

Diversity, Inclusion & Equal Opportunity Policy

Contents

I. Distribution List3

II. Version History3

III. Overview4

IV. Applicability4

V Policy Statement4

VI. Definitions.....4

VII. Inclusion, Diversity and Equality in Capgemini.....4

VIII. Equal Opportunity.....14

IX. Violation Redressal Mechanism.....15

X Non- Retaliation15

XI. Management Rights.....16

Policy Name	Diversity, Inclusion & Equal Opportunity Policy
Version No	5
Owner	Lead – Diversity & Inclusion
Last Review Date	December 2020

Nov 2019	Prepared By	Diversity & Inclusion Team	
Sep 2020	Reviewed By	India HR Team (Gayathri Ramamurthy)	India Legal Team (Archana Gupta)
Dec-2020	Approved By	CHRO India & Regional General Counsel (Pallavi Tyagi & Bharat Mehta)	

I. Distribution List

Issued to all employees and Contractors of Capgemini Technologies Services India Limited (hereinafter “Capgemini”)

II. Version History

Version	Date	Description
1.0	01-07-2008	Released document to all full time and contract employees of Capgemini
2.0	04-01-2013	Changes made in the Disability and reasonable adjustment and Violation Redressal sections
3.0	19-11-2014	Policy document revamped with definitions of diversity and inclusion added
4.0	17-08-2018	Placement of new logo change of Company name, addition of important definitions and equal opportunity form.
5.0	15-Dec-2020	Revision of policy, renaming of policy by introducing Equal Opportunity.

III. Overview

Capgemini sets a high value on the contribution of its people and recognizes that they should be valued as individuals. It recognizes that everyone has a different background and that each one of them can bring fresh ideas and perceptions, thereby, making the workplace more sensitive and efficient. Encouraging diversity enables Capgemini to reflect on today's multi-cultural society and the changing social and economic patterns in the workplace.

IV. Applicability

This policy applies to all Employees/ Contractors of Capgemini and is irrespective of the stage of the employment cycle which includes stages like recruitment, selection and/or training.

For the purposes of this policy:

1. Employees refers to any person who is on the payrolls of Capgemini
2. Contractor refers to personnel working on contract (part time/full time) and/or as employees of Capgemini's contractor/vendor/service provider who is deputed to any Capgemini premises across India

V Policy Statement

It is Capgemini's policy and practice to encourage diversity in its workplace. Capgemini supports this by providing and promoting equal opportunities and treatment to all employees/Contractors and to the candidates being considered for hire by Capgemini.

If an employee acquires a disability during her/his employment tenure she/he can return to work at the same grade as before. In case the Employee is unable to perform the current job, the organization will invest in re-skilling the Employee for another position at the same grade.

Capgemini is unreservedly opposed to any form of discrimination / harassment on the grounds of caste, religion, race, color, creed, ethnic or national origins,

gender, marital status, sexual orientation, disability, financial status, class, pregnancy or maternity or age, which are the characteristics of diversity.

Capgemini is committed to promote awareness on equal opportunity and inclusion for all characteristics of diversity among all Employees by organizing training and sensitization programs and campaigns.

VI Definition

1. Diversity and Equality

- 1.1 Equality can be described as breaking down barriers, eliminating discrimination and ensuring equal opportunity and access for all at Capgemini.
- 1.2 Diversity can be described as celebrating differences and valuing everyone. Each person is an individual with visible and non-visible differences and by respecting this everyone can feel valued for their contributions which is beneficial not only for the individual but for Capgemini also.
- 1.3 Equality and Diversity are not inter-changeable but inter-dependent. There can be no equality of opportunity if difference is not valued and harnessed and taken account of.
- 1.4 An Inclusive workplace is where all individuals are treated fairly and respectfully, have equal access to opportunities and resources and can contribute to organization's culture and success.

2. 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;

3. Reasonable accommodation

Means necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden so that person with disabilities can enjoy or exercise rights equally with others.

4. 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.

