

INCLUSION, DIVERSITY, EQUITY, AND ACCESSIBILITY POLICY

(Mahindra Logistics and Subsidiaries)

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Policy History

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01 March 2018	Edwin Lobo	Diversity & Inclusion Policy launched
01 April 2025	Supriya Rehill	Policy renamed to – Inclusion, Diversity, Equity & Accessibility
01 April 2025	Supriya Rehill	Amendments made in the policy related to Inclusion, PWD, Veteran

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Introduction

Mahindra Logistics and its operating companies are committed to fostering an inclusive, equitable workplace that values and supports diverse backgrounds, cultures, and perspectives. We provide equal opportunities for all employees and third-party workers, regardless of nationality, race, gender identity, sexual orientation, disability, age, religion, or family status.

Aligned with the **Transgender Persons (Protection of Rights) Bill 2019** and the **Rights of Persons with Disabilities (RPWD) Act 2016**, our policy ensures the protection of rights and full participation of marginalized groups, including transgender individuals and persons with disabilities.

We do not tolerate discrimination or harassment and are dedicated to creating a culture of respect, belonging, and accessibility across all interactions—employees, customers, suppliers, contractors, and communities. This policy embodies the principles of Inclusion, Diversity, Equity, and Accessibility (IDEA).

Scope

This policy applies to all employees, contractors, suppliers, stakeholders, and visitors at all levels within our organization. It encompasses all aspects of employment, including recruitment, promotions, compensation, training, and working conditions.

Equal Opportunity Employer Statement

We are an equal opportunity employer committed to strengthening inclusion, diversity, equity, and accessibility in the workplace. We do not tolerate any form of harassment or discrimination and welcome applications from all members of society regardless of nationality, race, colour, sex, religion, gender identity or expression, sexual orientation, physical or mental disability, HIV status, age, pregnancy or marital status, family or parental status, or any other status. We are also committed to providing reasonable accommodation to applicants with physical and mental disabilities.

Objectives to achieve our IDEA goals, we will:

- **Recruit and Retain:** Implement hiring practices that promote diversity by attracting talent from various backgrounds and ensuring fair and transparent processes.
- **Inclusive Leadership:** Provide training to all leaders to foster an inclusive workplace and embed IDEA principles into leadership practices.
- **Employee Resource Groups (ERGs):** Support the formation and operation of ERGs that provide platforms for underrepresented groups to network, share experiences, and advocate for positive change.
- **Equitable Advancement:** Ensure equal opportunities for professional development, promotions, and pay equity.
- **Accessibility in Practice:** Continuously review and enhance workplace accessibility, including accommodations for employees with disabilities and inclusive designs for all workspaces and digital tools.

Accountability and Implementation

- **Leadership Commitment:** Our leadership is responsible for demonstrating their commitment to IDEA principles by promoting these values at every level.
- **Measurement & Reporting:** We will track progress using clear metrics such as employee engagement surveys, diversity audits, and equity analyses, reporting our progress regularly.
- **Training & Development:** All employees will undergo IDEA training to raise awareness and understand the importance of diversity, equity, and accessibility.

Statement of Support for Women’s Empowerment Principles

As a signatory to the UN Women’s Empowerment Principles, we promote gender equality, empowering women in the workplace, marketplace, and community. We align with sustainability goals and use sex-disaggregated data to track and share progress with stakeholders.

The Women’s Empowerment Principles are as follows:

- Bring the broadest pool of talent to all endeavors
- Further the organization’s competitiveness
- Meet corporate responsibility and sustainability commitments
- Model behaviour within the organization reflects the society that it would like for it’s employees, fellow citizens and families
- Encourage economic and social conditions that provide opportunities for women and men
- Foster sustainable development

Definitions

Particular	Definition
Inclusion	Inclusion is fostering a work environment where all individuals have equal access, opportunities, and the ability to contribute to success.
Diversity	Diversity refers to the range of differences, including backgrounds, experiences, and perspectives, which strengthen our culture and drive innovation
Equity	Equity ensures fair, impartial treatment and access to resources, while challenging biases to support everyone’s success.
Accessibility	Accessibility focuses on creating environments and systems that are usable by all employees, including providing necessary accommodations for those with disabilities.
Sex	Refers to a person’s biological status and is typically assigned at birth, usually on the basis of external anatomy. Sex is typically categorized as male, female or intersex.
Gender	Refers to the characteristics of women, men, girls and boys (also called binary) that are socially constructed which includes norms, behaviours and roles associated with being a woman, man, girl or boy, as well as relationships with each other. Gender and sex are related to but different from gender identity. It encompasses a wide range of identities and

