

Anti - Harassment Policy

Document Version No.: 1.0

Release Date: 2nd May 2022

REVISION HISTORY

Date	Version No.	Prepared By	Reviewed By	Approved By	Summary of Changes
2/5/2022	1.0	Antara Chatterjee	Malini Moorthy	Vishwanath Joshi - CPO	Introduced policy

TABLE OF CONTENTS

Contents

1.0	POLICY.....	4
2.0	SCOPE	4
3.0	PURPOSE.....	4
4.0	WORKPLACE HARASSMENT.....	5
4.1	POLICY AGAINST HARASSMENT.....	5
4.2	SEXUAL HARASSMENT	6
4.3	REPORTING HARASSMENT	6
4.4	RESOLUTION PROCEDURE.....	7
4.5	MAINTAINING A WRITTEN RECORD OF COMPLAINTS	7
4.6	PROTECTION AGAINST RETALIATION	7
4.7	AGGREIVED PERSON/WITNESS/SUPPORTERS NOT TO BE PENALIZED.....	8
4.8	INQUIRY PROCEDURE	8
5.0	POLICY REVIEW	8

1.0 POLICY

Hexaware Technologies Limited is an equal opportunity employer and is committed to providing a workplace that is free from all forms of harassment. Employees are assured a workplace free of harassment irrespective of their gender, race, social class, caste, creed, and religion, place of origin, sexual orientation, disability or economic status with a zero-tolerance policy to any kind of workplace harassment.

Hexaware employees have the right to work in an environment free from any form of discrimination and conduct which can be considered as harassing, coercive, or disruptive as defined in this policy. This policy therefore has been formulated to assist in the creation of such an environment and assist individuals who believe they have been subjected to any kind of harassment to seek support and remedial action.

2.0 SCOPE

The Policy will apply to all employees, regardless of their position, including interns & contractors. The policy will also cover anyone connected with Hexaware's business including applicants for employment, trainees, retainers, consultants, contractors, vendors, visitors or customers on the premises. It covers all types of harassment including, harassment of women by men, of men by women or between the same sexes.

Harassment is unlawful irrespective of who is involved in the behavior. Anyone has the right to make a complaint if he/she believes that someone's behavior at work is harassing them. The policy is not restricted to Hexaware premises only but would remain applicable to all persons described above wherever such persons interact with each other while on work related to the company, including for example, in company vehicles, third party premises, off site meetings, onsite visits & deputation and office parties at external venues.

Note:

- ❖ All persons covered by the policy are therefore urged to familiarize themselves with this policy. Ignorance of any aspect of this policy will not be a defense during an enquiry pertaining to this matter.

- ❖ Prevention of Sexual Harassment Policy (Hex 5732) will supersede this policy in all the matters of sexual harassment of employees in India.

3.0 PURPOSE

The purpose of the policy is to provide a cordial work environment with a zero-tolerance policy to any kind of harassment at workplace.

4.0 WORKPLACE HARASSMENT

Each Hexaware employee has the responsibility of maintaining a workplace that respects our differences, values, and diversity. At Hexaware, we expect each employee to respect every other employee. Derogatory comments about an individual's background or harassment of any kind will not be tolerated. In order to create awareness and a more respectful work environment for employees, a Harassment Prevention training module is assigned for every employee to take within the first few weeks of their joining.

4.1 POLICY AGAINST HARASSMENT

Harassment consists of unwelcome conduct, whether verbal, physical, or visual, that is based upon a person's protected status, such as race, color, national origin, ancestry, creed, religion, age, marital status, sex, sexual orientation, disability, military service, Vietnam-era, special-disabled veteran status, or any other class protected by applicable federal, state, or local laws.

Harassment in any manner or form is strictly prohibited. Harassment may take many forms, but the most common forms include:

- a) Verbal harassment –such as jokes, epithets, slurs, negative stereotyping, and unwelcome remarks about an individual's body, color, physical characteristics, or appearance, questions about a person's sexual practices, or gossiping about sexual relations, whether directly or indirectly through the overhearing of a conversation.
- b) Physical harassment –such as physical interference with normal work, impeding or blocking movement, assault, unwelcome physical contact, leering at a person's body, and threatening, intimidating or hostile acts.
- c) Visual harassment –such as offensive or obscene photographs, calendars, posters, cards, cartoons, e-mails, drawings and gestures, display of sexually suggestive or lewd objects, unwelcome notes or letters, and any other written or graphic material that denigrates or shows hostility or aversion towards an individual, because of a protected characteristic, that is placed on walls, bulletin boards, or elsewhere on the employer's premises/property including desktops, laptops and cell phones, or circulated in the workplace.

Hexaware prohibits any and all conduct that may reasonably be interpreted as harassment as defined above whether or not such conduct is pervasive enough or severe enough to meet the technical legal requirements of harassment. Hexaware will not tolerate harassing conduct that affects recruitment, tangible job benefits, which interferes unreasonably with an individual's work performance, or that creates an intimidating, hostile, or offensive working environment.

4.2 SEXUAL HARASSMENT

Sexual harassment is a form of prohibited harassment. There are two distinct categories of sexual harassment:

- a) **Quid Pro Quo** –When an individual’s submission to or rejection of unwelcome sexual conduct is used as a basis for employment decisions affecting that individual, including the granting of employment benefits.
- b) **Hostile Environment** –When unwelcome sexual conduct unreasonably interferes with an individual’s job performance or creates an intimidating, hostile, or offensive working environment, even if it does not lead to tangible or economic job consequences.

