

Wave Industries Private Limited

Transgender Persons (Protection of Rights) act, 2109 Policy

Objective- The purpose of this policy is to affirm the Company's commitment to equality, dignity, and non-discrimination of transgender persons, in compliance with the Transgender Persons (Protection of Rights) Act, 2019 and the Rules framed thereunder. The Company seeks to create an inclusive, safe, and respectful workplace where transgender persons can work with dignity and equal opportunity

Scope and Applicability- This policy applies to:

- All employees of the Company including permanent, temporary, probationers, trainees, apprentices, contractual, fixed-term employees and consultants.
- All applicants, candidates, interns and visitors at Company workplaces.
- All Company locations including offices and plants.

Definitions-

- Transgender Person: A person whose gender does not match with the gender assigned to that person at birth and includes trans-man, trans-woman (whether or not such person has undergone Sex Reassignment Surgery), persons with intersex variations, genderqueer persons, and persons having socio-cultural identities such as kinnar, hijra, aravani, and jogta.
- Discrimination: Any distinction, exclusion or restriction that impairs or nullifies the recognition or exercise of rights on the basis of gender identity.
- Gender Identity: An individual's self-identified gender, which may or may not correspond with sex assigned at birth.

Policy Statement- The Company is committed to:

- Prohibiting discrimination against transgender persons in employment and occupation.
- Providing equal opportunity in recruitment, appointment, promotion, training, compensation and career advancement.
- Respecting self-identified gender identity, name and pronouns.
- Ensuring a safe and inclusive workplace free from harassment, abuse or exclusion.

Non-Discrimination in Employment- The Company shall not discriminate against any transgender person in matters relating to:

- Recruitment, selection and appointment
- Terms and conditions of employment
- Promotion, transfer, training and skill development
- Performance appraisal and compensation
- Termination of employment

Any act of discrimination shall be treated as misconduct and dealt with under the Company's disciplinary procedures

Recruitment and Onboarding

- Job advertisements and recruitment processes shall be inclusive and gender-neutral.
- Selection shall be based solely on merit, skills and job requirements.
- Onboarding documents shall allow employees to indicate their self-identified gender.
- HR records shall be updated in accordance with the employee's self-identified gender, subject to applicable legal documentation.

Facilities and Workplace Inclusion

- Provide access to washrooms and facilities in accordance with an employee's self-identified gender.
- Ensure safe access to common areas, canteens, transport and changing rooms.
- Make reasonable adjustments to workplace practices to support inclusion and dignity

Harassment and Prohibition of Abuse- In line with the Act, the following acts are strictly prohibited:

- Denial of access to workplace facilities
- Physical, sexual, verbal, emotional, or economic abuse
- Insulting, humiliating, or intimidating behavior
- Any form of harassment on the ground of gender identity

Such acts shall attract disciplinary action as per Company rules, in addition to legal consequences where applicable.

Confidentiality and Privacy

- Information relating to an employee's gender identity or transition status shall be treated as confidential.

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- Disclosure shall be made only with the employee's consent or as required by law.
- Breach of confidentiality shall be treated as misconduct.

Grievance Redressal Mechanism

- Any transgender person who feels discriminated against or harassed may raise a complaint with HR or the designated Grievance Redressal Officer.
- Complaints shall be handled promptly, sensitively and confidentially.
- No retaliation shall be permitted against any person who raises a complaint in good faith.

Awareness and Sensitization- The Company shall conduct periodic awareness and sensitization Programmes for employees, supervisors and managers to:

- Promote understanding of gender diversity
- Prevent bias and stereotypes
- Ensure compliance with legal obligations under the Act

Roles and Responsibilities

Management

- Demonstrate leadership commitment towards inclusion and equality.
- Ensure adequate resources for implementation of this policy.

Human Resources

- Implement, monitor, and review this policy.
- Ensure compliance with the Transgender Persons (Protection of Rights) Act, 2019.
- Maintain appropriate records and confidentiality.

Employees

- Treat all colleagues with dignity and respect.
- Refrain from discriminatory or harassing behavior.

Statutory Compliance and Penalties- The Company shall ensure strict compliance with the provisions of the Transgender Persons (Protection of Rights) Act, 2019 and the Transgender Persons (Protection of Rights) Rules, 2020, as amended from time to time.

Compliance with Other Laws and Policies- This policy shall be read in conjunction with:

- The Transgender Persons (Protection of Rights) Act, 2019 and Rules thereunder
- The Company's Code of Conduct and Disciplinary Policy
- Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, where applicable
- Any other applicable labour and employment laws

In case of any inconsistency between this policy and statutory provisions, the provisions of the applicable law shall prevail

Review and Amendment- This policy shall be reviewed periodically and amended as required to remain aligned with statutory requirements and best practices.