

# Equal Opportunity Policy for Persons with Disability

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(UNDER THE RIGHTS OF PERSONS WITH DISABILITIES ACT, 2016)

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## Revision history

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At Acuity Knowledge Partners (Acuity), workforce diversity is a business imperative. We strive to ensure that our workforce is representative of all sections of society. Our Equal Opportunity Policy is structured in accordance with the provisions of the Rights of People with Disabilities (RPWD) Act, 2016, and we are committed not just to the letter but also to the spirit of the Act.

- a. Acuity complies with the provisions of the RPWD Act, 2016
- b. The company ensures equal opportunity in all aspects of employment for persons with benchmark disabilities (PwBDs) and
- c. The Act creates and maintains a non-discriminatory and inclusive work environment that ensures reasonable career growth opportunities for PwBDs and for those who acquire disability during their employment tenure

Acuity's Chief HR Officer (CHRO) or designated approving authority may approve exceptions to the stated policy.

## Objectives

The key objectives of this policy are listed below:

- a. To provide facilities and amenities to people with disabilities and thus enable them to effectively discharge their duties in the establishment
- b. To identify posts suitable for persons with disabilities
- c. To provide provisions for assistive devices, barrier-free accessibility and other provisions for persons with disabilities
- d. To ensure a liaison officer (D&I lead) looks after the recruitment of persons with disabilities and the provision of facilities and amenities for such employees

## Coverage

This policy covers all persons with disabilities. They could be job applicants, full-time/part-time employees, interns/trainees and contractual employees, including temporary employees. It also covers employees who acquire disability during their work tenure. This policy applies to all aspects of employment, be it recruitment, training, working conditions, salaries, transfers, employee benefits or career advancement.

## Definitions as per the RPWD Act

- "Person with disability" means a person with long-term physical, mental, intellectual or sensory impairment, which, in interaction with barriers, hinders their full and effective participation in society equally with others.
- "Person with benchmark disability" means a person with not less than 40% of a specified disability, where the specified disability has not been defined in measurable terms; also includes a person with disability, where specified disability has been defined in measurable terms, as certified by the certifying authority.
- "High support" means intensive support – physical, psychological and otherwise – that may be required by a person with benchmark disability for daily activities to take independent and informed decisions to access facilities and participate 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 or restriction based on 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; this 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.

## Governance framework

The CHRO is responsible for ensuring that the establishment operates in compliance with the RPWD Act, 2016, and for fulfilling the terms of this policy. Grievance Redressal Officer (**Parul Dhir**) takes initiative to implement the programme and plan, monitor and review its progress to ensure compliance with company policy.

### Grievance Redressal Officer

As per the mandate of the RPWD Act, 2016, Acuity has appointed Parul Dhir (D&I Lead) as Grievance Redressal officer. She is responsible for taking initiative and providing the support needed to realise the goals of an inclusive and accessible workplace and reasonable accommodation.

The Grievance Redressal Officer is responsible for the following:

- Implementing the action plan to make the workplace and IT systems accessible for people with disabilities by liaising with departments in the organisation
- Ensuring that all employees are aware of the Equal Opportunity Policy and know their duties and rights in relation to the policy and
- Developing proactive strategies to prevent discrimination and harassment

The Grievance Redressal Officer will share the quarterly progress report with the CHRO, who would then present the progress report to the CEO and the board.

All employees have the responsibility to comply with the Equal Opportunity Policy.

Managers and team members need to monitor the work environment to ensure it not only remains free from discrimination and harassment but also 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.

## Maintenance of records

Acuity 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 in the Voluntary Disability Self Identification Form to give information on any disability they may have. Employees can edit the information at any time during their tenure. No penalties are imposed if employees do not provide information regarding their disability. An employee who acquires disability can also edit and update the form.

Information an employee shares about their disability will be kept confidential and maintained in a separate file, and not in their personal file.

### Exceptions to the confidentiality clause:

- i. Managers/supervisors may be given information about an employee's disability to allow/provide for any accommodations.
- ii. Security personnel may be given information about an employee's disability to facilitate necessary support during an emergency.
- iii. Government officials who are investigating compliance with the RPWD Act may be given information about an employee's disability.

