

Anti-discrimination policy

1. Introduction

The anti-discrimination policy has been adopted by our organization to implement with our working system both in the office and the field.

2. Policy brief & purpose

Our anti-discrimination policy explains how we prevent discrimination and protect our employees, partners and stakeholders from offensive and harmful behaviors. This policy supports our overall commitment to create a safe and happy workplace for everyone.

Our organization complies with all anti-discrimination laws, including [Title VII of the Civil Rights Act of 1964, Americans with Disabilities Act (ADA) and Age Discrimination in Employment Act (ADEA.). We explicitly prohibit offensive behavior (e.g. derogatory comments towards colleagues of a specific gender or ethnicity.)

3. Scope

This policy applies to all employees, partners, visitors, customers and stakeholders.

4. Policy elements


Discrimination is any negative action or attitude directed toward someone because of protected characteristics, like race and gender. Other protected characteristics are:

- Age
- Religion
- Ethnicity/ nationality
- Disability/ medical history
- Marriage / civil partnership
- Pregnancy / maternity/ paternity
- Gender identity/ sexual orientation
- Caste

5. Discrimination and harassment

Our anti-discrimination and anti-harassment policies go hand-in-hand. We will not tolerate any kind of discrimination that creates a hostile and unpleasant environment for employees, interns or volunteers.

This is not an exhaustive list, but here are some instances that we consider discrimination:


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- Hiring managers disproportionately disqualifying male or female job candidates on purpose.
- Managers bypassing team members with specific protected characteristics (e.g. race) for promotion without being able to formally prove (e.g. with documentation) the reasons other employees were selected instead.
- Employees making sexist comments.
- Employees sending emails disparaging someone's ethnic origin etc.

Employees who harass their colleagues will go through our disciplinary process and we may reprimand, demote or terminate them depending on the severity of their offence.

We recognize that sometimes discrimination is unintentional, as we may all have unconscious biases that could be difficult to identify and overcome. In case we conclude that an employee unconsciously discriminates, we will support them through training and counseling and implement processes that mitigate biases as we indicate in the next section. But, if this person shows unwillingness to change their behavior, we may demote or terminate them.

We will not be lenient in cases of assault, sexual harassment or workplace violence, whether physical or psychological. We will terminate employees who behave like this immediately.

6. Actions to prevent discrimination

To ensure that our conduct and processes are fair and lawful, we:

- Use inclusive language in job ads and include EOI statements.
- Set formal job-related criteria to hire, promote and reward team members.
- Offer compensation and benefits according to position, seniority, qualifications and performance, not protected characteristics.
- Accommodate people with disabilities wherever it is possible
- Require managers to keep detailed records of their decisions concerning their team members and job candidates.

We will also consider additional measures to prevent discrimination, like:

- Using hiring processes that reduce bias like structured interviews and blind hiring programs.
- Organizing trainings on diversity, communication and conflict management to improve collaboration among employees of different backgrounds.


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7. What to do in cases of discrimination

If anyone is the victim of discriminatory behavior can talk to compliance and finance manager or Chief Executive officer as soon as possible. CFM is responsible for hearing employees claim, investigating the issue and determining punishment with consultation of the CEO.

Punishment for discriminatory behavior depends on the severity of the offence. For example, inadvertently offending someone might warrant a reprimand. Conversely, willfully bypassing employees for promotion because of a protected characteristic will result in termination.

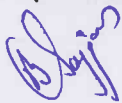
8. How we address discrimination complaints

CFM is proactive and responsive about determining whether discrimination occurs. For example, we:

- Look into similar claims about the same person or process to determine if discrimination is systemic.
- Track metrics and look into data that give us some insight on people's behaviors (e.g. percentage of job applicants of a certain race a hiring manager disqualifies).
- Evaluate testimonies on social media that visitors, job candidates or former employees have made.
- Conduct discreet interviews and gather information.

We will investigate all claims discreetly. We will never disclose who made a complaint to anyone or give out information that may help others identify that person e.g. which department or role they work in.

We all strive to prevent and address discrimination. We aware of our implicit biases and allow to speak up whenever colleagues are discriminated against.



Chief Executive Officer

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