VII Inclusion, Diversity and Equality in Capgemini

This policy sets out clear standards to be followed by all Employees and Contractors of Capgemini to be aligned with this policy

The policy covers the following elements: -

- Working environment
- Discrimination
- Harassment, Bullying
- Disability and Reasonable Adjustment

Not only does diversity help Capgemini to become a preferred employer it also enables Capgemini to:

- Have a diverse, high-achieving workforce which is a sustainable competitive advantage. Diverse workforce is essential to be successful in the workplace and the communities around the world;
- Have inclusive, flexible work environment that values differences and motivates Employees and Contractors to contribute to their best;
- Have a competitive edge and be an efficient player in attracting, developing, promoting and retaining a diverse workforce;
- Have trust, mutual respect and dignity which are fundamental beliefs and are reflected in our behavior and action(s);

1. Working Environment:

Capgemini is committed to ensuring that all employees and Contractors enjoy a working environment where they are encouraged to achieve their full potential.

This can be achieved through the following steps:

- Gathering and inviting feedback on initiatives, from employees and Contractors, to understand and respond to the full range of diversity and equality issues;
- Ensuring compliance with relevant and applicable legislations;
- Continuously reviewing and improving all HR practices and procedures, e.g. recruitment, selection, training & development, promotion, grievance-handling, disciplinary procedures, harassment, and dismissal etc., to ensure that equality is a key factor;
- Benchmarking Capgemini's position against industry standards and best practices and taking steps to endeavor that it adheres to such best practice guidelines;
- Spreading awareness about the spirit and practical implications of this Policy amongst everyone in Capgemini and those who are involved with it, including Capgemini's vendors, clients, partners etc.
- Working with external organizations who specialize in diversity issues and try to be in line with industry standards.

1. Discrimination

- Capgemini will not tolerate any form of discrimination in the workplace. If it is alleged that discrimination has occurred, then the complaint will be investigated thoroughly, and appropriate action will be taken based on the investigation's outcome.
- If an Employee or Contractor is found to have committed any act of discrimination, then such Employee or Contractor will be subject to disciplinary action under the relevant policies of Capgemini. Such behavior constitute(s) act of gross misconduct and Capgemini takes a strict approach to any such violation and/or acts of misconduct.

Discrimination can either be direct or indirect.

Direct discrimination occurs when someone is discriminated due to reasons such as gender, sexual orientation, age, disability, religion etc.

Indirect discrimination occurs when a condition or rule is applied to all employees and Contractors, but which disadvantages a large proportion of one group who have a certain characteristic, and there is no legitimate and proportionate reason for imposing such condition.

2. Harassment/ Bullying

i) Harassment

- Harassment in workplace can be described as behavior, which is unwanted, unwelcome and undermines a person's dignity at work. It is a behavior which an Employee, Contractor, a colleague, a client or a supplier finds intimidating, upsetting, embarrassing, humiliating or personally offensive.
- Harassment in workplace is not limited to only the physical workplace of Capgemini but includes any such act as detailed in the policy that was made in any digital platform and/or extended workplaces.
- Harassment (through any medium i.e. – in person and/or digital) may include (but is not limited to) making inappropriate comment, jokes, posting threats or demeaning comments on social media.
- Harassment in any form will not be tolerated within Capgemini.
- It is immaterial whether the act of harassment was committed intentionally or not. It is the effect that such harassment has on any Employee, Contractor, client or supplier that makes it unacceptable.
- The impact of harassment and bullying on the individual who is being harassed can be significant and detrimental to their behavior, morale, performance and health- both mental and physical. Therefore, any allegation of harassment will be fully investigated.
- Acts which causes any form of trauma i.e., physical, mental or emotional trauma is unacceptable not only in the workplace, but also in extended workplace which includes all office locations of Capgemini across India, transport facility organized and monitored by Capgemini, Guest houses, and/or any events organized by Capgemini.

ii) Bullying

Bullying is like harassment; however, it usually involves the misuse of power or intimidation leaving the bullied individual feeling hurt, vulnerable, angry and helpless. Examples of potentially bullying behavior through any medium i.e. – in person and/or digital may include:

- Public humiliation, put-downs or ridiculing;

- Personal insults and name calling;
- Instantaneous rages;
- Persistent criticism;
- Aggressive behavior or threats directed at an Employee or Contractor;
- Manner of addressing an Employee or Contractor;
- Physical attacks;

Bullying/ Harassment should not be confused with legitimate actions by a manager/ supervisor to encourage an improvement in an Employee's performance such as:

- Negative feedback from a manager/supervisor or a client which is intended as constructive comment;
- Defining areas for personal improvement(s) by manager/supervisor or a client;
- Reasonable instructions given by manager/supervisor or a client;
- Performance management and setting of work-related targets and objectives
- Appropriate action taken under the Disciplinary Policy or a Performance Improvement Plan (PIP).