	expressions that may not fit within traditional binary categories.
LGBTQIA+A+	<p>It is the inclusive queer term which stands for lesbian, gay, bisexual, transgender, queer and/or questioning, intersex and asexual and/or allies which represents sexual identities other than lesbian, gay, bisexual, transgender and queer or questioning, including pansexual, asexual and omnisexual. The classification is basis one or more of the following -</p> <ul style="list-style-type: none"> • Sexual orientation: An inherent or immutable enduring emotional, romantic, or sexual attraction to other people. • Gender identity: A person's innermost concept of self as male, female, a blend of both or neither. • Gender expression: A person's external appearance of gender identity, usually expressed through behavior, clothing, haircut or voice, and which may or may not conform to socially defined behaviors typically associated with being either masculine or feminine. • Nonbinary is a term referring to a person whose gender identity does not align with a binary understanding of gender such as man or woman. A range of terms are used to refer to these experiences, nonbinary and genderqueer are among the terms that are sometimes used.
Intersex	It is an umbrella term used to describe people with differences in reproductive anatomy, chromosomes or hormones that don't fit typical definitions of male and female. Being intersex is not the same as being nonbinary or transgender, which are terms typically related to gender identity.
Ally	An "ally" is someone that aligns with and supports a cause with another individual or group of people. A straight ally, more specifically, is an individual outside of the LGBTQIA+A community, that supports their fight for equality and rights.
Partners	"Partners" is defined as the same-sex couple having a similar relationship as a married couple.
Transgender	Transgender people have a gender identity or gender expression that differs from their sex assigned at birth. Some transgender people who desire medical assistance to transition from one sex to another identify as transsexual.
Gender Transition	<p>The process of changing one's gender presentation or sex characteristic to match one's gender identity. This involves transitioning legally, socially, and/or medically (re-assignment therapy).</p> <p>Transitioning can include any, none, or all of the following:</p> <ul style="list-style-type: none"> • Telling one's friends, family, and co-workers • Changing one's name and pronouns • Updating legal documents • Medical interventions such as hormone therapy; or surgical intervention, often called gender confirmation surgery

IDEA Council

The IDEA Council, chaired by the CHRO, is a passionate group of colleagues driving diversity, equity, inclusion, and accessibility across the organization. They lead initiatives to identify and address systemic barriers, promote education and awareness, and foster a culture of belonging and respect for all employees at MLL and its subsidiaries.

Employee Resource Groups

Our Employee Resource Groups (ERGs) build community and promote diversity and inclusion. Open to all employees and allies, ERGs focus on hiring, growth, retention, and amplifying underrepresented voices. Join and contribute to drive inclusivity!

To join any of the ERG's you can reach out to MLLHR at MLLHR@mahindralogistics.com

Here are our 5 ERGs:

Employee Resource Group (ERG)
PRERNA (Empowering Women)
SABAL (Persons with Disabilities)
Rising Stars (Management Trainees)
Rainbow Network (LGBTQIA+ & Allies)
VEER (Veterans)

Inclusive Communication

All employees are encouraged to use gender-neutral and inclusive language in both internal and external communications. All company materials, including policies and updates, will be drafted and published using gender-neutral language.

- Gender-Neutral Language**
 This involves referring to people without assuming their gender. For example, use "they" instead of "he" or "she," and address groups as "everyone" instead of "hey, guys."
- Gender-Neutral Salutations and Pronouns**
 Use gender-neutral salutations like "Mx" (Mix) and neopronouns like "ze/hir" or "they/them" when unsure of someone's preferred pronouns.
- Pronouns**
 Pronouns such as he/him, she/her, or they/them help avoid assumptions about gender identity. Employees are encouraged to include their preferred pronouns in email signatures, business cards, and other documents to foster a respectful, inclusive environment.

PRIDE Inclusion

The Transgender Persons (Protection of Rights) Bill 2019 was passed by the Parliament; it was passed by the Rajya Sabha on 26th November 2019 and by the 17th Lok Sabha on 5th August 2019. The focus of the bill is to benefit the transgender persons by:

- Mitigating the stigma, discrimination, and abuse against them
- As well bring them into the mainstream of society and make them productive members of society.

With the same spirit and as an equal opportunity employer, the organization aims at creating an inclusive environment and providing hiring transgender persons and the LGBTQIA+ community in company's operations.

Supporting PRIDE Policies and Programs

We are committed to building a workplace where LGBTQIA+ employees feel respected, supported, and empowered to thrive. Our policies and programs are designed to uphold dignity, enable access to benefits, and foster belonging across the employee lifecycle.

