



HEXAGON

Equal Employment Opportunity Policy for Persons with Disabilities (PwD)

Inclusive Practices and Reasonable Accommodation

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1. Introduction

1.1 Vision

Hexagon AB's vision is a future where data is fully and autonomously leveraged so that business, industry, and humanity sustainably thrive. A world where economic growth does not come at the expense of the planet and people. As a global leader in sensor, software and autonomous solutions, Hexagon is an enabler of sustainability, with solutions that improve efficiency, quality and safety across a broad array of industries and societies. Hexagon takes a holistic approach to sustainability which includes its environmental, social and governance impacts (ESG) in the whole value chain.

1.2 Driving sustainability through its culture and people

Attracting, hiring, developing and long-term retention of the best employees in the industry is key to Hexagon's success. Hexagon is committed to a diverse workplace mirroring the international nature of the business – with employees, customers, and suppliers across the world. As a global organisation, Hexagon recognises and respects employees' differences, and strives to build a working environment where different values and perspectives are actively harnessed to create the best solutions for the equally diverse customer base. By promoting diversity, Hexagon will also increase access to a greater range of talent. The Hexagon Code of Business Conduct and Ethics helps govern issues such as fair employment, diversity, discrimination, harassment and health and safety.

To operationalise this commitment in India from a disability diversity standpoint and to meet the requirements of the Rights of Persons with Disabilities (RPWD) Act, 2016, HCCI has framed this policy.

HCCI is committed to complying with the provisions enshrined under The Rights of Persons with Disabilities Act, 2016, and its Central Rules 2017. HCCI is committed to taking steps to ensure that:

- i. Persons with disabilities are not discriminated against in any aspect of employment on the grounds of disability.
- ii. Reasonable accommodations are provided for job applicants and employees with disabilities based on their individual needs.
- iii. Accessibility standards for physical and digital infrastructure are adhered to.
- iv. Liaison officer is designated to ensure the effective implementation of the Policy.
- v. Grievance Redressal mechanism is in place for addressing matters related to discrimination /harassment of persons with disabilities.
- vi. Record of persons with disabilities is maintained in relation to the matter of employment, facilities/high support provided and other necessary information in compliance with the provisions of the Act.
- vii. The Policy is displayed on the Company's website and at conspicuous places in the Company's premises.

2. Scope & Eligibility

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The Policy applies to persons with disabilities. They could be job applicants, full-time/part-time/fixed term/temporary employees, interns/trainees, contractual employees, and personnel of a vendor working for HCCI. It also applies to those employees who acquire disability during their employment with HCCI.

This policy is applicable throughout the recruitment and employment lifecycle of an individual, right from the recruitment process till separation from employment or superannuation. It covers all aspects of employment such as recruitment, training, working conditions, salaries, transfers, employee benefits, career advancement and other. It also covers the physical & Information and Communication Technology infrastructure, all modes and forms of communication, human interactions, other policies & processes, and the facilities & amenities relevant for employment.

3. Definitions

Terms and their definitions based on Rights of Persons with Disabilities (RPWD) Act, 2016

- 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 other.
- 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.
 - Locomotor disability
 - Leprosy cured
 - Cerebral Palsy
 - Dwarfism
 - Muscular Dystrophy
 - Acid attack Survivor
 - Blindness
 - Low vision
 - Deaf
 - Hard of Hearing
 - 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 (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.

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- 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
- vii. “Communication” includes means and formats of communication, languages, display of text, alternative modes and accessible information and communication technology.
- viii. “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.