3. Disability and Reasonable Adjustments

The disability categories for the purpose of this Policy are detailed in the Annexure-I

4.1 Facilities and amenities:

4.1.1. Physical Infrastructure

Capgemini ensures that our physical infrastructure (buildings, furniture, facilities and services in the building/campus) adheres to the accessibility Standards given in The Harmonized Guidelines and Space Standards for Barrier Free Built Environment for Persons with Disabilities and Elderly Persons, 2016 and the National Building Code, 2016. Any employee facing accessibility issues should report to the facilities team at their location or write to the [Liaison Officer](#).

4.1.2 Digital Infrastructure

Capgemini website is designed as per The Standards for Information and Communication Technology as given in the RPWD Rules 2017 which are-

- (i) Website Standards: Guidelines for Indian Government Websites (GIGW), as adopted by Department of Administrative Reforms and Public Grievances, Government of India.
- (ii) Documents Standards: Electronic Publication (ePUB) or Optical Character Reader (OCR) based pdf formats.

Any employee facing accessibility challenges can reach out to the local IT support team or write to Liaison Officer or can declare their requirements through Disability Self Identification Form

4.2 Reasonable Accommodation

In compliance to the RPWD Act whenever necessary, for qualified employees or job applicants who have disabilities, Capgemini makes reasonable accommodations to:

- (i) ensure equal opportunity in the application and selection process.
- (ii) enable an employee with a disability to perform the essential functions of a job, and

4.3 Training and Career development:

Capgemini endeavors to provide course materials meant for induction and training in accessible formats on request. The request for reasonable accommodation, such as assistive aids, accessible training venue, accessible materials, interpreter, scribe, etc. can be placed, while registering for the training program through monthly training calendar communications, by dropping e-mail to

inclusion.in@capgemini.com

Capgemini has an accessible and inclusive appraisal process. Any employee/Manager requiring any reasonable accommodations for an appraisal process must place a request with the Liaison Officer or by writing to inclusion.in@capgemini.com at least two days in advance.

4.4. Leave and workplace flexibility

- Employee's request for additional leave, for any reason of disability or medical treatment, will be treated as a request for reasonable accommodation and will be evaluated accordingly. Capgemini provides an option of sabbatical leave for a maximum period of twenty-four months which can be availed to undergo medical treatment or in case of emergency. The procedure for availing the leave is detailed out in the Capgemini's Leave Policy.
- To ensure Employees are protected during the break the following insurance benefits will continue:
 - **Medical Insurance** coverage for self, spouse and children
 - **Term Life Insurance** coverage for self
 - **Personal Accident Insurance** for self
- Workplace flexibility policy provides work from home and part time options which can be available post appropriate approvals. The procedure for availing flexibility is detailed out in [Policy on Flexi Work Options](#)

4.5 Travel, stay and transport

For official travel (local, outstation and international), Employee needs to adhere to Travel Policy. Below reasonable support is provided under the policy for persons with disabilities, should they need to travel for any Company purpose;

- In case of locations mandated to be travelled by train, an Employee with disability having difficulty in traveling by train can be considered for other mode of travel depending on the destination.
- In case hotel room is not available which is accessible, within the amount designated for a given position, then, as a reasonable adjustment, the amount can be increased to the next level.
- Reasonable adjustment required due to disability will be initiated and informed to Capgemini Guesthouses and Hotels e.g. accessible room, housekeeping assistance or any specific request based on individual needs
- If a person with disability requires an escort or assistance while traveling, the same could be provided as reasonable adjustment
- In case the attendee / participant of the meeting / event has a disability, care should be taken to ensure that accessibility concerns are taken into account and provided for so that the person can participate on an equal basis with others.
- Every meeting / event announcement should include the following line, which would help in preparing for the event / meeting. "In case a person with disability is attending the meeting / event and needs any reasonable adjustment, such as accessible venue, sign language interpreter, information in accessible format, wheelchair or any other assistance, write to individual HOD or India Travel Manager with adequate notice time.
- Special assistance required due to disability can be added in Travel application remarks column. Travel desk will inform concerned airline / hotel / guesthouse accordingly.

