



HEXAGON

Reasonable Accommodation Guidelines

Equal Employment Opportunity Policy for Persons with Disabilities

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1. Introduction

As per the Equal Opportunity Policy for Persons with Disabilities, HCCI is committed to ensuring non-discrimination and equal opportunity for persons with disabilities. Denial of Reasonable Accommodation is considered as discrimination. These Guidelines include the scope and the process for providing reasonable accommodation.

Reasonable Accommodation is provided to persons with disabilities to:

- i. Participate in the application and selection process for employment on equal basis
- ii. Perform the essential functions of a job
- iii. Enjoy the same benefits and privileges of employment as others

2. Scope & Eligibility

The guidelines covers employees and job applicants with disabilities. Those covered are full time/part time/contractual/temporary employees and personnel working on our premises. It also covers those employees who acquire disability during their employment with HCCI. It is important to note that it is not compulsory to have a Disability Certificate for requesting a Reasonable Accommodation. However, the Liaison Officer may ask for medical papers from the employee/job applicants to verify or understand about the person's accommodation needs, if required.

3. Definitions

- i. "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.
- ii. "Person with benchmark disability" means a person with not less than forty per cent of a specified disability. The specified disability categories as mentioned in the Schedule of the Act are mentioned below:
 - a. Locomotor disability
 - b. Leprosy cured
 - c. Cerebral Palsy
 - d. Dwarfism
 - e. Muscular Dystrophy
 - f. Acid attack Survivor
 - g. Blindness
 - h. Low vision
 - i. Deaf
 - j. Hard of Hearing
 - k. Speech and Language disability
 - l. Intellectual Disability
 - m. Specific Learning Disability
 - n. Autism Spectrum Disorder
 - o. Mental illness
 - p. Chronic Neurological Conditions
 - q. Multiple sclerosis
 - r. Parkinson's disease
 - s. Haemophilia
 - t. Thalassemia
 - u. Sickle Cell disease

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- v. Multiple Disabilities (more than one of the above specified disabilities)
- iii. “Barrier” means any factor including communicational, cultural, economic, environmental, institutional, political, social, attitudinal, or structural factors which hampers the full and effective participation of persons with disabilities in society.
- iv. “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.
- v. “Discrimination” in relation to disability, means any distinction, exclusion, 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 and includes all forms of discrimination and denial of reasonable accommodation.
- vi. “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. Types of accommodations include the following (but not limited to):
 - a. flexibility in recruitment criteria and selection process
 - b. removing and/or substituting marginal functions of the job
 - c. modifying work schedules
 - d. altering how or when job duties are performed
 - e. working from a different office space or home
 - f. granting additional breaks or leaves
 - g. providing assistive technology, including information communication technology, or bespoke furniture
 - h. providing a sign language interpreter, or other staff assistant to enable employees to perform their job functions.
 - i. providing materials in alternative formats (e.g.,
 - j. providing reassignment to another job
 - k. job coaching
 - l. Note: Reasonable accommodation does not include removal of an essential job function. It also does not include providing items for personal use such as a hearing aid or an artificial limb or a wheelchair for personal use (wheelchairs available in the office can be used only within the office).
 - m. “communication” includes means and formats of communication, languages, display of text, alternative modes and accessible information and communication technology.
 - n. “Information and communication technology” includes all services and innovations relating to information and communication, including telecom services, web-based services, electronic and print services, digital and virtual services.
- vii. “Undue burden” refers to any accommodation that would be unduly costly, extensive, substantial, or disruptive, or that would fundamentally alter the nature or operation of the business.

4. Guidelines & Procedure

4.1 Reasonable Accommodation for job applicants

The following is the procedure for job applicants with disabilities to seek reasonable accommodation for participating in the application and selection process for employment on an equal basis with others.

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4.1.1 Placing a Request for Reasonable Accommodation

Job applicant makes a request for reasonable accommodation/s, to participate in the selection process, by contacting the Recruiter by mail/phone to their talent acquisition representative.