- **Sensitization & Awareness**

We conduct regular sensitization programs to promote awareness, reduce bias, and build allyship. These sessions aim to create a culture where LGBTQIA+ employees are treated with dignity and respect at every level.

- **Self-Identification and Confidentiality**

Employees can voluntarily self-identify their gender identity and orientation through Nectar (Darwinbox). This information is handled with strict confidentiality and reflected across internal systems such as email IDs, directories, and HR records—only with the employee's consent.

- **Gender Identity and Chosen Name Recognition**

Transgender and non-binary employees have the right to use their chosen name, pronouns, and salutation across all platforms—email signatures, business cards, ID badges, etc. HR will facilitate the necessary updates upon request, aligning systems to reflect the individual's identity.

- **Medical Benefits**

- Same-Sex Partner Coverage: Company-sponsored medical insurance covers declared same sex partners.
- Gender Affirmation Support: Employees with a minimum of 2 years of service are eligible for reimbursement of up to ₹5 lakhs towards gender affirmation procedures, upon declaration. Please refer to the Employee Insurance Policy for further details. *More details in the gender affirmation policy (coming soon)*

- **Transition Support**

HR and managers are sensitized to ensure respectful and confidential handling of gender transition journeys. We provide guidance and emotional support through the process.

- **Gender-Neutral Washrooms**

Wherever possible, gender-neutral washrooms are made available. HR and site leads must ensure appropriate facilities are in place prior to onboarding PRIDE employees.

- **Parental Leave and Benefits**

In accordance with the New Parent Policy, PRIDE employees can avail of caregiver leave and related benefits based on their self-declared role as a primary or secondary caregiver. Refer to the New Parent policy for more details.

- **Mental Health Support**

Confidential counseling services are available to PRIDE employees and their same-sex partners via the Employee Assistance Program (EAP).

Ability Inclusion

As an Equal Opportunity Employer, the organization is committed to providing equal opportunities to individuals with physical disabilities in line with the Rights of Persons with Disabilities Act, 2016. We will ensure compliance with all relevant laws, offering necessary facilities, training, and support to enable employees with disabilities to perform their roles effectively.

Key Areas of Focus:

- **Identification & Recruitment:**
We focus on hiring individuals with disabilities, identifying suitable roles and making reasonable accommodations. Our recruitment process is transparent, merit-based, and free from bias.
- **Infrastructural Support:**
We ensure barrier-free access to facilities, transportation, and communication systems. Necessary tools and software are provided, along with relevant training, to help employees succeed.
- **Sensitization & Awareness:**
We conduct awareness programs to foster inclusion and support for employees with disabilities.
- **Compliance:**
Employees with disabilities must provide relevant documentation (e.g., Form IV) to receive necessary adjustments and accommodation.

Veteran Inclusion

We offer career opportunities to veterans through the VEER program and through direct hiring, recognizing the valuable skills and leadership they bring. The program outlines a detailed plan to help veterans transition into the workforce while enriching our organization with diverse perspectives.

Veteran Identity and Rank Recognition

We deeply value the service and leadership experience that veterans bring to our organization. Veterans hired into the company have the **option and full autonomy to retain and use their military rank or title** in internal and external professional contexts, where appropriate.

This may include, but is not limited to:

- **Email signatures** (e.g., Lt. Col. [Name] (Retd.))
- **Visiting cards**
- **Nameplates**
- **Conference name tags or badges**

We recognize that military identity is an integral part of one's professional journey, and honoring it reinforces **respect, pride, and belonging**. This is entirely voluntary and based on the individual's preference.

Human Rights perspective

All business units must assess investments from a Human Rights perspective, covering:

- New projects, joint ventures, vendor partnerships, and acquisitions.
- Compliance with customer Human Rights standards.
- Agreements should include clauses for Human Rights adherence. Special care is needed in

countries with weak Human Rights laws.

Key criteria:

- Employee rights and freedom of association.
- No forced or child labor.
- Equal opportunity regardless of gender, caste, religion, or nationality.

