

Anti - Harassment Policy

**Global Policy for Prevention of Workplace
Harassment, Discrimination & Bullying**

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REVISION HISTORY

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1-Mar-24	1.1	Karthick Balasubramanian HR Compliance	Malini Moorthy Sr. Vice President Jacob P.U Vice President Hariharan Srinivasan Sr. Vice President HR Augustine K Sr. Vice President HR Sanhita Ganguly Ass. Vice President HR	Nita Nambiar Chief People Officer	Updated sec 4.1 on types of harassment
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Anti - Harassment Policy

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 & discrimination. Employees are assured a workplace free of harassment irrespective of their race, color, religion, caste, creed, disability, national origin, genetic information, gender (including gender identity and expression), marital status, citizenship status, age, social class, economic status, political ideology with a zero-tolerance policy to any kind of workplace discrimination.

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/discrimination to seek support and remedial action.

Hexaware strives to create and maintain a work environment in which people are treated with dignity, decency, and respect. The environment of the company should be characterized by mutual trust and the absence of intimidation, oppression, and exploitation. Hexaware will not tolerate unlawful discrimination or harassment of any kind. Through enforcement of this policy and by education of employees, Hexaware will seek to prevent, correct, and discipline behavior that violates this policy. Managers and supervisors who knowingly allow or tolerate discrimination, harassment, or retaliation, including the failure to immediately report such misconduct to human resources (HR), are in violation of this policy and subject to discipline.

2.0 AUDIENCE & SCOPE

The Policy will apply to all employees, regardless of their position, including interns, trainees & 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. This policy is applicable to Hexaware Technologies Limited (including subsidiaries, acquired entities, and affiliate companies). This is a gender-neutral policy aimed to protect the interests of everyone.

Harassment is unlawful irrespective of who is involved in the behavior. It is defined as an unwanted conduct that has the purpose of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. Anyone has the right to make a complaint if an employee 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 (Extended workplace) and Client Location.

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Note:

- ❖ Everyone covered under 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 form of harassment at the workplace.

4.0 WORKPLACE HARASSMENT

Each Hexaware employee has the responsibility of maintaining a workplace that respects our differences, values, and diversity. Harassment includes, but is not limited to: verbal language that reinforces social structures of domination related to gender identity and expression, sexual orientation, disabilities, neurodiversity, physical appearance, body size, ethnicity, nationality, race, age, religion, or other protected category; sexual imagery in public spaces; deliberate intimidation; stalking; following; harassing photography or recording; sustained disruption of talks or other events; offensive verbal language; inappropriate physical contact; and unwelcome sexual attention. Employees asked to stop any harassing behavior are expected to comply immediately. 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.

Hexaware prohibits harassment of any kind, including sexual harassment, and will take appropriate and immediate action in response to complaints or knowledge of violations of this policy. For purposes of this policy, harassment is any verbal or physical conduct designed to threaten, intimidate or coerce an employee, co-worker, or any person working for or on behalf of Hexaware.

The following examples of harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

- Verbal harassment includes comments that are offensive or unwelcome regarding a person's national origin, race, color, religion, age, sex, sexual orientation, pregnancy, appearance, disability, gender identity or expression, marital status or other protected status, including epithets, slurs and negative stereotyping.
- Nonverbal harassment includes distribution, display or discussion of any written or graphic material that ridicules, denigrates, insults, belittles or shows hostility, aversion or disrespect toward an individual or group because of national origin, race, color, religion, age, gender, sexual orientation, pregnancy, Childbirth, appearance, disability, sexual identity, marital status or other protected status.

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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, gender, 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, pregnancy, childbirth questions about a person's sexual practices, or gossiping about sexual relations whether directly or indirectly through the overhearing of a conversation.
- b) Workplace harassment - covers a broad spectrum of unwelcome behaviors, actions, or communication, within the work environment. Harassment in the workplace is not limited to a single type of behavior but rather encompasses a spectrum of actions that undermine a healthy and respectful work environment. Workplace Harassment includes verbally abusive behaviors. Yelling, insults, ridicule, name calling, and/or jokes/ remarks that demean, intimidate, or offend. Workplace pranks, vandalism, bullying and/or hazing.
- c) Managerial harassment - is a behavior such as taking credit for someone's achievement, making impossible demands, imposing unreasonable deadlines on a particular employee, constantly requiring an employee to perform demeaning tasks that are outside of their job scope or persistently opposing everything someone says may not seem like harassment.
- d) Physical harassment –such as physical interference with normal work, impeding or blocking movement, assault, unwelcome physical contact, leering at a person's body, groping and threatening, intimidating or hostile acts.
- e) 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.
- f) Cyberbullying/Digital Harassment – Hexaware recognizes that harassment in the digital realm, commonly known as cyberbullying, is a serious issue and will be treated with the same severity as traditional forms of harassment. This includes any use of electronic communication to bully, intimidate, or harass an individual, whether through social media, email, instant messaging, or any other digital platform. Such behavior, which may include sending threatening messages,

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Sharing derogatory or offensive content, or other forms of online harassment, undermines our values of respect and dignity in the workplace. Hexaware is committed to providing a safe and respectful work environment for all employees, and as such, will not tolerate any form of cyberbullying. Any incidents reported will be thoroughly investigated and appropriate disciplinary actions will be taken against those found responsible. We encourage all employees to be responsible digital citizens and to report any instances of cyberbullying they encounter.