4. Guidelines

4.1 Non-Discrimination in Employment

HCCI is committed to promote a workplace that is free from any form of discrimination (direct and indirect) on the ground of disability. Denial of reasonable accommodation is also considered as discrimination as per the Act. Following are some examples of discrimination against persons with disabilities which are against Company's policies:

- i. **Direct Discrimination:** Direct discrimination is where a person is treated less favourably because of their disability than someone without a disability. For example, a qualified person is rejected only because of their disability even though they have the required skills and competence to do the job.
- ii. **Indirect Discrimination:** Indirect discrimination is where there is a rule, policy or practice which seems to apply equally to everyone, but which puts a person with disability at a disadvantage compared to those who do not have a disability. For example, a person with visual impairment is not able to get through the selection process as they could not access the online assessment which was a compulsory part of the process.
- iii. **Denial of Reasonable Accommodation:** Reasonable accommodation means necessary and appropriate modification and adjustments to ensure that persons with disabilities have a level playing field. For example, an employee who had a brain injury due to an accident was not provided the necessary job restructuring/coaching to ensure that the person is able to return to work.

4.2 Accessibility and Reasonable Accommodation (Facilities and amenities):

HCCI is committed to ensuring an accessible work environment for persons with disabilities. Accessibility broadly means usability of built and digital environment, transportation, information, communication, products, and services by persons with disabilities on an equal basis with others.

4.2.1 Built Environment

HCCI will ensure that all its buildings (office spaces, factories etc.) comply with the 'Harmonised Guidelines and Space Standards for Barrier Free Built Environment for Persons with Disabilities and Elderly Persons', developed by Ministry of Urban Development (Government of India) in March 2016, as mandated by The RPWD Rules.

HCCI would endeavour to create and maintain reasonable accommodation from time to time to cater to the need for persons with Disability and Elderly persons in compliance to the RPWD Rules. Any person with disability facing accessibility challenges should report to the Workplace /Facilities team at their location with a copy to the Liaison Officer Giridhar Peela at <giridhar.appala.peela@hexagon.com>. These issues will be addressed on a priority basis.

4.2.2 Digital Environment

HCCI is taking measures to ensure that all its websites/portals/apps, documents, communication, e-learning, videos, and other information technology systems adhere to the accessibility standards. HCCI will ensure that only accessible technologies are developed/procured, and they will be tested for accessibility before their deployment.

The standards for digital accessibility are:

- i. Standards for websites and mobile applications: WCAG 2.1 AA
- ii. Standards for Documents (placed on websites): Electronic Publication (ePUB) or accessible PDF.

Any individual facing accessibility challenges can reach out to the local IT support team with a copy to the Liaison Officer Giridhar Peela at <giridhar.appala.peela@hexagon.com>

4.2.3 Reasonable Accommodation

HCCI provides reasonable accommodation to job applicants and employees with disabilities upon their request.

The objectives of reasonable accommodation to a person with disability are:

- i. to ensure level playing field in the application and selection process
- ii. to enable an employee with disability to perform the essential functions of a job, and
- iii. to enable an employee with a disability to enjoy the same benefits and privileges of employment as others.

Examples of reasonable accommodations may include (but not limited to) providing appropriate physical infrastructure, acquiring, or modifying equipment or devices, modifying assessment, and training materials, modifying work schedules, reassignment to a vacant position, providing a sign language interpreter, information in accessible formats, job restructuring, providing a job coach.

Refer to the Reasonable Accommodation Guidelines for more information regarding eligibility and the process for requesting accommodation. The Guidelines also detail the process to be followed by the Liaison Officer to approve/reject the request.

All documents concerning a job applicant/ employee's reasonable accommodation request will be kept confidential and the access to the information will be given only to the Liaison Officer and the concerned people involved in providing the needed accommodations.

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4.2.4 Transportation

HCCI as per its Cab service policy provides Transport Drop Facility to the employees working beyond the designated work hours to meet project schedules. Employees with disability could request for an accessible taxi service or any other support which would be reviewed on a case -to-case basis as per the Reasonable Accommodation Guidelines.