**The following particulars shall be maintained by the Grievance Redressal officer as on 31 December of every year:**

- a. The number of persons with disabilities who are employed and their date of joining
- b. The name, gender and address of persons with disabilities
- c. The nature of disability of such persons
- d. The nature of work being rendered by such employed persons with disability
- e. The kind of facilities being provided to such persons with disabilities

## Grievance redressal

The Grievance Redressal Mechanism would operate as given below:

Employees with disabilities can have their grievances addressed by writing to the Grievance Redressal Officer, Parul Dhir, at [parul.dhir@acuitykp.com](mailto:parul.dhir@acuitykp.com), or send an email to the grievance cell at [grievancecell@acuitykp.com](mailto:grievancecell@acuitykp.com).

All grievances of employees with disabilities shall be duly investigated and a register of complaints shall be maintained, containing particulars as required by the RPWD Act. The complaints of employees with disabilities shall be inquired within two weeks of registration.

## Affirmative action

### Facilities and amenities

- i. Acuity shall endeavour to provide physical infrastructure (buildings, furniture, facilities, services in the building/campus and transportation) that adheres to accessibility standards as prescribed by the Government of India.
- ii. Acuity also aims to revamp its existing buildings to ensure compliance with RPWD act Any new facility built, renovated, leased or rented will be evaluated for compliance with accessibility standards at different stages of building construction. Employees facing accessibility issues should report this to the liaison officer through the proper channel.

### Training and career development

Acuity shall provide course materials meant for induction and training in accessible formats on request.

### Recruitment efforts

Acuity, 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 are not limited to, **participation in job fairs**; scheduling of training sessions, scholarship programmes and special recruitment drives; and employment of people with disabilities who have high support needs.

### Disability leave

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

Acuity provides an option of paid special leave for a maximum of two weeks for employees with disabilities who plan to undergo medical treatment.

### Travel, stay and transport

For official travel (local, outstation and international), employees with disabilities will be provided accessible modes of transport. Air travel (in case road/train travel is inaccessible), accessible guest houses and hotels and a personal attendant to travel along may be provided as per extant provisions on travelling/halting/lodging.

## Employee engagement and social inclusion

Acuity endeavours to make all events and meetings inclusive by ensuring these are conducted at accessible venues, with provision for reasonable accommodation being available to employees with disabilities.

**Corporate social responsibility (CSR):** A certain percentage of the CSR budget can be allocated to support disability programmes.

# ANNEXURE 1

## SPECIFIED DISABILITY

### 1. Physical disability

**A. Locomotor disability** (inability to execute activities associated with movement of self and objects, resulting from affliction of musculoskeletal or nervous system, or both)

- (a) "Leprosy-cured person" means a person who has been cured of leprosy but has
  - (i) loss of sensation in hands or feet, as well as loss of sensation and paresis in the eye and eyelid, but with no manifest deformity
  - (ii) manifest deformity and paresis but with 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 the person from undertaking gainful occupation, and the expression "leprosy cured" shall be construed accordingly
- (b) "Cerebral palsy" refers to 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 required for healthy muscles. It is characterised by progressive skeletal muscle weakness, defects in muscle proteins and death of muscle cells and tissue
- (e) "Acid attack victims" means a person disfigured due to violent assaults by acid or similar corrosive substance thrown at them

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

### (C) Hearing impairment

- (a) "Deaf" refers to persons with 70 DB hearing loss in speech frequencies in both ears
- (b) "Hard of hearing" means person having 60 DB–70 DB hearing loss in speech frequencies in both ears

**D. Speech and language disability** means 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 and problem-solving) and adaptive behaviour, which covers a range of everyday social and practical skills, including

- (i) "Specific learning disabilities" mean a heterogeneous group of conditions wherein there is a deficit in processing language, spoken or written, which may manifest itself as a difficulty to comprehend, speak, read, write, spell or to do mathematical calculations and includes conditions such as perceptual disabilities, dyslexia, dysgraphia, dyscalculia, dyspraxia and developmental aphasia
- (ii) "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 judgement, 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 by

### A. Chronic neurological conditions, such as

- (i) "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
- (ii) "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

- (i) "Haemophilia" means an inheritable disease, usually affecting only males, but transmitted by women to their male children, characterised by loss or impairment of the normal clotting ability of blood so that a minor wound may result in fatal bleeding
- (ii) "Thalassemia" means a group of inherited disorders characterised by reduced or absent amounts of haemoglobin
- (iii) "Sickle cell disease" means a haemolytic disorder characterised by chronic anaemia, painful events and various complications due to associated tissue and organ damage; "haemolytic" 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 a 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



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Acuity was established as a separate business from Moody's Corporation in 2019, following its acquisition by Equistone Partners Europe (Equistone). In January 2023, funds advised by global private equity firm Permira acquired a majority stake in the business from Equistone, which remains invested as a minority shareholder.

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