4.6 Employee Engagement.

Capgemini will endeavor to make all company events and meetings inclusive

by ensuring that these are conducted at accessible venues with a provision of reasonable accommodation being available to employees with disabilities

4.7 Employee Assistance

To assist employees with disabilities in better manner and to address individual issues based on their disability Capgemini has formulated Disability Self Identification Form (DSIF) and reasonable accommodation guidelines as detailed above in this Policy. The employees will voluntarily declare their need for reasonable accommodation based on their declared disability.

All documents concerning an employee's reasonable accommodations request would be maintained in the disability self-identification form or HRMS Portal.

To fill the DSIF follow the path below

Go to MyConnect >> Access your Personal Data (ESS) >> Personal Information >> Personal Profile>> View/update disability details

Note: The information as declared by the employee on the DSIF shall be kept confidential and maintained as per the Company's Data Privacy Policy.

Exceptions to the confidentiality clause:

- 1) Managers, Building SPOCS and Facility Team SPOCS may be given information about an employee's disability for allowing/providing any accommodations.
- 2) Security personnel may be given information about an Employee's disability so as to facilitate obtaining any necessary support during an emergency.
- 3) Adequate records will be maintained of the information the Employee share and it may be produced to government officials who are inspecting the compliance under the RPWD Act.

4.8 Liaison Officer

Capgemini has a Liaison Officer who will be responsible for taking initiative and providing the requisite support needed to realize the goals of an inclusive and accessible workplace and reasonable accommodation. The details of the Liaison officer are available [here](#).

VIII Equal Opportunity

At Capgemini, our decisions on employment, career progression, training or any other benefits are solely based on merit. We follow an inclusive evaluation process during recruitment to ensure each applicant/ candidate can be evaluated fairly and without any bias across all characteristics of diversity which includes but is not limited to for person with disabilities, gender.

In addition, our selection criteria is non-discriminatory. All vacancies of posts in Capgemini will be advertised/notified internally, externally, colleges, polytechnics and disability organizations. Under the recruitment process, application forms will be made available in the formats requested. The selection criteria for all candidates is standard and as per the requirement of the role.

Reasonable Adjustments for person with disability in selection process:

- As deemed fit and necessary and on case to case basis, the minimum qualifying scores at 10th, 12th and Graduation may be relaxed for people. Generally, all the candidates at entry level positions are required to take an aptitude test, however, Persons with disability who need exemptions or substitutions or reasonable accommodations for taking the test should contact the Liaison Officer or can send request on

inclusion.in@capgemini.com

- To ensure fair and transparent evaluation and selection, each interviewer is mandated to record her/his comments on the candidate's capability in the Interview Evaluation Form. Reasons for rejection must be objective and not related to the person's disability.
- Gap in employment shall be considered on case to case basis.
- Wherever possible, more than one person must be involved in the selection interview and recruitment process. It is our endeavor that all interviewers have received appropriate training and guidance on the topic of equal opportunities for people with disabilities and/or other candidates

IX Violation Redressal Mechanism

All Employees have the responsibility to comply with this 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 others.

Employees are encouraged to report incidents of violation within the scope of the policy @ [SpeakUp portal](#).

X Non- Retaliation

We understand that Employees or Contractors may feel worried about voicing their concern(s). Capgemini believes in not retaliating in any way, against any employee or Contractor who makes a report of harassment or discrimination. Further, if Capgemini finds that the person against whom a complaint has been raised has engaged (directly or has induced someone else to engage) in any act of retaliatory conduct then such person shall be subjected to disciplinary action.

XI. Management Rights

Capgemini reserves the right to amend this policy from time to time, without prior notice.

ANNEXURE-1

Definition of 21 Disabilities as per RPWD Act, 2016

Physical disability—

A. Locomotor disability (a person's inability to execute distinctive activities associated with movement of self and objects resulting from affliction of musculoskeletal or nervous system or both), including—

(a) "leprosy cured person" means a person who has been cured of leprosy but is suffering from—

(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 having 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 him/her from undertaking any gainful occupation, and the expression "leprosy cured" shall construed accordingly;

(b) "cerebral palsy" means 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 centimeters) 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 has incorrect and missing information in their genes, which prevents them from making the proteins they need for healthy muscles. It is characterized by progressive skeletal muscle weakness, defects in muscle proteins, and the death of muscle cells and tissue;

(e) "acid attack victims" means a person disfigured due to violent assaults by throwing of acid or similar corrosive substance.