Hexaware prohibits all conduct that may reasonably be interpreted as harassment as defined above whether 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. Sexual harassment is defined as any "unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, when, submission to or rejection of such conduct is used as the basis for employment decisions or such conduct has the purpose or effect of creating an intimidating, hostile or offensive working environment."

Sexual harassment occurs when unsolicited and unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature:

- Is made explicitly or implicitly a term or condition of employment.
- Is used as a basis for an employment decision.
- Unreasonably interferes with an employee's work performance or creates an intimidating, hostile or otherwise offensive environment.

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 any individual by another and same-sex harassment regardless of gender or sexual orientation. 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

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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 CONSENSUAL SEXUAL OR ROMANTIC RELATIONSHIPS

Hexaware strongly discourages romantic or sexual relationships between a manager or other supervisory employee and an employee who reports directly or indirectly to that person, because such relationships tend to create compromising conflicts of interest or the appearance of such conflicts. In addition, such a relationship may give rise to the perception by others that there is favoritism or bias in employment decisions affecting the staff employee. Moreover, given the uneven balance of power within such relationships, consent by the staff member is suspect and may be viewed by others, or later date by the staff member, as having been given as the result of coercion or intimidation. The atmosphere created by such appearances of bias, favoritism, intimidation, coercion or exploitation undermines the spirit of trust and mutual respect that is essential to a healthy work environment. If there is such a relationship, the parties need to be aware that one or both may be moved to a different department or other actions may be taken.

If any employee enters into a consensual relationship that is romantic or sexual in nature with an employee who reports directly or indirectly to that employee, or if one of the parties is in a supervisory capacity in the same department in which the other party works, the parties must notify the HR head or other appropriate corporate officer. Because of potential issues regarding quid pro quo harassment, Hexaware has made reporting mandatory. This requirement does not apply to employees who do not work in the same department or to parties where neither one supervises nor otherwise manages responsibilities over the other.

Once the relationship is made known to Hexaware, the company will review the situation with the HR team in light of all the facts (reporting relationship between the parties, effect on co-workers, job titles of the parties, etc.) and will determine whether one or both parties need to be moved to another job or department. If it is determined that one party must be moved, and there are jobs in other departments available for both, the parties may decide who will be the one to apply for a new position. If the parties cannot amicably come to a decision, or the party is not chosen for the position to which he or she applied, the CPO and senior management will decide which party will be moved. That decision will be based on which move will be least disruptive to the organization as a whole. If no other jobs are available for either party, the parties will be given the option of terminating their relationship or resigning.

Note: Below link will have the detailed India policy of PSH as per the PSH Act is a legislation enacted by the Government of India in 2013 to address the issue of sexual harassment faced by women in the workplace. The Act aims to create a safe and conducive work environment for women and provide protection against sexual harassment.

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For India associates can raise a PSH complaint directly to Complaintscommittee@hexaware.com

[PSH- Policy](#)

Please refer to the below Employee Handbook for US.

 [Handbook for US](#)

 [Handbook for Mexico](#)

MICROAGGRESSIONS

Workplace harassment may also consist of offensive conduct based on one or more of the protected groups above that is so severe or pervasive that it creates a hostile or offensive work environment or results in an adverse employment decision.

A hostile work environment is one where the words and actions of a supervisor, manager or coworker negatively or severely impact another employee's ability to complete their work. Any employee can be responsible for creating a hostile work environment. a statement, action, or incident regarded as an instance of indirect, subtle, or unintentional discrimination against members of marginalized group such as a racial or ethnic minority.

Microaggression is a subtle behavior – verbal or non-verbal, conscious or unconscious – directed at a member of a marginalized group that has a derogatory, harmful effect. Unlike some other forms of prejudice and discrimination, the perpetrator of a microaggression may not even be aware that their behavior is hurtful. While microaggressions are sometimes conscious and intentional, on many occasions microaggressions may reflect the perpetrator's implicit biases about marginalized group members. There are 3 kinds of micro-aggressions.

- A) Microassaults – Microassaults are the most overt microaggressions. With microassaults, the person committing the microaggression acted intentionally and knew their behavior might be hurtful. They are the explicit use of insults, slurs or other statements, behavior or imagery that convey exclusion based on a person's characteristics.
- B) Microinsults – Microinsults are more subtle than microassaults, but nevertheless have harmful effects on marginalized group members. They are slight, insensitive comments or other demeaning verbal/ non-verbal conduct that carry a hidden insulting message towards the recipient.

Microinvalidations - Microinvalidations are comments and behaviors that deny the experiences of marginalized group members. They are statements that exclude or negate the experience of a person, resulting in the negation of their identity or heritage.

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4.4 COMPLAINT PROCEDURE

1. Complaints can be raised through email with immediate reporting manager / HRBP and register by written complaint with HR Compliance Team (HRCompliance@hexaware.com).

