

HIV / AIDS Policy
OF
VIRAJ PROFILES PRIVATE LIMITED
(effective from 01/04/2026)

HIV/AIDS Policy

Viraj Profiles Private Limited

Introduction: Viraj Profiles Private Limited acknowledges the global impact of the HIV/AIDS epidemic and is committed to addressing this issue through non-discrimination, awareness, prevention, and health care support. This policy is applicable to all employees of the Company and its subsidiaries and is designed to create a safe, respectful, and supportive work environment.

AIM: The policy aims to:

- (1) Generate awareness on HIV and AIDS in the Company.
- (2) Prevent transmission of HIV infection amongst the employees/workers.
- (3) Protect rights of those infected with and affected by HIV and AIDS.
- (4) Ensure safe, non-stigmatised and non-discriminatory environment assuring equity and dignity at The Company.
- (5) Provide conducive working environment and maintaining the confidentiality of HIV-related data for protected employees/persons.

SCOPE: The policy applies to all the employees of the Company across all the locations and workplace the Company operates.

The Policy is based on following facts about HIV and AIDS:

- (1) The known routes of transmission of the Human Immunodeficiency Virus (HIV) are through:
 - (a) Unprotected sexual contact with a HIV infected person;
 - (b) Sharing of HIV infected needles or syringes;
 - (c) From HIV infected mother-to-child during pregnancy, childbirth or breast feeding; and
 - (d) Transfusion of HIV infected blood or blood products.
- (2) With the advent of Anti-Retroviral Therapy, HIV is now a chronic manageable disease like many other non-communicable diseases, including diabetes, hypertension and asthma. There is no scientific or epidemiological evidence to suggest that HIV can be transmitted through ordinary workplace contact (talking to or touching the person, using the same office equipment, tools, utensils or bathroom as a person infected with HIV). In special situations where there may be a potential risk of exposure, for example healthcare workers who may be exposed to blood or blood products, there are specific and appropriate infection-control measures known as Universal Precautions that ought to be followed. Transmission is therefore not likely in the regular workplace setting.
- (3) People with HIV who are regular on Anti-Retroviral Therapy remain healthy and fit to work for several years despite their infection.
- (4) With the availability of Anti-Retroviral Therapy, the life of people living with HIV has prolonged substantially and they lead a normal productive life.

GUIDING PRINCIPLES FOR THE COMPANY

The Company adopts three key principles mentioned in the HIV and AIDS (Prevention and Control) Act, 2017 in this policy. These principles have been adopted by the Company in the spirit in which they are mentioned:

These principles include:

- **Non-discrimination** against people infected with and affected by HIV and AIDS
- **Confidentiality** related to individual's HIV status and HIV-related data
- **Grievance redressal mechanism** in the form of Complaints Officer

(i) NON DISCRIMINATION:

The policy strongly outlines that there should be no discrimination on the basis of perceived or real HIV status of any employee. This protection is provided not only to an HIV positive person, but also extends to immediate family members and progeny who reside or have resided in the same house of HIV infected person too.

Here discrimination is prohibited not only against employee(s) infected with HIV and AIDS but also against people affected by HIV and AIDS. This may include other people living, cohabiting and residing with an HIV positive employee. It also encompasses other people who have lived, resided or cohabited with an HIV positive employee in the past.

An employee cannot be discriminated on the basis of HIV status at any setting and the following tenets (fundamental principle) needs to be complied–

(a) Absence of discrimination at workplace – An employee should not be discriminated at the workplace on the basis of his/her HIV status.

Discrimination here includes the denial of, or termination from employment and also unfair treatment at the workplace. The Company may also provide a reasonable accommodation to people living with HIV if need be. Reasonable accommodation means minor adjustments to a job or work that enables an HIV positive employee, who is otherwise qualified to enjoy equal benefits or to perform the essential functions of the job or work, as the case may be.

(b) Public utilities and resources – An employee should not be discriminated against using public utilities and sharing resources on the basis of HIV status.