Taxi service providers, drivers, guards, and transport team at HCCI will be sensitised periodically on disability etiquette. any queries related to transportation policy please write to Giridhar Peela at <giridhar.appala.peela@hexagon.com>

4.3 List of posts identified suitable for persons with disabilities in the establishment

HCCI being an inclusive and equal opportunity employer, would not like to restrict persons with disabilities by identifying only a few roles for them. We encourage skilled persons with disabilities to apply for any vacant job in the company. The decision to hire will be based on the person's skill and knowledge needed for performing the essential functions of the job with or without reasonable accommodation.

4.4 Manner of Selection (Recruitment)

It is the policy of HCCI to ensure vacant positions are filled by recruiting qualified talent based on ability, experience, character, attitude, and aptitude as per the selection process defined.

4.4.1 Talent Sourcing

For all job positions, HCCI shall recruit candidates from either the industry or the leading college/universities based on the specified needs. For reaching the prospective candidates from the industry, the Human Resources Department may use one or more of the following:

- i. Unsolicited applications
- ii. Employee Referrals
- iii. Walk-in interviews
- iv. Agencies for executive search (preferably for senior positions only)
- v. Job Portals
- vi. HCCI Website
- vii. Internal Database

To increase the representation of disability diversity in its workforce, HCCI will endeavour in its employer branding and its job advertisements to highlight its efforts as a disability inclusive employer to source candidates with disabilities from its regular channels listed above and leverage agencies, job fairs and other events related to job seekers with disabilities.

4.4.2 Selection Process

Selection of candidates from industry shall always follow a process where both the Human Resources Department and the Technical Departments are involved.

This will in general, involve the following stages.

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- i. HR Representative will communicate with the candidate to give an overview of the company and the vacant position. An initial screening to understand if candidate is a good fit (In terms of communication/relevance of experience/intent of joining etc.) to the position for which talent is sought.
- ii. Written-test for junior level talent is conducted in programming languages and aptitude for all software life-cycle function.
- iii. The first round of technical interview is ideally done by Project Lead/Manager and the second by the Department Head.
- iv. Final interview and selection along with salary fixation is done by the HR Head.

Wherever required candidates with disabilities/medical conditions may request the recruiter for any required reasonable accommodations, like an accessible venue, scribe to write the exam, sign language interpreter, other reasonable adjustments/exemptions etc to participate in the selection process, both in the regular freshers and lateral recruitment. The recruiter will follow the process as per the Reasonable Accommodation Guidelines.

4.5 Training, Transfers/posting and Career Advancement

HCCI will ensure that employees with disabilities are able to effectively participate in induction and training on an equal basis with others by ensuring accessible arrangements and providing any reasonable accommodation. All Training invites will be in appropriate format and a statement of reasonable accommodation shall be part of it.

Employees with disabilities / medical conditions basis their accessibility requirements will be given preference or exemption in transfer/posting, based on availability of suitable positions in the location, as a reasonable accommodation.

HCCI will ensure that employees with disabilities are provided equal opportunity in career development, and as per their request will be provided reasonable accommodations to effectively participate in the appraisal process. It will be ensured that there is no discrimination based on disability in progression/promotion/transfers and training opportunities. HCCI will proactively work towards removing barriers to progression by developing specific programs for training and mentoring people with disabilities, sensitising managers, monitoring the progression/succession pipeline, and creating an inclusive work culture where everyone has level playing field to progress.

4.6 Maintenance of Records

As per the requirement of the law, HCCI will collect and maintain data on employees with disabilities in relation to their employment, facilities provided and other necessary information. All employees will be asked to fill the 'Voluntary Disability Self Identification Form', while each employee would voluntarily choose to share about any disability that they may have. An employee will be able to also edit the information at any time during their tenure. No employee will be penalised for non-disclosure of their disability information or disclosing it later. An employee who acquires disability during their tenure with HCCI can also edit and update the form.

