



3M India Limited
EQUAL OPPORTUNITY FOR PERSONS WITH DISABILITIES STANDARD

Applies To

This standard applies to all employees of 3M India Limited and all entities of 3M operating in India (Hereinafter collectively referred to as “3M”).

Introduction & Background or Purpose

At 3M, we recognize the value of a diverse workforce. We are committed to providing equal opportunities in employment and fostering an inclusive workplace where all employees are treated with respect and dignity. We believe that having a workplace that is truly diverse, not only in terms of gender and ethnicity, but also in terms of diverse abilities will help us create value for our employees as well as for our customers.

This Equal Opportunity Standard for Persons with Disabilities is in accordance with the provisions of the Rights of People with Disabilities Act 2016 and Central Government Rules – 2017 – Government of India. Our intention is to abide by the principles of the standard in spirit and in letter.

Requirements

This Standard covers all employees with disabilities in 3M. They could be job applicants, full-time/part-time employees, interns/trainees, contractual employees, including temporary employees. It also covers those employees who acquire disability during their work tenure with 3M.

The Standard applies to all aspects of employment, through the employment journey at 3M including recruitment, selection, orientation, training, working conditions, salaries, transfers, employee benefits and career advancements and career moves.

3M is committed to providing equal opportunities to all and to eliminating all forms of unlawful discrimination (which includes direct discrimination, indirect discrimination and denial of reasonable accommodation), bullying and harassment of employees with disabilities.

We encourage candidates with diverse abilities to apply. Our decisions on selection, employment, career progression, training or any other benefits are solely based on merit. We follow an inclusive evaluation process by ensuring that a person with disability is provided with any suitable flexibility and accommodation that may be required so that she/he may be evaluated fairly. Reasonable adjustments to the recruitment process will be made as required to ensure that no applicant is disadvantaged because of his/her disability.

If an employee acquires a disability during her/his employment tenure at 3M, she/he is encouraged to return to work at the same grade as before. In case the employee is unable to perform the current job, 3M will invest in re-skilling the employee for another position at the same level or higher. Reasonable accommodation/adjustment to facilities will be provided to help the employee to perform at the same level as before.

3M is committed to promoting awareness on equal opportunity and inclusion of people with disabilities among all employees by organizing training and sensitization programs and campaigns. We will do this by working closely and collaborating with our CSR partners as well as with DAN, our Diverse Abilities Network – our ERN, that is dedicated to promoting a culture of inclusion through Allyship within the organization.



1. Additional Elements

1.1 Definitions as per the RPWD Act, 2016

- a. **“Person with disability”** means a person with long-term physical, mental, intellectual, or sensory impairment which, in interaction with barriers, hinders his/her full and effective participation in society equally with others.
- b. **“Person with bench mark disability”** means a person with not less than forty percent of a specified disability where specified disability has not been defined in measurable terms. It also includes a person with disability where specified disability has been defined in measurable terms by a certifying authority.
- c. **“Specified disabilities”** are the disability categories mentioned in the Schedule of the Act.

There is also “any other category”, which allows the Central Government to add any other disability by issuing a notification.

The disability categories as mentioned in the Schedule are:

- Locomotor disability
 - Muscular Dystrophy
 - Leprosy cured
 - Dwarfism
 - Cerebral Palsy
 - Acid attack Victim
 - Low vision
 - Blindness
 - Deafness
 - Hard of Hearing
 - Speech and Language disability
 - Intellectual Disability
 - Specific Learning Disability
 - Autism Spectrum Disorder
 - Mental illness
 - Chronic Neurological Conditions
 - Multiple sclerosis
 - Parkinson’s disease
 - Haemophilia
 - Thalassemia
 - Sickle Cell disease
 - Multiple Disabilities
 - Any other category (as may be notified by the Central Government from time to time)
- d. **“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.



- e. **“Discrimination”** in relation to disability, means any distinction, exclusion, restriction based on disability which is the purpose or effect of impairing or nullifying the recognition, enjoyment or exercise on an equal basis with others of all human 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.
- f. **“Reasonable accommodation”** means necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden in a particular case, to ensure persons with disabilities enjoy or exercise equal rights as others.

1.2 Facilities and amenities

a. Physical Infrastructure

- 3M will ensure suitable facilities and infrastructure are provided to employees with disabilities to enable them to effectively discharge their duties in the establishment.
- 3M aims to build the requisite physical infrastructure (buildings, furniture, facilities and services in the building/campus) that 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. 3M shall also revamp its existing buildings after site accessibility assessments and we shall aim to do this by 2024.
- Any new facility that is built, renovated or leased will be evaluated for compliance with accessibility standards that will be specked in at different stages of the building construction. Any employee facing accessibility issues should report to the facilities team at their location or write to the Liaison Officer.

b. Reasonable Accommodation

3M will make reasonable accommodations, whenever necessary, for qualified employees or job applicants who have disabilities, as per The RPWD Act.

Such accommodation would be provided:

- To ensure equal opportunity in the application and selection process, to enable an employee with a disability to perform the essential functions of a job, and to enable an employee with a disability to enjoy the same benefits and privileges of employment as non-disabled employees.
- Examples of reasonable accommodations may include (but not limited to) acquiring or modifying equipment or devices, modifying assessment, and training materials, modifying work schedules, reassignment to a vacant position, taking extra leave for a reason related to her/his disability.
- Such requests for reasonable accommodation can be made by the employee directly to the supervisor or through HR or through the designated Liaison Officer appointed by the Company.

c. Job Opportunities for People with Diverse Abilities

At 3M, we aim to identify and reserve job positions that can be performed at all levels by people with diverse abilities. We commit that we will fill these positions on the basis of merit and the candidates' abilities and competence to do the job.



d. Selection Process

Positions that are identified and reserved for people with disabilities will be advertised on appropriate channels of communication and platforms.

