

MANAKSIA ALUMINIUM COMPANY LIMITED

EQUAL OPPORTUNITY POLICY FOR PERSONS WITH DISABILITIES

Overview

Our Company is committed to provide equal opportunities to all its employees / personnel and all qualified applicants for employment, without regard to their race, caste, religion, colour, ancestry, marital status, work experience, gender, sexual orientation, age, nationality, ethnic origin or disability and to foster an inclusive workplace where all employees are treated with respect and dignity.

Our Company strives to ensure that our workforce is representative of all sections of the society. We believe that this would help us to 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 the society and customers better, thus producing business excellence.

The Company has devised this policy on equal opportunity for persons with disabilities ("Policy") to protect the interests of persons with Disabilities employed with it. The Policy outlines our Company's approach towards disabled employees.

This Policy is in accordance with the provisions of The Rights of Persons with Disabilities Act, 2016 and The Rights of Persons with Disabilities Rules, 2017 ("Act") and has been adopted by the Board of Directors of the Company vide its meeting held on 08th August, 2025. The Company will always abide by the principles of the Policy in letter and in spirit.

Scope

The Policy covers all employees with disabilities including 'Persons with disability' (as defined below), Specified Disability(ies) (as defined below), 'Persons with benchmark disability' (as defined below) and employee(s) having 'High Support' needs (as defined below) (all collectively defined as "Disability(ies)") as declared by the employee.

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.

Definitions as per the Act

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

"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. It

also includes a person with disability where specified disability has been defined in measurable terms by a certifying authority.

“Specified disabilities” are the disability categories mentioned in the Schedule of the Act. There is also “any other category”, which allows the Central Government to add any other disability by issuing a notification.

The disability categories as mentioned in the Schedule are:

1. Locomotor disability
2. Muscular Dystrophy
3. Leprosy cured
4. Dwarfism
5. Cerebral Palsy
6. Acid attack Victim
7. Low vision
8. Blindness
9. Deafness
10. Hard of Hearing
11. Speech and Language disability
12. Intellectual Disability
13. Specific Learning Disability
14. Autism Spectrum Disorder
15. Mental illness
16. Chronic Neurological Conditions
17. Multiple sclerosis
18. Parkinson’s disease
19. Haemophilia
20. Thalassemia
21. Sickle Cell disease
22. Multiple Disabilities
23. 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 persons with disabilities enjoy or exercise equal rights as others.

POLICY DETAILS

1. Facilities & Amenities:

a) Physical infrastructure:

The Company will ensure that suitable and appropriate facilities and infrastructure are provided to employees with Disabilities to enable them to effectively discharge their duties in the establishment.

The Company shall use its best efforts to ensure that its physical infrastructure (buildings, furniture, facilities and services in the building/campus) adheres to the accessibility standards given in the Harmonised Guidelines and Space Standards for Barrier Free Built Environment for Persons with Disabilities and Elderly Persons, 2016 and the National Building Code, 2016. Where its not possible to do so, the Company shall use its best efforts to cater, to the extent it can, to the needs of all employees in its existing buildings. The Company shall use its best efforts to offer specially tailored programmes for employees with Disabilities.

b) Digital infrastructure:

It is the Company's continuous endeavour to ensure that all its documents, communication and information technology systems adhere to the accessibility standards. The Company shall use its best efforts to ensure that its digital infrastructure adequately caters to the needs and requirements of Disabled employees.

2. List of positions offered

The Company recruits people with disabilities at all positions of the Company. The hiring is purely based on merit and candidates are evaluated based on their skills and competence. While all candidates can apply to all available job and positions, certain kind of jobs may not be suitable and may impact health and safety of candidates with Disabilities, for instance, field jobs. In such a scenario, the Company shall, use its best efforts to offer skilled and qualified candidates other roles as appropriate.

3. Manner of selection

a) Vacancy advertisement and application: Open positions are published on Company's career site, social media and job portals. These positions are open to people with Disabilities subject to Clause 2 above. Our key focus is to ensure that all our existing sourcing channels and methods are inclusive and to collaborate with disability organizations to attract suitable talent.

b) Selection process: The selection process is and shall be the same for all candidates. However, reasonable flexibility and accommodation is and will be provided to job applicants with Disabilities as required.

4. Post Recruitment Training*

The Company conducts induction trainings, job specific post-recruitment trainings of all the employees together. However, as the case may be, special training for persons with disability is conducted to enable them to carry out their jobs effectively. Pre-promotion training shall be imparted to Persons with disabilities opting for promotion from Sub staff to Clerical cadre.

5. Leave

The employees with disabilities are governed by the rules of leave as is applicable in the Company.

6. Maintenance of records

The Company shall maintain, below mentioned records reflecting details of the Disabled persons employed:

- a) Number of persons with Disability(ies) employed with the respective date of commencement of employment;
- b) Name, gender and address of the persons with Disability(ies);
- c) Nature of Disability of such persons;
- d) Nature of work rendered by such Disabled person; and
- e) Kind of facilities provided to persons with Disability(ies).

The records maintained shall be open to inspection at all reasonable hours to such persons as may be authorised. Confidentiality of the data will be maintained with access being provided only to employees who have a 'need to know', for instance, in order to provide security, to ensure provision of reasonable accommodations, etc.

7. Liaison Officer

The Company shall always have a Liaison Officer, for persons with Disabilities as per the mandate of the Central Rules under the RPWD Act. Such Liaison Officer will coordinate with the various concerned departments and shall be responsible for ensuring that employees and job applicants with Disability(ies) receive reasonable accommodation for performing their job and participating in the selection process on an equal basis with others. He/she will also raise awareness among all employees in the Company to create an inclusive work environment. The board of directors of the Company shall appoint the Liaison Officer for the purposes of this Policy.

Grievance Redressal

The organization ensures that grievances would be thoroughly inquired by the designated persons independently and fairly. While the company considers the malpractices or wrongdoing or abuse or harassments in general, it is also conscious of the likelihood of any direct or indirect discrimination or denial of reasonable accommodation or bullying behaviour towards employees with disability and would treat such instances also, as malpractice, abuse or harassment, as the case may be.

The organization will follow the same procedure for inquiring and investigating the complaints or concerns raised by employees with disability.

However, necessary reasonable accommodation will be provided to employees with disabilities to effectively participate in the investigation process.

For example, sign language interpreter for persons with deafness, accessible venue for persons with locomotor disability, etc.

Employees can reach out to their manage/HR manager to voice concerns. If an employee raises a concern, he/she will not be under any risk in the form of retribution or retaliation. The company will not tolerate any harassment or victimization (informal pressures) against any employees raising concerns who have a genuine case and will take appropriate action accordingly.