



## HIV / AIDS Policy for Flair Writing Industries Limited and its Subsidiary Companies

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### FLAIR WRITING INDUSTRIES LIMITED. HIV POLICY WITH IMMEDIATE EFFECT

#### I. **PURPOSE:**

The objective of the policy is to establish a framework for preventing discrimination against employees and job applicants based on their HIV status, protecting the rights of individuals affected by HIV/AIDS, and creating a safe and supportive work environment.

This policy is in accordance with the HIV and AIDS (Prevention and Control) Act, 2017 and the HIV and AIDS Policy for Establishments, 2022.

#### II. **SCOPE:**

This policy applies to all employees, job applicants, and contract workers of Flair Writing Industries Ltd & its subsidiary companies (hereinafter referred to as 'The Company') It extends to all aspects of employment, including recruitment, hiring, promotion, training, compensation, benefits, termination, and workplace conduct.

#### III. **POLICY PRINCIPLES**

**Non-Discrimination:** The Company prohibits any form of discrimination against individuals based on their actual or perceived HIV status.

#### IV. **CONFIDENTIALITY:**

The Company will maintain the confidentiality of employee HIV-related information through:

- Awareness and Education: The Company will provide regular training and awareness programs to all employees to promote understanding and prevent HIV transmission.
- Safe and Healthy Work Environment: The Company is committed to providing a safe, non-stigmatizing, and supportive work environment for all employees, regardless of their HIV status.

#### V. **PROHIBITED ACTS:**

The Company strictly prohibits the following acts:

1. Discrimination in employment-related decisions based on HIV status. Denying employment opportunities to qualified individuals solely based on their HIV status.
2. Termination of employment based on an employee's HIV status, unless it poses a significant risk of transmission to others, and this cannot be mitigated by reasonable accommodation.
3. Requiring HIV testing as a pre-condition for employment, promotion, or any other employment benefit.
4. Disclosing an employee's HIV status without their informed consent, except when required by law or for occupational health and safety reasons, where stringent safeguards are in place.

5. Any form of harassment, stigmatization, or victimization of employees based on their HIV status.
6. Restricting an employee's movement or access to The Company facilities based on their HIV status.

VI. **REASONABLE ACCOMMODATION:**

The Company will take measures to extend reasonable accommodation to employees with HIV/AIDS related illnesses. This could include flexible working hours, opportunities for rest breaks, time off for medical appointments and necessary sick leave but within scope of Leave policy.

VII. **CONFIDENTIALITY DISCLOSURE:**

All employees are required to maintain the confidentiality of any HIV-related information they may acquire in the course of their employment.

Disclosure of an employee's HIV status will only be made with the employee's informed consent, or as required by law.

VIII. **AWARENESS AND TRAINING:**

The Company will conduct regular training sessions for all employees to:

- Provide accurate information about HIV/AIDS, its transmission, and prevention.
- Promote understanding and reduce stigma related to HIV/AIDS.
- Educate employees about this policy and their rights and responsibilities.

IX. **Grievance Redressal Mechanism for HIV/AIDS Discrimination**

**A. Establishment of Mechanism:**

The Company is committed to establishing and maintaining a fair and transparent grievance Redressal mechanism to address all complaints related to discrimination against employees or job applicants based on their HIV/AIDS status.

**B. Designation of Complaints Officer:**

A designated Complaints Officer is empowered to receive, investigate, and resolve complaints related to HIV/AIDS discrimination.

The current designated Complaints Officer is Ms. Vijaya Mallya, and grievances can be reported to them at [vijaya@flairpens.com](mailto:vijaya@flairpens.com).

**C. Reporting a Grievance:**

Any employee or individual who has concerns about stigmatization or discrimination related to HIV/AIDS can report their grievance to the Complaints Officer.

Complaints should be made in writing.

If a complaint cannot be made in writing, the Complaints Officer will provide assistance to the complainant to file the complaint in writing.

#### **D. Timeframe for Complaints:**

Complaints should be submitted within three months from the date the complainant became aware of the alleged violation.

The Complaints Officer may extend this time limit by an additional three months if satisfied that circumstances prevented the complainant from filing within the initial period.

#### **E. Complaint Handling Process:**

##### **Acknowledgement and Registration:**

- I. Upon receiving a complaint, the Complaints Officer will provide an acknowledgment to the complainant.
- II. The complaint will be recorded in electronic form.
- III. Each complaint will be assigned a sequential number.

#### **F. Investigation:**

The “Investigating Committee” will conduct a thorough and impartial investigation of the complaint.

##### **Timeline for Decision Making:**

The Complaints Officer will make a decision on the complaint promptly, ideally within seven working days.

In emergencies or cases involving healthcare establishments where the complaint relates to discrimination in the provision of or access to healthcare services or universal precautions, the Complaints Officer should decide the complaint on the same day the complaint is received.

#### **G. Decision-Making Powers:**

- I. If the Complaints Officer determines that a violation of the Act has occurred, they will take the following actions:
  - a) Direct the establishment to take measures to rectify the violation.
  - b) Counsel the person who committed the violation.
  - c) Require the person to undergo training related to HIV/AIDS, the provisions of the Act, rules, guidelines, and aspects of stigma and discrimination.
  - d) Impose social service for a fixed period, potentially in collaboration with an NGO working on HIV/AIDS (with assistance from the District AIDS Prevention and Control Unit or State AIDS Control Society).
- II. For subsequent violations of the Act by the same person, the Complaints Officer may recommend disciplinary action to the establishment, in accordance with the law.

#### **H. Principles of the Grievance Procedure:**

- I) **Confidentiality:** The grievance procedure will ensure the confidentiality of all parties involved.
- II) **Impartiality:** The process will be conducted in an objective and independent manner.
- III) **Timely Resolution:** The mechanism aims to resolve grievances promptly.

IV) This process is designed to align with the HIV and AIDS (Prevention and Control) Act, 2017, and related guidelines, ensuring a fair, transparent, and effective way to address HIV/AIDS-related discrimination within The Company.

**I. Review and Amendment**

This policy will be reviewed periodically and updated as necessary to reflect changes in legislation, regulations, or best practices.

**J. Dissemination of Policy**

This policy will be communicated to all employees through appropriate channels, including but not limited to:

- I) Company intranet / website
- II) Policy handbook
- III) Notice boards
- IV) Training sessions