(c) Segregation – An employee should not be segregated on the basis of HIV status. Thus, he or she or others cannot be isolated and ostracized (social exclusion) on the basis of HIV status.

(d) HIV testing as pre-requisite for obtaining employment is prohibited – HIV testing as a pre-requisite for obtaining employment, or accessing healthcare services, or for the continuation of the same or for accessing or using any other service and facility at workplace is completely prohibited.

Discrimination against people infected with and affected by HIV and AIDS is prohibited across the Company and in addition, HIV test cannot be pre-requisite for obtaining employment or accessing healthcare services under the Group Medclaim Policy.

In case of contravention of the aforesaid rights, the aggrieved employee has a choice to file a complaint with the **Complaints Officer** (details of which are shared under the “Grievance Redressal Mechanism” section).

(ii) CONFIDENTIALITY RELATED TO HIV STATUS AND HIV-RELATED DATA-

1. Confidentiality related to HIV status – An HIV positive employee cannot be forced to disclose his or her or their status or any other HIV-related information. HIV-related information means any information relating to the HIV status of a person and includes (a) information relating to the undertaking given for performing the HIV test or result of an HIV test; (b) information relating to the care, support or treatment of that person; (c) information which may identify that person; and (d) any other information concerning that person, which is collected, received, accessed or recorded in connection with an HIV test, HIV treatment or HIV-related research or the HIV status of that person.

The Company does not ask for or mandate any employee or candidate for a position, to disclose their HIV/AIDS status, neither as a pre-condition nor at a later stage for any reason. In an event the Company is exposed to this information related to an employees’ HIV status, the Company is bound not to disclose this information without the proper consent of the employee/candidate. An important pre-condition related to the disclosure is that it has to be made in person by the employee and after proper counselling. It is also the moral responsibility of co-workers and other staff members to not engage in activities which breach confidentiality.

The Company will not save, preserve or document any information pertaining to the HIV and related details of any employee or candidate for a position. Any information to which the Company is exposed to unknowingly or in an unwanted manner, must be destroyed with immediate effect by the consent of the employee/candidate and the Complaints Officer. No trace or trail of such a detail or information must be preserved in any form or manner. The only exception to this can be in case of complaints which are files formally with the Complaints /Grievance Redressal Officer, only with the intent to document the complaint and the steps taken to address such a complaint leading to a proper closure.

Confidentiality of data related to HIV: HIV-related information is very sensitive in nature and keeping the records of HIV-related information and the Company shall adopt data protection measures to ensure prevention of unintended or unwanted disclosure and breach of confidentiality of the data:

Here HIV-related information includes–

- (a) information relating to the undertaking performing the HIV test or result of an HIV test;
- (b) information relating to the care, support or treatment of that person;
- (c) information which may identify that person; and
- (d) any other information concerning that person, which is collected, received, accessed, or recorded in connection with an HIV test, HIV treatment or HIV-related research and the HIV status of the employee.

It is the responsibility every employee/department/Complaints Officer of the Company having access to the HIV related information of the protected person to keep the said data protected from disclosing to any person and the Complaint officer shall lay down the procedure/processes/systems for accessing/protecting/securing HIV related information of the protected person. It is the responsibility

and accountability of the person having knowledge of or stored the aforesaid information to keep the said information confidential.

Every person including the Employees of the Company must ensure following:

(1) Protecting information from disclosure of HIV-related information- Confidentiality and privacy is to be maintained while collecting HIV-related information.

(2) Access to HIV-related information: Access should be granted only to authorized persons or staff. There should be provision of signing a formal undertaking for confidentiality of the information from the authorised person.

(3) Provision for security systems for HIV-related information- There should be secured almirahs or cabinet for physical records like registers, reports etc. and it should be carefully locked when left unattended. Personal Computers or mobiles or tablets or any other hardware should be password protected and should be logged off or locked when left unattended for protecting electronic records.