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; or
- (ii) visual acuity less than 3/60 or less than 10/200 (Snellen) in the better eye with best possible correction; or
- (iii) limitation of the field of vision subtending an angle of less than 10 degrees.

(b) "low-vision" means a condition where a person has any of the following conditions, namely—

- (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; or
- (ii) limitation of the field of vision subtending an angle of less than 40 degrees up to 10 degrees.

C. Hearing impairment—

(a) "deaf" means persons having 70 DB hearing loss in speech frequencies in both ears;

(b) "hard of hearing" means person having 60 DB to 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 characterized by significant limitation both in intellectual functioning (reasoning, learning, problem solving) and in adaptive behavior which covers a range of every day, social and practical skills, including—

(a) "specific learning disabilities" means a heterogeneous group of conditions wherein there is a deficit in processing language, spoken or written, that may manifest itself as a difficulty to comprehend, speak, read, write, spell, or to do mathematical calculations and includes such conditions as perceptual disabilities, dyslexia, dysgraphia, dyscalculia, dyspraxia and developmental aphasia;

(b) "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 behaviors.

3. Mental behavior—

"mental illness" means a substantial disorder of thinking, mood, perception, orientation or memory that grossly impairs judgment, behavior, capacity to recognize 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 characterized by sub normality of intelligence.

4. Disability caused due to—

(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 is 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) "hemophilia" means an inheritable disease, usually affecting only male but transmitted by women to their male children, characterized 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 characterized by reduced or absent amounts of hemoglobin.

(iii) "sickle cell disease" means a hemolytic disorder characterized by chronic anemia, painful events, and various complications due to associated tissue and organ damage; "hemolytic" refers to the destruction of the cell membrane of red blood cells resulting in the release of hemoglobin.

5. Multiple Disabilities (more than one of the above specified disabilities) including deaf blindness which means a condition in which a person may have 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

Annexure-2

EQUAL OPPORTUNITY FORM

<p>Capgemini is an equal opportunity employer. As per the policy, employees with disabilities (including persons with orthopedic, visual hearing, speech, learning disabilities, psycho-social impairment, multiple disabilities or any other medical condition) can seek any reasonable adjustment that they may need due to their disability. Sharing information on disability is voluntary*. The information would be kept confidential and would be shared only with relevant people who may need to provide the adjustment that you may have requested for or to the Emergency Team, in case you need any support during emergency. This information would also enable Capgemini to pass on any benefits like Income/ Professional Tax exemptions etc. provided by the Indian Government to people with disabilities. Please submit the Disability Certificate for getting Government benefits.</p>	
Q.1	<p>Do you have any disability/medical condition? (Yes/No)</p>
Q.2	<p>What is the nature of your Impairment? <u>Please tick an appropriate option:</u></p> <ul style="list-style-type: none"> <input type="radio"/> Blindness <input type="radio"/> Low vision <input type="radio"/> Leprosy Cured persons <input type="radio"/> Deaf <input type="radio"/> Hard of hearing <input type="radio"/> Locomotor Disability <input type="radio"/> Dwarfism <input type="radio"/> Intellectual Disability including specific learning disabilities or autism spectrum disorder <input type="radio"/> Mental Illness <input type="radio"/> Autism Spectrum Disorder <input type="radio"/> Cerebral Palsy <input type="radio"/> Muscular Dystrophy <input type="radio"/> Disability due to chronic neurological conditions

	<ul style="list-style-type: none"> ○ Specific Learning Disabilities ○ Multiple Sclerosis ○ Speech and Language disability ○ Thalassemia ○ Hemophilia ○ Sickle Cell disease ○ Multiple Disabilities, i.e., more than one disability including deaf blindness ○ Acid Attack victim ○ Parkinson's disease 	
Q.3	If you have selected any other disability/ medical condition, please specify.	
Q.4	Do you need any workplace adjustments/assistance to enable you to perform your job? (Yes/ No)	
	<i>If yes, please specify</i>	
Q.5	Do you need any assistance in the event of an emergency evacuation (Yes/No)	
	<i>If yes, please specify</i>	
Q.6	Do you have a Disability Certificate issued by the Government? (Yes/No)	
<p>Date: Signature of employee</p> <p><i>* Please Note that any information provided by the employee will be processed according to the fair principles laid down in the Capgemini Data Privacy Policy.</i></p>		