Sexual harassment includes harassment of women by men, of men by women, and same-sex harassment. Sexual harassment is unlawful whether it involves co-worker harassment, harassment by a supervisor or manager, or by persons doing business with or for the Company. Examples of sexual harassment include, but are not limited to: unwanted sexual advances, demands for sexual favors in exchange for favorable treatment or continued employment, creating explicit sexual propositions; physical, verbal or non-verbal conduct such as slurs, innuendoes, threats, derogatory or suggestive comments; unwelcome “practical jokes,” jokes about gender-specific traits, sexually oriented kidding, teasing, explicit sexual propositions, leering, whistling, obscene language or gestures; displaying the workplace of sexually suggestive objects or pictures, physical contact such as patting, pinching, brushing, touching, or other similar conduct against another’s body.

4.3 REPORTING HARASSMENT

Any employee or applicant for employment who feels harassed, or knows of or suspects the occurrence of harassment, is responsible for promptly informing their supervisor or HR location managers of the facts regarding such harassment so that the Human Resources Department may conduct an investigation. An employee or applicant for employment who reports an occurrence of harassment will be informed that an investigation will be conducted and that appropriate corrective action, if warranted, will be taken by management. Complaints must be made in writing so as to enable a formal investigation and enquiry into the matter. The employee will share details of the incident/s including date, time, witnesses if any and description/nature of incident/s.

Although a delay in reporting an incident of harassment will not preclude remedial action, prompt reporting is encouraged to better protect the individual who is the object of harassment and other Hexaware employees. All company employees are responsible to help ensure that we avoid harassment. If you feel that you have experienced or witnessed harassment, notify your supervisor immediately. If you believe it would be inappropriate to discuss the matter with your supervisor, you may report it directly to the head of your department or to Human Resources as mentioned above. The Company forbids retaliation against anyone who reports unlawful harassment.

Alternatively, US, Canada, Mexico employees can use toll-free hotline service provided by Lighthouse in cases where anonymity is desired:

- ❖ Telephone: English speaking USA and Canada: 844-520-0004
Spanish speaking USA and Canada: 800-216-1288
French speaking Canada: 855-725-0002
- ❖ Website: www.lighthouse-services.com/hexaware
- ❖ E-mail: reports@lighthouse-services.com (must include company name with report)
- ❖ Fax:(215) 689-3885 (must include company name with report)

In India, any aggrieved employee who is the recipient of any sexual harassment at workplace as described by this policy or has knowledge of the occurrence of such sexual harassment to any employee, is expected to report the same (“Complaint”) at the earliest. For more details, please refer to “Prevention of Sexual Harassment at Workplace (POSH)” Policy (Hex 5732) available on station.

4.4 RESOLUTION PROCEDURE

On a written request/complaint from the aggrieved person, resolution may be initiated through conciliation/mediation. If conciliation is successful between both parties, the settlement must be noted in writing. If settlement is not arrived at through conciliation, the HR will proceed with an inquiry. The inquiry will be done promptly, thoroughly and with utmost confidentiality as practically possible. The inquiry process and the report should be documented in writing. Upon completion of the investigation, the investigator will report to the Chief People Officer or, if appropriate, to the Board of Directors who will review the investigation, make findings and decide upon the appropriate action to be taken.

Those found guilty will be subjected to appropriate disciplinary action. Disciplinary actions for cases of harassment may range from oral/written warnings, extension of probation, demotion, withholding of increment/promotion, withholding of monetary compensation as appropriate, community service, counselling sessions, termination from the services of the organization.

4.5 MAINTAINING A WRITTEN RECORD OF COMPLAINTS

Hexaware shall maintain a complete written record of each complaint, how it was investigated and resolved. Written records shall be maintained in a confidential manner, to the extent practical and appropriate, in the Hexaware corporate office.

4.6 PROTECTION AGAINST RETALIATION

Retaliation is a serious violation of this policy and any person found to have retaliated against an individual for reporting harassment will be subject to appropriate disciplinary procedures. Hexaware forbids any form of retaliation against anyone who has reported a suspected episode of harassment or has

cooperated in any investigation involving a reported case. If anyone feels that he/she is experiencing retaliation of the nature of intimidation, pressure to withdraw the case or threats for reporting, testifying or otherwise participating in the proceedings, should report the matter to the Manager/HR immediately. As with complaints of harassment, this too will be treated as misconduct and Hexaware will take appropriate action to prevent/rectify the retaliation. Any form of retaliation will be treated as seriously as an alleged case of harassment and the same procedure will apply even if the original complaint is not proven.

4.7 AGGREIVED PERSON/WITNESS/SUPPORTERS NOT TO BE PENALIZED

If a complaint of harassment is dismissed by the company under this Policy, no action whatsoever (including the recovery of any costs involved in investigating/enquiring into the complaint) may be taken in regard to the same against the aggrieved person/witnesses/supporters.

4.8 INQUIRY PROCEDURE

It shall be the duty of all employees to ensure that all complaints lodged under this policy are kept confidential. All incidents/grievances reported will be treated seriously and sensitively with utmost confidentiality and privacy of all parties concerned as is practically possible.

5.0 POLICY REVIEW

The policy will be reviewed at least annually and / or as & when need arises.