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EQUAL OPPORTUNITY POLICY

Preamble and Overview

At Gujarat Mineral Development Corporation Limited (GMDC), we recognise the value of a diverse workforce. We are committed to providing equal opportunities in employment and creating an inclusive workplace and work culture in which all employees are treated with respect and dignity.

At GMDC, workforce diversity is a business imperative. We will strive to ensure that our workforce is representative of all sections of the society. We believe that, by doing so, we would be better equipped to develop and deliver accessible and inclusive products and services. In this way, we hope to be able to meet the needs of our clients and customers better thus producing business excellence. At GMDC, we will proactively work towards ensuring that at least 4% of our workforce is comprised of people with benchmark disability, which is a conservative estimate of their representation in the general population.

This Equal Opportunity Policy is in accordance with the section 21 of The Rights of Persons with Disabilities Act, 2016 . At GMDC, we commit to conform not just to the letter but also to the spirit of the Act.

To ensure seamless implementation of this policy, GMDC has created a strategic plan and modified the related employee policies and processes. The plan has been devised on the basis of advice from relevant organizations as well as in consultation with appropriate employee representatives.

Policy Statement

GMDC is committed to eliminating all forms of unlawful discrimination (which includes direct discrimination, indirect discrimination and denial of reasonable accommodation), bullying and harassment of people with disabilities.

At GMDC, we continuously strive to ensure that all our facilities, technologies, information and privileges are accessible to people with disabilities.

We encourage candidates with different disabilities to apply. Our decisions on employment, career progression, training or any other benefits are solely based on merit. We follow an inclusive evaluation process by ensuring that a person with disability is provided with any suitable flexibility and accommodation that may be required so that

she/he may be evaluated fairly. Any information shared by employee on disability/medical condition will remain confidential.

If an employee acquires a disability during her/his employment tenure she/he can return to work at the same rank as before. In case the employee is unable to perform the current job, the organisation will invest in re-skilling the employee for another position at the same rank or higher.

GMDC is committed to promoting awareness on equal opportunity and inclusion of people with disabilities among all employees by organising training and sensitisation programmes and campaigns.

Scope

The Policy covers all persons with disabilities. They could be job applicants, full time/part time employees, interns/trainees, contractual employees, including temporary employees. It also covers those employees who acquire disability during their work tenure.

The Policy applies to all aspects of employment, be it recruitment, training, working conditions, salaries, transfers, employee benefits and career advancement.

Definitions as per the RPWD Act, 2016

“Person with disability” means a person with long term physical, mental, intellectual or sensory impairment which, in interaction with barriers, hinders his or her full and effective participation in society equally with others.

“Person with benchmark disability” means a person with not less than forty per cent 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.

“Specified disabilities” are the disability categories mentioned in the Schedule of the Rights of Persons with Disabilities Act, 2016.

There is also any other category, which allows Central Government to add any other disability by issuing a notification. The disability categories as mentioned in the Schedule are:

- ❖ Locomotor disability
- ❖ Muscular Dystrophy
- ❖ Leprosy cured
- ❖ Dwarfism

- ❖ Cerebral Palsy
- ❖ Acid attack Victim
- ❖ Low vision
- ❖ Blindness
- ❖ Hearing Handicapped
- ❖ Speech and Language disability
- ❖ Intellectual Disability
- ❖ Specific Learning Disability
- ❖ Autism Spectrum Disorder
- ❖ Mental illness
- ❖ Chronic Neurological Conditions
- ❖ Multiple sclerosis
- ❖ Parkinson's disease
- ❖ Haemophilia
- ❖ Thalassemia
- ❖ Sickle Cell disease
- ❖ Multiple Disabilities
- ❖ Any other category (as may be notified by the Central Government.)

"High support" means an intensive support, physical, psychological and otherwise, which may be required by a person with benchmark disability for daily activities, to take independent and informed decision to access facilities and participating in all areas of life including education, employment, family and community life and treatment and therapy.

"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.

"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.

Policy Details

1. Facilities and amenities

a) Physical Infrastructure

GMDC aims to ensure that our physical infrastructure (buildings, furniture, facilities and services in the building/campus) adheres to the accessibility Standards given in The Harmonized Guidelines and Space Standards for Barrier Free Built Environment for Persons with Disabilities and Elderly Persons, 2016 and the National Building Code, 2016.

GMDC also aims to revamp its existing buildings to ensure compliance with the Standards.

Any new facility that is built or renovated or leased or rented will be evaluated for compliance with accessibility Standards at different stages of the building construction.

Any employee facing accessibility issues should report to the facilities team at their location or write to the Liaison Officer.

b) Digital Infrastructure

It is GMDC's continuous endeavour to ensure that all our documents, communication and information technology systems adhere to the accessibility standards.