Refer to Section of 'Definitions' of this Policy for the definition of persons with disabilities. Those employees with disabilities who have Disability Certificate (issued by a certifying authority as per the Act) stating their disability as 40% or more are referred as persons with benchmark disabilities. The Government provides certain benefits for persons with benchmark disabilities like tax exemption. Employees should submit the Disability Certificate along with the Self Identification Form for getting the tax benefits.

If an employee has an impairment but they do not have a Disability Certificate (in such case, the medical papers could be verified), they can still seek reasonable accommodation in employment by filling the Voluntary Disability

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Self Identification Form. For any clarification or for assistance in filling the form, contact the Liaison Officer Giridhar Peela at <giridhar.appala.peela@hexagon.com>

The information that an employee shares about their disability will be kept confidential. Access to the information would be given to Liaison Officer and HR Head. It may be shared as an aggregated report for further organization wide initiatives, without giving any personal identifiable information.

Exceptions to the confidentiality clause:

- i. Managers may be given information on a need-to-know basis about an employee's disability for providing any reasonable accommodations.
- ii. Security personnel may be given information about an employee's disability to facilitate obtaining any necessary support during an emergency.
- iii. Government officials who may be given information about the employee with disability whose case is being investigated under the RPWD Act 2016 or under any other law as appropriate.

4.7 Additional Leave considerations

Employees with disabilities and those who acquire disability during the course of employment with HCCI may seek leave for medical treatment and/or for rehabilitation over and above the leave entitlement. An employee's request for extra leave, for the purpose related to their treatment/rehabilitation, will be treated as a request for reasonable accommodation and will be evaluated accordingly.

4.8 Employee Engagement

HCCI will endeavour to ensure that all company events and meetings are inclusive for employees with disabilities by ensuring that they are conducted at accessible venues with the provision for reasonable accommodation, such as preferred seating, sign language interpretation, information/documents in accessible formats, etc. as per employee's needs and preferences. HCCI will endeavour to make all communications regarding the events/meetings will be in accessible formats and would have a statement regarding the availability of reasonable accommodations on request.

4.9 Disability inclusion Awareness

HCCI will conduct periodic awareness programmes for its employees on disability rights, etiquettes, and inclusive behaviour to ensure a non-discriminatory and inclusive work culture.

4.10 Emergency Preparedness

Safety and security of work environment is a very high priority for HCCI. Mock rehearsals are conducted annually to check the effectiveness of the emergency preparedness and response plan.

HCCI understands that there may be individuals with disabilities who may need specific infrastructural support and assistance during emergency and the emergency plan considers their need, like providing evacuation chairs, visual strobes, handrails, training of the emergency response team etc. A Personal Emergency Evacuation Plan (PEEP) would be developed for associates who need assistance during an emergency. When an employee fills in the Disability Self Identification stating that they have a disability and needs assistance during evacuation then they need to fill the Personal Emergency Evacuation Plan (PEEP) form which is accessible by Liaison Officer, buddy,

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and the Facilities head. The Facility Team will provide the needed support to employee with disability. The support could range from providing an evacuation chair in the closest exit to assigning buddy/ies, to adding visual strobes at the workstation, etc. Training will also be provided to associate with disability to educate them about the various facilities, like the use of manual call point, exit door, route to refuge area, or safe assembly area etc. Training would also be provided to the Emergency Response Team for providing the needed assistance for employees with disabilities.

5. Governance Framework

Diversity, Equity, and Inclusion is a top driven initiative at HCCI with the (Diversity and Acceptance Council headed by Suresh Kadambari responsible for D&A) taking the responsibility for ensuring a diverse and inclusive workplace.

5.1 Diversity Council and Disability Working Group

At HCCI the principle of diversity is firmly anchored in the Hexagon strategy. It has constituted a Diversity Council comprising of senior members who plan and monitor the diversity agenda, including disability inclusion.

There is also a Disability Working Group that executes the various initiatives and programs.

The members of the Working Group are Senior level representatives from Facilities, Technology, Recruitment, Business HR, Training and leaders from each Business line (vertical). It also includes employees with disabilities.