Our intent is to:

- Ensure that all our existing sourcing channels and methods are inclusive
- Collaborate with disability organizations to attract suitable talent to fill these position

e. Career Development and Career Progression

At 3M, our endeavor is to sustain an environment, where opportunities to learn, grow and develop is embedded in our Culture pillars and espoused in our philosophy of Development for All and You Own your Career. Thus, learning journeys and career journeys are available to everyone in 3M and decisions are always based on merit.

3M will ensure that any reasonable accommodation that needs to be made to attend development programs, whether in terms of access or infrastructure will be done in a sensitive and empathetic manner.

f. Travel, Stay and Transport

For official travel (local, outstation and international), employees with disabilities will be provided reasonable accommodation such as door pick-up and drop, air travel (in case road/train travel is inaccessible), accessible guest houses and hotels (where available) and allowing a personal attendant to travel alongside if required, as per our reasonable accommodation guidelines.

g. Events and Employee Engagement

3M 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.

1.3 Governance

3M has a very robust DE&I (Diversity, Equity, and Inclusion) Council which is chaired by the Managing Director and with members from the India Leadership Team. Further, the chair of our Diverse Abilities Network is also a key member of our DEI council. The purpose and charter of the DEI council is to drive the global charter of creating and sustaining a diverse, equitable and inclusive work environment which upholds the values, principles and promises of 3M to its employees and its stakeholders

The DE&I council will:

- Ensure compliance with the applicable provisions mandated for private establishments under The Rights of Persons with Disabilities (RPWD) Act, 2016.
- Plan and allocate budget for driving the persons with disability charter under DAN effectively and efficiently.
- Have oversight over the rightful implementation of this standard.



a. Liaison Officer

As per the mandate of the RPDWD Act 2016, 3M will **appoint the Chair of the dAN network** as the Liaison Officer. She/he will coordinate with the various concerned departments and provide subject matter expertise to implement the plan prepared by the dAN as well as the disability charter under the DEI council. She/he will also be responsible for ensuring that employees and job applicants with disabilities receive the needed reasonable accommodation for performing their job and participating in the selection process on an equal basis with others. She/he will also raise awareness among all employees in the company to create an inclusive work environment. She/he will present a progress report to the DEI Council every quarter.

b. Role of Human Resources

The Human Resources Department have the functional responsibility for ensuring compliance with the provisions of this standard. They should proactively take steps to ensure that all employees are sensitized and there is no discrimination in recruitment, training, career development and other aspects of employment. They should also act as flag bearers as well as gate keepers to create and sustain the behaviours that contribute to an inclusive workplace.

c. dAN – Diverse Abilities Network

This Employee Resource Network was launched in 2022 in 3M India with the explicit purpose of making a difference in our 3M Community by supporting people with disabilities and those whose lives are touched by them. Under the ambit of 4 Pillars – Awareness, Facility, Role Identification/Job identification, Hyper Care – this ERN will work with the DE&I council to make this standard come to life, so that the principles of this standard are followed both in spirit and in letter.

1.4 Maintenance of Records

3M is designing a robust and well-defined process, with the help of our Occupational Health and Safety team, to capture and maintain the records of employees related to disability as defined under the RPWD Act 2016. 3M understands and respects that sharing information about one’s disability is purely a personal preference, and nobody is mandated to do so. Employees who have a disability or medical condition and wish to share the information can fill the Voluntary Self- Identification /Disclosure as laid out in the process below.

To help employees/CW’s declare any disabilities they may declare so on Volunteer Basis using the link attached below, this is in-line with RPWD act 2016. This data will be stored in 3M Occupational health data collection platform “MEDGATE” and all the information collected will be considered as 3M Restricted data.

Portal link for self-disclosure:

<https://medgate.mmm.com/prod/medicalpublicqrh/login.rails?qcode=QUESTINDIS&language=English>

Note: The person must connect to VPN to get behind 3M’s firewall, so ensure you are connected to VPN

Access to the data is given only to the EHS Leader, the Leader of DAN and to the HR team. Confidentiality of the data will be maintained with certain exceptions like data being made available for security and other relevant functions for ensuring reasonable accommodations.

The information will be shared on need basis, at the discretion of the above 3 officers of the company.



1.5 Grievance redressal process

3M's goal is to have a work environment that reflects and values the best in everyone, where people treat each other respectfully and professionally, and where individual differences are valued. Behaviors that interfere with that goal—including harassment, discrimination, bullying, or other inappropriate communication or behavior—will not be tolerated.

3M prohibits discrimination based on race, color, age, gender, gender identity, sex, national origin, citizenship status, disability, religion, creed, sexual orientation, marital status, pregnancy, or genetic information. 3M also complies with anti-discrimination law everywhere we do business.

The above principles are very clearly laid out in our Respectful Work Environment principle – which is available to all employees on 3M GO - [Respectful Work Environment Principle \(sharepoint.com\)](https://sharepoint.com)

Any violation of this principle especially with respect to harassment, discrimination or bullying of employees with disabilities can be reported.

1.6 How to Report a Violation

To report suspected violations of this Principle, employees can contact their supervisor or manager, assigned Human Resources leader, or any senior manager in Human Resources . Employees can also use 3MEthics.com or any of the additional reporting options listed in the "Report Concerns or Ask Questions" section of the Ethics & Compliance website

Failure to comply with these requirements may result in discipline, up to and including termination of employment, unless otherwise prohibited by law.