The Standards for Information and Communication Technology as given in the RPWD Rules 2017 are-

- (i) Website Standards: Guidelines for Indian Government Websites (GIGW), as adopted by Department of Administrative Reforms and Public Grievances, Government of India.
- (ii) Documents Standards: Electronic Publication (ePUB) or Optical Character Reader (OCR) based pdf formats.

We will ensure that only accessible technologies are procured. Any employee facing accessibility challenges can reach out to the local IT support team or write to Liaison Officer.

c) Reasonable Accommodation

GMDC will make reasonable accommodations, whenever necessary, for qualified employees or job applicants who have disabilities, as per The RPWD Act. Such accommodation would be provided: 1) to ensure equal opportunity in the application and selection process, 2) to enable an employee with a disability to perform the essential functions of a job, and 3) to enable an employee with a disability to enjoy the same benefits and privileges of employment as non-disabled employees.

Examples of reasonable accommodations may include (but not limited to) acquiring or modifying equipment or devices, modifying assessment and training materials, modifying work schedules, reassignment to a vacant position.

All documents concerning an employee's reasonable accommodations request would be maintained in the employee's confidential file, separate from the employee's official personnel file.

If an employee acquire a disability during her/his employment tenure she/he can return to work at the same rank as before. In case the employee is unable to perform the current job, the organisation will invest in re-skilling the employee for another position at the same rank or higher.

2. List of positions identified

In GMDC, various cadre wise positions have been identified which are open for people with all types of disabilities. The list of such posts is annexed at Annexure-1 & 2 of this policy document. The recruitment is purely based on merit and the candidates are evaluated based upon their skills and competence. Flexibility and accommodations will be provided to persons with disabilities on an individual basis as detailed in the subsequent section.

3. Manner of selection

a) Vacancy advertisement and application

- ❖ Wherever possible, all vacancies will be advertised internally and externally.
- ❖ All vacancy advertisements will include an appropriate short statement on equal opportunities for people with disabilities.
- ❖ Selection criteria (job description and employee specification) will be kept under constant review to ensure that they are non-discriminatory and that they relate purely to the skills needed for the job and nothing else.
- ❖ Application forms will be made available in alternate formats, based on request.

b) Selection Process

- ❖ For any positions advertised, candidates must possess minimum education & experience as prescribed.
- ❖ All candidates considered eligible must undergo an aptitude test/interview.
- ❖ Each interviewer is mandated to record her/his comments on the candidate's capability in the Interview Evaluation Form. Reasons for rejection must be objective and not related to the person's disability.

- ❖ Age relaxation may be granted for upper age limit as per the standard norms of state/central Govt.
- ❖ During recruitment process, no application fee is levied from persons with disabilities.

4. Other facilities

a) Training and Career development

GMDC will endeavour to provide course materials meant for induction and training in accessible formats on request. The request for reasonable accommodation, such as assistive aids, accessible training venue, accessible materials, interpreter, scribe, etc. should be placed at least one week prior to the scheduled date of commencement of induction/training.

The company has an accessible and inclusive appraisal process. Any employee requiring any accommodations for an appraisal process must place a request with the Liaison Officer at least two days in advance.

The establishment conducts yearly training programmes on Objective Performance Appraisal Process' for all employees.

b) Disability Leave

An employee's request for extra leave, for a reason related to her/his disability, will be treated as a request for reasonable accommodation and will be evaluated accordingly.

GMDC provides an option of unpaid special leave for a maximum period of three months for employees with disabilities who plan to undergo medical treatment.

c) Employee Engagement and social inclusion

GMDC will Endeavour to make all company events and meetings inclusive by ensuring that these are conducted at accessible venues with a provision of reasonable accommodation being available to employees with disabilities. GMDC will provide reasonable flexibility & preference while allotting residential accommodation/guest house facilities at places where GMDC provides residential facilities to its employees.

d) Special Medical Facility:

In case of benchmark disability of dependent family member of employee GMDC provides special medical facility to that dependent family member wherein the medical benefit is extended without any age limit.

e) Transport Allowance:

GMDC provides Transport Allowance/ conveyance as per extant Government of India guidelines. Transport Allowance/ conveyance to employees with disabilities is provided at double the normal rate where conveyance allowance is payable.

f) Provisions for assistive devices, barrier free accessibility and other provisions for persons with disabilities.

GMDC will make provision for assistive devices and provide barrier free accessibility at its various offices.

e) Appointment of Liaison Officer.

For this purpose, GMDC has appointed Shri Rajiv Parekh, Deputy General Manager, (HR) as the Liaison officer.