(4) Data Management Committee- Data Management Committee should be formed at each establishment to review and provide appropriate recommendation regarding the data security measures and the Data Management Committee should be responsible to ensure the same. Wherever establishment does not have the Data Management Committee, the head of the establishment should be entrusted with the responsibility and function of the Data Management Committee.

(5) Disposal of HIV-related information: Establishment should have standard operating procedures in place regarding disposal of physical and electronic records or files containing HIV-related information of protected persons.

(6) Accountability and liability of security of HIV-related information should be with Data Management Committees or the heads of concerned establishment. For additional information, Ministry of Health and Family Welfare (National AIDS Control Organisation's) guidelines and official website may be referred to from time to time.

(iii) GRIEVANCE REDRESSAL MECHANISM

The Company appointed Complaints Officer / Grievance Redressal Officer who can be contacted, irrespective of hierarchy or any other restrictions, to raise any issue, complaint or grievance related to non-adherence or discrimination faced with respect to HIV or related aspects by any employee, former employee or a candidate who has applied for a position.

Grievance Redressal Officer (Complaints Officer): Duties, Power and Responsibilities –

(1) Acceptance of complaints – Complaints Officer has to register the complaint. The complaint has to be made **within three months** from the date that the person making the complaint became aware of the alleged violation of the policy in the Company. If the Complaints Officer is satisfied of circumstances that prevented the complainant from making the complaint within the stipulated period, extension of another three months should be granted.

(2) Assistance in filing complaint – Every complaint should be made to the Complaints Officer in writing in the Form annexed at **Appendix A**. Where a complaint cannot be made in writing the

Complaints Officer shall render all reasonable assistance to the complainant to file the complaint in writing.

(3) Acknowledgement and registration of complaints – The Complaints Officer, on receipt of a complaint, should provide an acknowledgment to the complainant and record the complaint in electronic form. The time of the complaint and the action taken on the complaint should also be recorded. Every complaint should be numbered sequentially. The Complaints Officer should act in an objective and independent manner while deciding complaints made under the Act.

(4) Timeline for decision making – The Complaints Officer should arrive at a decision of the complaint promptly and in any case **within seven working days**.

(5) Decision making powers – The Complaints Officer, if satisfied that a violation of the Act has taken place as alleged in the complaint, should firstly, direct the Company/concerned person/department in the Company to take measures to rectify the violation; secondly, counsel the person who has committed the violation and require such person to undergo training in relation to HIV and AIDS, provisions of the Act, rules, guidelines and aspects of stigma and discrimination.

Additionally, social service should be done for a fixed period, which should include working with a non-governmental organization (NGO) working on HIV and AIDS. For this, assistance from respective District AIDS Prevention and Control Unit or State AIDS Control Society should be undertaken. Upon subsequent violation of the Act by the same person, the Complaints Officer may recommend the Company to take disciplinary action in accordance with the law.

(6) Informing the complainant – The Complaints Officer should inform the complainant of the action taken in relation to the complaint and of the complainant 's right to approach the Ombudsman or to any other appropriate legal recourse in case the complainant is dissatisfied with the action taken.

(7) Reporting Mechanism – The Complaints Officer shall ensure that the complaint, its nature and number and the action taken are reported to the appropriate authority under the Central Government (Deputy Director General, Information Education and Communication or Director Administration, National AIDS Control Organisation) **every six months**. In case there are no complaints in last six months, submission of a **Nil report is not a compulsion**.

(8) Confidentiality – The Complaints Officer if requested by the complainant should ensure the protection of the identity of the protected person in the following manner, namely: -

(a) the complaints officer should file one copy of the document bearing the full name, identity and identifying details of such protected person which shall be kept in a sealed cover and in safe custody with the complaints officer.

(b) the complaints officer shall provide pseudonyms to protected person (Employee) involved in complaints before them.

(c) the identity and identifying details of the complainant should not be revealed by any person or their representatives including assistants and staff.