Although a delay in reporting an incident will not preclude remedial action, prompt reporting is encouraged to better protect the individual who is subject to harassment and other Hexaware employees.

2. Upon receiving a complaint from the complainant, the supervisor /manager/ HRBP will share the complaint with HR Compliance Team.
3. The HR Compliance team will initiate an investigation to determine whether there is a reasonable basis for believing that the alleged violation of this policy occurred.
4. If necessary, the complainant and the respondent will be separated during investigation, either through internal transfer or administrative leave.
5. During the investigation, the HR Compliance Team, together with committee or other HRBP Management employees, will interview the complainant, the respondent and any witnesses to determine whether the alleged conduct occurred.
6. Upon conclusion of an investigation, the HR Compliance team or other person conducting the investigation will submit a written report of his or her findings to the HR Compliance Lead. If it is determined that a violation of this policy has occurred, the HR Compliance Lead will recommend appropriate disciplinary action. The appropriate action will depend on the following factors:
 - a) the severity, frequency and pervasiveness of the conduct.
 - b) prior complaints made by the complainant.
 - c) prior complaints made against the respondent; and
 - d) the quality of the evidence (e.g., firsthand knowledge, credible corroboration).

The consequence will be determined based on the evidence /witness, investigation findings and the outcome of the investigation.

7. Senior management will review the investigative report and any statements submitted by the complainant or respondent, discuss the results of the investigation with the HR Compliance Team and other management staff as appropriate, and approve the consequences.
8. Once a final decision is made by senior management, the HR Compliance Team will meet with the complainant and the respondent separately. The HR Compliance Team will notify the complainant on the closure confirmation. If disciplinary action is to be taken, the respondent will be informed of the nature of the discipline and how it will be executed.

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Geo's	Telephone	Website	E-mail	Fax
US, Canada, Mexico	English speaking USA and Canada: 844-520-0004 Spanish speaking USA and Canada: 800-216-1288 French speaking Canada: 855-725-0002	www.lighthouse-services.com/hexaware	reports@lighthouse-services.com (must include company name with report)	(215) 689-3885 (must include company name with report)
India	-	-	Whistleblower - whistleblower@hexaware.com PSH - Complaintscommittee@hexaware.com HR Compliance - HRCompliance@hexaware.com	-
UK, EU, APAC	-	-	ukcomplaintscell@hexaware.com europecomplaintscell@hexaware.com	-

In India any employee who experiences or become aware of any incident of sexual harassment at the workplace, as outlined in this policy is required to promptly report it. For more details, please refer to “Prevention of Sexual Harassment at Workplace (PSH)” Policy (Hex 5732) available on StationH.

4.4.1 INVESTIGATING COMMITTEE ASSURANCES

a) Confidentiality

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. Information will be disclosed on a need-to-know basis, only to the extent needed to conduct a proper investigation. However, despite best efforts, it may not always be possible to keep anonymity of parties or witnesses throughout the investigation in all cases. In addition, sharing or discussion about the complaint will be treated as policy violation and appropriate disciplinary action will be taken against the individual as deemed to fit.

b) Fairness and Without Bias

There is no favoritism or personal preference for anyone while investigating a case of Harassment/Discrimination/Bullying. IC members are trained to remain neutral and not allow individual opinions to replace facts and records. The investigation and decision-making procedures are just, reasonable, and impartial to all parties involved.

c) Non-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

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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.

4.5 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 COMPLAINTS MADE WITH A MALICIOUS INTENT

The policy has been developed as a tool to ensure that in the interest of justice and fair play, our employees have a forum and procedures to report instances of workplace harassment. However, if it is revealed that the complaint was made with a malicious intent or knowing it to be false and with the motive of maligning the concerned individual / tarnishing their image in the company and to settle personal/professional score or where any party has produced false or misleading documents as evidence, disciplinary action will be taken against the person. This will also apply to a person who appears as a witness with a malicious intent or gives false testimony. However, a mere inability to substantiate a complaint or provide adequate evidence will not attract any disciplinary action under this clause. This disciplinary action could also include termination of employment.

4.7 AGGRIEVED PERSON/WITNESS/SUPPORTERS NOT TO BE PENALIZED

If a complaint of harassment is dismissed by the company under this Policy due to insufficient evidence and witnesses or with the benefit of doubt, no action whatsoever (including the recovery of any costs involved in investigating/enquiring into the complaint) may not be taken in this regard and the same against the aggrieved person/witnesses/supporters.

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ALTERNATE LEGAL REMEDIES

Nothing in this policy may prevent the complainant or respondent from pursuing formal legal remedies or resolution through the court of law. If the Aggrieved Person or the Respondent is dissatisfied with the actions taken by the Employer or the Compliance Committee for the resolution of a complaint, they can file an appeal to the local authorities in accordance with applicable local law.

5.0 POLICY REVIEW

The policy will be reviewed at least annually and / or as & when need arises. Hexaware reserves the right to modify and amend the provisions of this policy to comply with the applicable legal requirements.