The Liaison Officer is responsible for:

- ❖ Implementing the action plan for making the workplace and IT systems accessible for people with disabilities by liaison with the various Projects & departments in the organization. There will be a committee consisting of Project Head, Officer from HR Department & Officer of Civil Department for each Projects of GMDC to comply the provisions of RPWD Act 2016 & shall coordinate with Liaison Officer of GMDC in timely manner for implementation of this act.
- ❖ Ensuring that all employees are aware of the Equal Opportunity Policy and knows their duties and rights in relation to the Equal Employment Opportunity policy.
- ❖ To look after & ensure reservation matters relating to person with benchmark disability.
- ❖ Developing proactive strategies to prevent discrimination and harassment.

The Liaison Officer will share the progress report with the HR Head who would then present the progress report to the MD/Competent Authority, GMDC.

All employees have the responsibility to comply with the Equal Opportunity Policy. Managers and team members need to monitor the work environment to ensure that it is free from discrimination and harassment and encourages inclusion and respect for others.

All employees are encouraged to report any incidents of violation of this policy and Managers should act promptly when concerns arise or complaints are made.

5. Governance Framework

The Grievance Officer is responsible for ensuring that the establishment operates in compliance with The RPWD Act, 2016 and to fulfil the terms of this Policy. The HR Head takes a lead in implementing the programme and shall strive for planning, monitoring and reviewing the programme's progress to ensure compliance with the Policy.

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6. Maintenance of Records

GMDC will collect and maintain data regarding employees with disabilities in relation to their employment, facilities provided and other necessary information as per The RPWD Act. All employees will be asked to fill the Voluntary Disability Self Identification Form in order to give information regarding any disability that she/he may have. An employee can edit the information at any time during her/his tenure. There will be no penalties imposed because she/he did not share information regarding her/his disability earlier. An employee who acquires disability can also edit and update the form.

The information that an employee shares about her/his disability will be kept confidential. It will be maintained in a separate file and not in her/his personal file. Exceptions to the confidentiality clause:

- 1) HoD's may be given information about an employee's disability for allowing/providing any accommodations.
- 2) Security personnel may be given information about an employee's disability so as to facilitate obtaining any necessary support during an emergency.
- 3) Government officials who are investigating the compliance with The RPWD Act may be given information about an employee's disability.

7. Grievance Redressal

Employees with disability have the right to file a complaint concerning any discrimination with the Grievance Officer who then reports to the Grievance Committee. Any policy violation i.e. when any person with disability is discriminated against or not provided reasonable accommodation or denied access to any company facility, will be regarded as a grievance. GMDC has appointed Shri Joel Evans, Company Secretary as the Nodal Officer for Grievance Redressal. He is trained in handling grievances related to disability discrimination and harassment. The Grievance Officer will maintain all records related to grievances and submit the grievance details to below committee for necessary redressal.

The Grievance Committee shall consist of following:

- ❖ Chairperson of the Committee – Shri Rajat Dash, GM (M&S)
- ❖ Two employees at or above the General Manager level (one male and one female employee). – 1) Shri S D Dav, GM (HR) 2) Smt A K Iyer, GM (A/cs) & CFO
- ❖ Two employee representatives with disabilities (one male and one female employee). – Shri Khimji Karmur, AME, Smt. Kashmira Gajjar, Asst.
- ❖ One external member from a disability organization who is familiar with issues of discrimination on the basis of disability may be invited as & when required.

The tenure of the members of the Committee will be 3 years.

The Grievance Officer and the Committee will follow the procedure of Grievance redressal as outlined in the Guidelines for conducting the Enquiry.

On investigation, if the employee against whom the complaint has been made is found guilty of discriminatory behaviour, she/he will be subjected to disciplinary actions.

Possible action taken against the employee may include a reprimand, detraction of benefits for a definite or indefinite time period, demotion, denial of promotion and suspension or termination for more serious offences. Involuntary or indirect discrimination will be resolved through training, counselling and suitable modification of procedures when required to ensure fair treatment.

8.Affirmative Action

GMDC, for the purpose of promoting equality of opportunity, seeks to increase the representation of people with disabilities using suitable recruitment and outreach efforts. These include, but is not limited to:

1) Participation in job fairs, training and scholarship programmes and organising special recruitment drives and training and employment of people with disabilities who have high support needs.

2) A certain percentage of the CSR budget will be allocated for supporting disability programmes.

9. Managing Director, GMDC is empowered & authorised to interpret, clarify, revise, amend/modify or discontinue any or all the provisions of this policy in accordance with Govt of Guj/Govt of India guidelines or any representation received in this regards if found appropriate from time to time.

Date : 26 Mar 2025


General Manager (HR)