(9) Data Management – The Complaints Officer shall comply with the data protection measures in accordance with the section 11 of the HIV and AIDS (Prevention and Control) Act, 2017 and Guidelines on Confidentiality of Data of protected persons there under.

Details of the Complaints Officer

Name & Designation – Mr. Amit Mishra (CHRO)

Email ID - Amit.Mishra@viraj.com

Contact Number: 7507774832

Regular trainings and awareness sessions should be conducted to spread awareness about the Act and the Company policy with an intent to –

- (1) Prevent HIV transmission and to provide care and support to HIV infected workforce.
- (2) Awareness generation or training on basics of HIV, routes of transmission, undoing myths and misconceptions, behaviour change, Universal Precaution, Post Exposure Prophylaxis.
- (3) Integration of HIV component at trainings of human resource department, welfare measures, corporate social responsibility etc.
- (4) Zero-discrimination policy on the basis of HIV status at all locations, both physical and virtual. Adapt flexibility and provide reasonable accommodation for People Living with HIV.
- (5) Grievance redressal mechanism process to be shared and made accessible to all employees.
- (6) Undertake epidemiological surveillance at the Company to gather data or information for taking informed policy and programmatic decisions.

AWARENESS GENERATION – the Company shall on an annual basis, organise workshops and awareness programmes for sensitizing its employees with the provisions of the Act and Policy. Sensitization to also include functioning of grievance redressal mechanism including who can file a complaint, on what basis complaint can be filed, how the complaint can be filed etc. Contact details of the Complaints Officer to be made available to the people at the establishment.

Roles/Responsibilities/Duties of Employees of the Company:

- (1) As a co-worker it is the responsibility of the person/employee of the Company not to discriminate against their colleagues on the basis of HIV status.
- (2) Employees also have to ensure that the HIV status if known to them is not disclosed to anyone without informed consent of the HIV positive person.
- (3) If they are witness to any form of discrimination against person on the basis of HIV status, they should discourage such behavior and advise the person to file a complaint with Complaints Officer at the organisation level or at the Ombudsman at the State level.
- (4) Employees cannot disclose the personal details including name and address of the person living with HIV to anyone including the employer, family members, other employees or media agencies.

Roles/rights/duties of person infected with HIV –

- (1) Person infected with HIV, if discriminated, should file a complaint either with Complaints Officer at the Company or with the Ombudsman at State or District level.
- (2) Every complaint should be made in writing in the Form set for the purpose. Complaint can also be made via post, telephonically, or in electronic form, but at the end it has to be translated to the Complaint Form. Where a complaint cannot be made in writing, it is the responsibility of the Complaints Officer to render all reasonable assistance to the complainant to file the complaint in writing.

(3) The complaints should be made within three months from the date the complainant became aware of the alleged violation of the Act in the establishment. If the complaints officer is satisfied that circumstances prevented the complainant from making the complaint within the stipulated period, then the time limit to make the complaint may be extended by a further period of three months.

(4) the Person infected with HIV has a duty and responsibility to prevent transmission of HIV. Every person, who is HIV positive and has been counselled in accordance with the guidelines issued or is aware of the nature of HIV and its transmission, shall take all reasonable precautions to prevent the transmission of HIV to other persons. The person should adopt strategies for the reduction of risk or informing in advance his HIV status before any sexual contact with any person or with whom needles are shared with.

Conclusion: This policy is subject to regular monitoring and evaluation to ensure its effectiveness and alignment with the prevailing laws, company's commitment to HIV/AIDS non-discrimination, awareness, prevention, and health support.

This Policy was approved by the Board of Directors at its meeting held on 21/03/2026.

APPENDIX A

Form for making Complaint to Complaints Officer

1. Date of Incident
2. Place of Incident
3. Description of incident
4. Person/ institution responsible for the incident

Signature of Complainant

Name:

Date:

Mobile No./email/Fax/Address:

For Official Use only:

Complaint Number:

*Where the complaint is received orally or telephonically and reduced to writing by the Complaints Officer, the Complaints Officer shall sign and date the Form.