



SPECTRON

Disability Accommodation Policy

Effective Date: 05.01.2026

Revision: 01

Approved By: Management

Applicability: All employees across functions and locations

1. Purpose

The purpose of this policy is to ensure equal opportunity, dignity, and inclusion for persons with disabilities by providing reasonable workplace accommodations that enable them to perform their roles effectively, without discrimination.

2. Scope

This policy applies to:

- All employees, including permanent, probationary, contractual, and temporary staff
- Job applicants and candidates during recruitment and selection
- All Company workplaces, offices, sites, and work-related activities

3. Policy Statement

The Company is committed to:

- Providing a workplace free from discrimination on the basis of disability
- Offering reasonable accommodation to qualified persons with disabilities
- Ensuring equal access to employment, growth, and career opportunities

Disability shall not be a barrier to employment or advancement where reasonable accommodation can be provided.

4. Legal Framework

This policy is framed in alignment with:

- **Rights of Persons with Disabilities Act, 2016 (RPWD Act)**
- **Constitution of India** (Articles 14, 15, and 16 – Equality and Non-discrimination)
- Applicable labour and employment laws

In case of any inconsistency, **statutory provisions shall prevail.**

5. Definition of Disability

SPECTRON ENGINEERS PRIVATE LIMITED

An ISO 9001 : 2015 Certified Company

129, Andheri Industrial Estate, Off Veera Desai Road, Andheri (W), Mumbai - 400 053, INDIA

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Disability includes long-term physical, mental, intellectual, or sensory impairments which, in interaction with barriers, may hinder full and effective participation in the workplace, as defined under applicable law.

6. Reasonable Accommodation

Reasonable accommodation refers to necessary and appropriate modifications or adjustments that:

- Enable a person with disability to perform essential job functions
- Do not impose undue hardship on business operations

Examples may include:

- Modified workstations or ergonomic aids
- Flexible working hours or remote work, where feasible
- Assistive technology or software
- Modified duties or work processes
- Physical accessibility support

7. Limitations

Accommodation may be denied or modified if it:

- Causes undue hardship to the Company
- Compromises workplace safety or statutory compliance
- Is not feasible despite reasonable alternatives

In such cases, alternative solutions may be explored.

8. How to Request Disability Accommodation

Request Procedure

1. An employee or candidate may submit a **written request** to HR or the Reporting Manager.
2. The request should include:
 - Nature of accommodation required
 - Duration (temporary or permanent)
3. Medical or supporting documents may be requested **only where necessary** and handled confidentially.
4. HR shall engage in an interactive process to identify suitable accommodation.

9. Review & Approval

- Each request shall be reviewed on a **case-by-case basis**.
- Decisions shall be based on job requirements, feasibility, and legal compliance.
- Approved accommodations shall be documented and periodically reviewed.

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10. Confidentiality

All medical or disability-related information shall be:

- Treated as strictly confidential
- Shared only on a need-to-know basis
- Stored securely in accordance with data protection policies

11. Non-Discrimination & Harassment

- Discrimination, harassment, or victimization based on disability is strictly prohibited.
- Any violation shall be addressed under the Company's disciplinary and conduct policies.

12. Roles & Responsibilities

Management & HR

- Ensure fair assessment of accommodation requests
- Promote inclusive and accessible workplace practices
- Ensure compliance with applicable laws

Employees

- Submit requests in good faith
- Cooperate in accommodation discussions
- Respect dignity and inclusion of colleagues

13. Misuse of Accommodation

Misrepresentation or misuse of accommodation provisions may result in disciplinary action as per Company policy.

14. Policy Review & Amendment

The Company reserves the right to amend, modify, or withdraw this policy to align with statutory changes or operational requirements.

Employee–HR Communication on Disability Accommodation Policy

Employee: Can I request accommodation if I have a disability or medical condition?

HR Representative: Yes. You may request reasonable accommodation to support you in performing your role effectively.

Employee: Will my medical information be kept confidential?

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HR Representative: Absolutely. Any information shared is treated confidentially and used only to assess accommodation needs.

Employee: Can my request be denied?

HR Representative: Only if it causes undue hardship, safety issues, or legal constraints. Even then, we will explore alternative options.

Employee: Thank you. This makes the workplace feel inclusive.

HR Representative: You're welcome. Inclusion and equal opportunity are core values of our organization.

Yours Sincerely,

For **Spectron Engineers Pvt. Ltd.**

Authorised Signatory

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