Inclusive Behaviour Responsibilities for All Employees and Managers:

Everyone is responsible for fostering an inclusive environment free from discrimination, harassment, and bullying. This includes:

- **Respecting dignity and diversity** of all individuals.
- **Creating an inclusive environment** by avoiding discriminatory comments, gossip, rumors, bullying, sexist or racist remarks, and microaggressions.
- **Being aware of unconscious bias** and its potential to hinder inclusion and collaboration.
- **Focusing on conscious inclusion**, ensuring that actions drive diversity, equity, and belonging.
- **Using inclusive language** and demonstrating respectful behavior in all interactions.
- **Committing to individual IDEA-related goals** as part of personal development and company objectives.
- **Engaging in inclusive hiring and talent practices** to ensure diverse representation and drawing from a broad talent pool that reflects the communities we serve.
- **Providing accommodations** for individuals with disabilities and those requiring religious observances.
- **Encouraging open collaboration** and respecting diverse opinions and perspectives.
- **Reporting any incidents** of discrimination, harassment, or bullying to HR or the Grievance Committee.
- **Addressing any behaviors** that are inconsistent with inclusion, equal opportunity, and company policies.

Everyone, regardless of role, plays a critical part in creating and maintaining an inclusive culture. Any breach of these behaviors, including discrimination or harassment, will result in appropriate action.

Disciplinary and Grievance Procedures: Supporting an Inclusive Workplace

Every employee has the right to a workplace free from harassment, bullying, or offensive conduct. Harassment by colleagues, managers, or non-employees is strictly prohibited and will not be tolerated.

Prevention of Sexual Harassment at the workplace Policy:

A comprehensive, inclusive policy applies to all employees, regardless of gender, gender identity, or gender expression. Any employee, including LGBTQIA+ individuals, who reports an incident of sexual harassment will have their complaint investigated by the Internal Complaints Committee, as outlined in the Policy on Prevention of Sexual Harassment at Work.

Anti-Harassment and Anti-Bullying Guidelines:

The organization takes a zero-tolerance stance on harassment or bullying towards anyone. Additionally, employees must use respectful language when interacting with or discussing persons with disabilities or LGBTQIA+ colleagues and respecting their gender, abilities, relationships, and identities.

Derogatory terms or assumptions about sexual orientation or gender identity are strictly prohibited and will be addressed immediately. Refrain from using harmful terms like 'dyke,' 'fag,' 'queer,' or 'tranny', "handicap", "disabled", "mad", "retarded" to describe anyone.

Harassment or bullying of non-employees, including professional relationships, is also prohibited. To address the challenges of marginalized communities and ensure safe, supportive reporting, All incidents should be reported in writing to the respective HR or the IDEA team at MLLHR@mahindralogistics.com

The following guidelines ensure fair handling of disciplinary and grievance matters:

Confidentiality and Fairness

- All cases of grievance, harassment, or misconduct will be handled confidentially to protect the dignity and privacy of those involved.
- Evidence, such as witness statements, may be shared with employees in a manner that respects sensitivity and ensures fairness (e.g., summaries for harassment cases).

Empowering Employees to Speak Up

- Every employee has the right to raise concerns about discrimination, harassment, or unfair treatment without fear of retaliation.
- Concerns may include discrimination based on gender, age, sexual orientation, race, religion, disability, gender identity, pregnancy, or marital status.
- All concerns should be reported in writing to the respective HR or the IDEA team at MLLHR@mahindralogistics.com

Inclusive Reporting Mechanisms

- Employees are encouraged to report inappropriate conduct promptly, either orally or in writing to their respective HR or the IDEA team.
- Reports can address personal experiences or observed misconduct affecting others.

Commitment to Resolution

- All reports will be investigated impartially, with transparency and respect for inclusion principles.
- HR teams will ensure processes are equitable and free from bias, prioritizing the wellbeing of all individuals involved.

Prohibition of Retaliation

The organization strictly prohibits any threats or acts of retaliation against individuals who:

- Report conduct they reasonably believe violates this policy.
- Provide information in good faith during the investigation of such conduct.
- Any retaliatory behavior will be treated as a serious violation of this policy, subject to disciplinary action, including termination of employment.

Accountability and Compliance

- Failure to adhere to this policy or engage in inclusive behaviors will result in serious disciplinary action, up to and including dismissal.

- Employees are urged to report concerns in good faith to uphold a workplace culture of respect, belonging, and fairness.

Failure to Comply

Employees who do not comply with this Policy and/or are found to have engaged in discrimination, harassment, or bullying, will be subject to appropriate disciplinary action, up to and including termination of employment.

Review

This policy will be reviewed annually to ensure its effectiveness, relevancy, and alignment with evolving best practices in inclusion, diversity, equity, and accessibility.

By following the provisions of this policy, we can maintain fair, transparent, and efficient work environment that supports both business goals and employee well-being. The Company reserves the right to amend this policy at any time to reflect evolving business needs and legal requirements. Any Exceptions will require prior written approval from the CHRO or the MD & CEO