye and eye-lid but with no manifest deformity;
- (ii) manifest deformity and paresis but having sufficient mobility in their hands and feet to enable them to engage in normal economic activity;
- (iii) extreme physical deformity as well as advanced age which prevents him/her from undertaking any gainful occupation, and the expression "leprosy cured" shall construed accordingly;

(b) "**cerebral palsy**" means a Group of non-progressive neurological condition affecting body movements and muscle coordination, caused by damage to one or more specific areas of the brain, usually occurring before, during or shortly after birth;

(c) "**dwarfism**" means a medical or genetic condition resulting in an adult height of 4 feet 10 inches (147 centimetres) or less;

(d) "**muscular dystrophy**" means a group of hereditary genetic muscle disease that weakens the muscles that move the human body and persons with multiple dystrophy have incorrect and missing information in their genes, which prevents them from making the proteins they need for healthy muscles. It is characterised by progressive skeletal muscle weakness, defects in muscle proteins, and the death of muscle cells and tissue;

(e) "**acid attack victims**" means a person disfigured due to violent assaults by throwing of acid or similar corrosive substance.

B. Visual impairment —

(a) "**blindness**" means a condition where a person has any of the following conditions, after best correction—

- (i) total absence of sight; or
- (ii) visual acuity less than 3/60 or less than 10/200 (Snellen) in the better eye with best possible correction; or
- (iii) limitation of the field of vision subtending an angle of less than 10 degree.

(b) **"low-vision"** means a condition where a person has any of the following conditions namely:

- (i) visual acuity not exceeding 6/18 or less than 20/60 upto 3/60 or upto 10/200 (Snellen) in the better eye with best possible corrections; or
- (ii) limitation of the field of vision subtending an angle of less than 40 degree up to 10 degree.

C. Hearing impairment

(a) **"deaf"** means persons having 70 DB hearing loss in speech frequencies in both ears;

(b) **"hard of hearing"** means person having 60 DB to 70 DB hearing loss in speech frequencies in both ears;

D. "speech and language disability" mean a permanent disability arising out of conditions such as laryngectomy or aphasia affecting one or more components of speech and language due to organic or neurological causes.

2. Intellectual disability, a condition characterised by significant limitation both in intellectual functioning (reasoning, learning, problem solving) and in adaptive behaviour which covers a range of every day, social and practical skills, including—

A. "specific learning disabilities" means a heterogeneous group of conditions wherein there is a deficit in processing language, spoken or written, that may manifest itself as a difficulty to comprehend, speak, read, write, spell, or to do mathematical calculations and includes such conditions as perceptual disabilities, dyslexia, dysgraphia, dyscalculia, dyspraxia and developmental aphasia;

B. "autism spectrum disorder" means a neuro-developmental condition typically appearing in the first three years of life that significantly affects a person's ability to communicate, understand relationships and relate to others, and is frequently associated with unusual or stereotypical rituals or behaviours.

3. Mental behaviour, "mental illness" means a substantial disorder of thinking, mood, perception, orientation or memory that grossly impairs judgment, behaviour, capacity to recognise reality or ability to meet the ordinary demands of life but does not include retardation which is a condition of arrested or incomplete development of mind of a person, specially characterised by sub normality of intelligence.

4. Disability caused due to—

A. Chronic neurological conditions, such as—

- (a) "**multiple sclerosis**" means an inflammatory, nervous system disease in which the myelin sheaths around the axons of nerve cells of the brain and spinal cord are damaged, leading to demyelination and affecting the ability of nerve cells in the brain and spinal cord to communicate with each other;
- (b) "**parkinson's disease**" means a progressive disease of the nervous system marked by tremor, muscular rigidity, and slow, imprecise movement, chiefly affecting middle-aged and elderly people associated with degeneration of the basal ganglia of the brain and a deficiency of the neurotransmitter dopamine.

B. Blood disorder—

- (a) "**haemophilia**" means an inheritable disease, usually affecting only male but transmitted by women to their male children, characterised by loss or impairment of the normal clotting ability of blood so that a minor would may result in fatal bleeding;
- (b) "**thalassemia**" means a group of inherited disorders characterised by reduced or absent amounts of haemoglobin.
- (c) "**sickle cell disease**" means a hemolytic disorder characterised by chronic anaemia, painful events, and various complications due to associated tissue and organ damage; "hemolytic" refers to the destruction of the cell membrane of red blood cells resulting in the release of haemoglobin.

5. Multiple Disabilities (more than one of the above specified disabilities) including deaf blindness which means a condition in which a person may have combination of hearing and visual impairments causing severe communication, developmental, and educational problems.

6. Any other category as may be notified by the Central Government.

Annexure 2

CERTIFICATION OF SPECIFIED DISABILITIES: (As mentioned in the Rights of People with Disabilities Act, 2016, THE GAZETTE OF INDIA EXTRAORDINARY, THE SCHEDULE)

The Act defines that the Central Government shall notify guidelines for the purpose of assessing the extent of specified disability in a person.

- The appropriate Government shall designate persons, having requisite qualifications and experience, as certifying authorities, who shall be competent to issue the certificate of disability.
- The appropriate Government shall also notify the jurisdiction within which and the terms and conditions subject to which, the certifying authority shall perform its certification functions.
- Any person with specified disability, may apply, in such manner as may be prescribed by the Central Government, to a certifying authority having jurisdiction, for issuing of a certificate of disability.
- On receipt of an application under sub-section (1), the certifying authority shall assess the disability of the concerned person in accordance with relevant guidelines notified under section 56, and shall, after such assessment, as the case may be,
 - issue a certificate of disability to such person, in such form as may be prescribed by the Central Government;
 - inform him in writing that he has no specified disability.
- The certificate of disability issued under this section shall be valid across the country
- An authorised medical authority or any other competent authority in the district of residence of applicant or any concerned medical authority in a Government hospital where he may have undergone treatment in connection with his disability can issue a certificate of disability.

Annexure 3

Details of Liaison Officer			
Name	Contact Number	E-mail Id	Last Updated on
Sunder Skandan	022-66316280	sunders@hdfc.com	21.1.2019