4.1.2 Processing a Request and approval

- i. If the accommodation is simple to provide, the talent acquisition representative does so.
- ii. If there is a clarification required, the talent acquisition representative can contact the Liaison Officer who provides the necessary advice after interacting with the job applicant.
- iii. Further, if the Liaison Officer is unsure, or feels, that the accommodation request is not reasonable, an external Disability Consultant can be contacted for their advice.
- iv. If the nature of the accommodation request is such that it requires policy/process level modifications, the Liaison Officer should escalate the matter to the Diversity and Acceptance Council. This Committee will discuss the matter and will take the final decision.

4.1.3 Denial of requested Accommodation Request

In case the Diversity and Acceptance Council decides that the request is unreasonable, and the request is rejected, the Liaison Officer will inform the candidate regarding the decision

4.1.4 Monitoring the Accommodations

The Liaison Officer will monitor the selection process to ensure the needed accommodation is provided appropriately and in a timely manner.

4.2 Reasonable Accommodation for Employees

Any Employee with disability or an employee who has acquired disability can seek Reasonable Accommodations at the time of offer/joining or at any time during their employment tenure.

4.2.1 Placing a Request for Reasonable Accommodation

The employee requiring accommodations fills/edits the Voluntary Self Identification Form (VSIF) for Persons with Disabilities and should complete the Reasonable Accommodation (RA) Request Form. If an employee needs reasonable accommodations on a recurring basis, such as the assistance of a sign language interpreter for training and so on, note that the Reasonable Accommodation Form Request should be filled only once. However, the employee requesting the accommodation must give appropriate advance notice each time the accommodation is needed to the relevant stakeholder.

4.2.2 Processing a Request and Approval

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- i. The Liaison Officer should begin the process within two working days of receiving the request. Employees may be asked to submit their medical records and/or assessment reports by professionals.
- ii. The Liaison Officer can immediately approve requests that are easy to provide.
- iii. For certain types of requests, they may include the manager and other stakeholder/s to gather the requisite information for responding to the request. This will be done in consultation and with the consent of the employee concerned.
- iv. If the Liaison Officer feels the need to engage a specialist to advise or considers that the request is unreasonable, they may involve the external Disability Consultant for advice. The Disability Consultant may like to liaise with the employee and other relevant stakeholders, do any assessments that may be required to come up with the accommodations that may be needed in consultation with the employee.
- v. If the request for reasonable accommodation is considered as unreasonable, the matter will then be referred to the Diversity & Acceptance Council for the final decision.
- vi. In case the accommodation cannot be provided immediately, the Liaison Officer will communicate the reason for the delay.
- vii. The Liaison Officer should fill in the Resolution Form and maintain the record of the accommodations provided.

4.2.3 Denial of Reasonable Accommodation Request

In case the request is denied by the Diversity and Inclusion Committee, the Liaison Officer will inform the Employee and share the reasons for the denial.

4.2.4 Monitoring the Accommodations

Liaison Officer should seek feedback from the employee on a regular basis to check if the accommodations are working.

4.3 Time Frame for processing the request

The request for reasonable accommodation will be processed as soon as possible and no later than 30 days from the date of receiving the request. In case of extenuating circumstances, the time frame for processing the request and providing the accommodation may be extended.

5. Confidentiality

Strict confidentiality will be maintained regarding the information provided by an employee regarding their disability/medical condition. Liaison Officer may share the information with certain people on a need-to-know basis in consultation with the employee. These could be:

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- i. Reporting Managers/Supervisors/IT/Facilities Department or any other stakeholder to allow/provide accommodations.
- ii. Security personnel to facilitate the formulation of a personalized emergency preparedness plan and other security requirements.
- iii. Government officials who are inspecting/investigating a case as per The Rights of Persons with Disabilities Act (RPWD) Act or any other law.

6. Revision of the guidelines

The guidelines will be reviewed and updated annually to align with Equal Opportunity Policy for persons with disabilities by the Diversity Council along with the Liaison officer and the PWD workgroup of the D&A council.

7. Process Administration & Exceptions

Human Resources Department, in consultation with Diversity and Acceptance Council and Liaison Officer will be the guidelines arbitrator and to reach out for any support or exception.

8. Revision History

Rev.	Rev. Date	Reason for Revision	Revised By	Approved By
1.0	10-May-2023	New Policy formation on Inclusive Practices and Reasonable Accommodation	Shilpa Kankaria & Anant Gupta	Nousheen Khan & Suresh Kadambari