The Working Group will be responsible for developing plans and programmes for implementing the Policy and for ensuring that the mandates of the RPWD Act are fulfilled in letter and spirit. The meetings of the Working Group will be held at least once every quarter.

5.2 Liaison Officer

As per the requirement of The RPWD Act Rules, Liaison Officer has been appointed to coordinate and implement disability related plans/programmes within HCCI and ensure the compliance with the Act. HCCI shall also engage an external subject matter expert on need basis in area of disability inclusion as a consultant to support the Liaison Officer in carrying out the responsibilities.

The Liaison Officer will be responsible for:

Liaising with the relevant stakeholders within the Company to facilitate the development of an Action Plan to ensure implementation of the commitments made under the policy.

- i. Ensuring reasonable accommodation requests from job applicants and employees are addressed on a timely basis.
- ii. Developing proactive strategies for employing and retaining persons with disabilities in the company
- iii. Developing/conducting awareness programmes to promote disability inclusion in the workplace.
- iv. Ensuring that all employees are aware of the Equal Opportunity Policy and know their duties and responsibilities.
- v. Preparing reports for senior leadership, Diversity Council and Working Groups regarding the progress made on a quarterly basis.

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- vi. Preparing documents/reports/presentations in the area of disability inclusion.
- vii. Networking and participating in disability forums to share and learn about best practices in the industry.
- viii. Keeping the stakeholders updated with the developments, in the area of disability policies, technology etc.

6. Grievance Redressal Mechanism

HCCI is committed to responding and resolving any complaint of discrimination or denial of reasonable accommodation or harassment/bullying on the grounds of disability. All employees have the responsibility to comply with the provisions given in the Equal Employment 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 everyone. 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.

6.1 First Level Grievance

The aggrieved person must report the matter to the Liaison Officer by writing an email to Giridhar Peela at <giridhar.appala.peela@hexagon.com>. The Liaison Officer is responsible to initiate action and investigate the issue and respond to the aggrieved person regarding the action taken. The Liaison Officer should investigate the matter within 2 weeks of the registration of the complaint.

The Liaison Officer will maintain records of complaints of persons with disabilities with the following details.

- i. date of complaint
- ii. name of complainant
- iii. name of the person who is enquiring the complaint
- iv. place of incident
- v. the name of the person against whom the complaint is made
- vi. gist of the complaint
- vii. documentary evidence if any
- viii. date of disposal by the Liaison Officer
- ix. any other information.

6.2 Second Level Grievance

HCCI has constituted a Grievance Redressal Committee which will act on behalf of the Head of establishment for investigating the complaint received from the aggrieved person regarding any act of discrimination on the grounds of disability. The aggrieved person can escalate the matter to the Committee if not satisfied with the resolution provided by the Liaison Officer.

The Grievance Redressal Committee will comprise of:

- i. Shilpa KANKARIA (Chairperson)
- ii. Satyasridevi SEEMAKURTHI (Committee Member)
- iii. Aditya SHRIVASTAVA (Committee Member)
- iv. Giridhar A PEELA (Liaison Officer)

The Committee will be responsible for:

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- i. Initiating action in accordance with the provisions of the Act; or
- ii. Informing the aggrieved person in writing regarding the decision.

The maximum tenure of the members of the Committee will be 3 years. The Grievance Redressal Committee will act in strict confidentiality and impartiality. Employees will be protected from coercion, intimidation, interference, discrimination, or retaliation for filing a complaint or assisting in an investigation under the Act.

7. Revision of the Policy

The Policy will be reviewed and updated annually by the Diversity Council along with the Liaison officer and the PwD workgroup of the D&A council.

8. Policy Administration & Exceptions

Human Resources Department, in consultation with Diversity and Acceptance Council and Liaison Officer will be the policy arbitrator and to be reached out for any policy exception.

9. 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