

Date of Start	Equal Opportunity Policy for Transgender Persons	Code	Policy-HRAdmn-HR-13
01 st May 2025		Responsible	Head HR & Admin
		Department in charge	HR & Admin

Article 1 Objective:

- To provide equal opportunity, a safe working environment and to ensure that no transgender person is discriminated against in any manner, including in relation to employment, recruitment, employment benefits, promotion and other related aspects.
- The decisions on employment, career progression, training or any other benefits are solely based on neutral hiring process. Any information shared by employee on their gender and/or sexual orientation would remain confidential, except in case of legal requirements.

Article 2 Scope:

- This policy shall apply to all employees including trainees of TDSG, any other individuals engaged in the workplace, and applies to all aspects of employment, including recruitment, training, working conditions, salaries, promotion, benefits, and separation.

Article 3 Definitions:

3.1 Transgender Person:

As defined in the Transgender Persons (Protection of Rights) Act, 2019, a “transgender person” means a person whose gender does not match the gender assigned to that person at birth and includes trans-man or trans-woman (whether or not such person has undergone sex reassignment surgery or hormone therapy or laser therapy or such other therapy), a person with intersex variations, genderqueer and person having such socio-cultural identities.

3.2 Discrimination:

Discrimination in relation to gender identity/ sexual orientation status means any distinction, exclusion, or restriction based on gender identity/sexual orientation, which is the purpose or effect of impairing or nullifying the recognition, enjoyment or exercise on an equal basis with others of all humans 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 or any other discrimination defined under sec. 3 of the Transgender Persons (Protection of Rights) Act 2019 in relation transgender persons respectively.

Article 4 Equal Opportunity Commitment:

- Recruitment and Hiring:** In TDSG Recruitment and hiring practices shall be inclusive and welcoming to transgender applicants. TDSG ensures that all individuals of any gender have equal opportunities during the recruitment and hiring process. That no bias shall be extended to any of the applicants based on their gender identity/sexual orientation status.

- b. **Training and Development:** TDSG provides training, development, and advancement opportunities for all employees of any gender. Regular awareness and sensitivity training shall be conducted for employees and management on transgender issues and rights. Training programs shall include aspects of inclusivity, respectful communication, and the legal rights of transgender persons.
- c. **Equal Pay and Benefits:** All employees are provided with fair and equitable compensation including benefits and privileges. TDSG provides equal opportunities in hiring, promotion, transfers, compensation, benefits, leaves of absence, and decisions about discipline and termination of employment.
- d. **Facilities & Infrastructure:** TDSG is committed to making the workplace and facilities accessible to all employees and visitors. TDSG ensures that the infrastructure at its facilities is designed to accommodate different needs, including those of visitors who visit the Company facilities. Unisex or gender-neutral washroom facilities shall be made available wherever feasible. Dress code policies shall accommodate employees' gender identities.
- e. **Sensitization and awareness:** TDSG ensure to conducts periodic awareness programs for making employees aware of the rights and needs of transgender persons.
- f. **Non-Discrimination:** TDSG ensures that no employee or applicant shall be discriminated against on the grounds of gender identity or expression. All employment-related decisions will be based on merit, qualifications, and business requirements.
- g. **Right to Self-Perceived Gender Identity:**
Individuals shall be recognized by their self-identified gender. Employees have the right to identify and express their gender identity. TDSG shall recognize and respect their self-identified gender. All official records (ID cards, HR records, etc.) shall be updated upon the employee's request in alignment with their self-declared gender identity.
- h. **Right to Equality and Non-Discrimination:**
No discrimination shall be practiced in matters of recruitment, training, promotion, transfer, or termination based on a person's transgender status. Equal access to all company facilities, programs, and opportunities shall be ensured. That no bias shall be extended to any of the applicants based on their gender identity/sexual orientation status.
- i. **Right to a Safe Workplace:**
TDSG strictly prohibits harassment, bullying, or any form of abuse or humiliation based on gender identity or expression. Grievance redressal mechanisms shall be sensitive and inclusive toward transgender employees.
- j. **Grievance Redressal Mechanism:** TDSG has appointed a Complaint Officer for the purposes of this Policy based on the relevant laws & Company Policy objectives. All the grievances related to rights of Transgender Persons are addressed by the Complaint

officer to ensure compliance as per the “Transgender Persons (Protection of Rights) Act, 2019”. Complaints shall be addressed promptly, confidentially, and with empathy.

- i. The Complaints Officer nominated for the purposes of this policy is the senior most Company Doctor. Any relevant complaint must be addressed to the Complaints Officer in writing with necessary details and evidences. The relevant mail ID for the purpose is employeesgrievance@tdsgj.co.in.
- ii. TDSG is obligated to provide the transgender individuals a fair chance to actively engage in the investigation process related to a grievance raised under the provisions of this Policy. If, upon investigation, it is determined that the employee accused of discriminatory conduct is indeed guilty, appropriate disciplinary measures will be taken in accordance with the rules of the company.

Article 5 Confidentiality:

- All data related to the gender identity of transgender persons shall be kept confidential, subject to applicable law, unless disclosure is required by law or consented to by the individual. Conscious efforts are made to remove all discriminatory behavior at every step of work life and at every hierarchical level.

Article 6 Compliance:

- This policy complies with Transgender Persons (Protection of Rights) Act, 2019, and all other relevant laws and regulations. TDSG will periodically review and update this policy to ensure it remains in compliance with any changes in legislation.

Article 7 Implementation:

- TDSG will provide training to employees to create awareness about the right of transgender persons and to ensure that all employees understand and implement this policy.
- All new hires will be introduced to the policy during onboarding.
- The HR & Admin department will be responsible for implementation and enforcing this policy. Any concerns, requests for reasonable measures, or issues related to this policy to be addressed to HR & Admin department.
- This Equal Opportunity Policy shall be published on TDSG official website and displayed at conspicuous places in the workplace, including all HR communication platforms and notice boards.

Article 8 Amendments:

- TDSG reserves the right to amend the Policy from time to time in order to comply with any laws/rules/regulations that come into effect from time to time, related to Transgender Persons (Protection of Rights) Act, 2019.
- Any deviation from the provisions set in this policy will require approval from Management of the Company.

REVISION HISTORY

Version	Date of release	Summary of changes
v1	01-May-2025	Policy Introduced