

Human Rights Policy

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1. INTRODUCTION

This document specifies the ‘Human Rights Policy’ of Tech Mahindra and its subsidiaries (herein after referred to as “Tech Mahindra”/“Company”). Respect for Human Rights is a fundamental value of Tech Mahindra Ltd. We strive to respect and promote human rights across all our global sites, in accordance with the UN Guiding Principles on Business and Human Rights in our relationships with our employees and suppliers. Our aim is to help increase the enjoyment of human rights within the communities in which we operate.

We use due diligence as a means to identify and prevent human rights risks to people in our business and value chain. Where we have identified adverse human rights impacts resulting from or caused by our business activities, we are committed to provide for or cooperate in, their fair and equitable remediation. We seek to promote access to remediation where we are linked to or involved in those adverse impacts through our relationships with third parties.

Tech Mahindra Ltd. Board of Directors, including the Chief Executive Officer, oversees the Human Rights Policy.

2. ACRONYMS

Term/ Acronym	Explanation
POSH	Policy Of Sexual Harassment
WB	Whistle Blower
CEBC	Code Of Ethical Business Conduct
D&I	Diversity & Inclusion
MS	Modern Slavery
HR	Human Resource
RM	Reporting Manager

3. SCOPE

This policy applies to all Associates working for Tech Mahindra Ltd. Across the globe, the entities that we own, the entities in which we hold a majority interest and the facilities that we manage. The Company also expects suppliers to uphold these principles and urges them to adopt similar policies within their own businesses.

4. COMMUNITY AND STAKEHOLDER ENGAGEMENT

We recognize that we are part of the communities in which we operate. We engage with communities on human rights matters that are important to them such as land rights, access to water and health. We also engage with people in those communities, including indigenous peoples as well as other vulnerable and disadvantaged groups. Our aim is to ensure through dialogue that we are listening to, learning from and considering their views as we conduct our business. We believe that local issues are most appropriately addressed at the local level.

Where appropriate, we engage with a wide range of civil society and stakeholders on human rights issues related to our business. This includes issues in our Company, across our value chain and with our various sponsorships, through which we seek to promote respect for human rights.

5. CREATING A FAIR AND EQUITABLE ENVIRONMENT

Our anti-discrimination and anti-harassment policies apply to everyone involved in the operations of the Company, as well as vendors and clients.

Harassment is any form of behavior that is unwelcome, unsolicited, unreciprocated and usually (but not always) repeated. It is the behavior that has the purpose or effect of violating an associate's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment, and in the perception of the recipient of the conduct, it should reasonable be considered as having that purpose or effect.

For harassment to occur there does not have to be an intention to offend or harass. It is the impact of the behavior on the person who is receiving it, together with the nature of behavior, which determines whether it is harassment or not.

Some common examples of harassment are:

- Telling insulting jokes about particular groups or genders.
- Displaying offensive posters or screen savers.
- Making derogatory comments about someone's race or religion.
- Offensive physical contact, derogatory language or intimidating actions.
- Using any kind of abusive language in the workplace.
- Insulting or threatening gestured or language (overt or implied) or continual and unwarranted shouting in the workplace.
- Unjustified and unnecessary comments about an associate's work or capacity for work.
- Openly displayed pictures, posters, graffiti or written materials which might be offensive to some.
- Phone calls or messages on electronic mail/snail mail or computer networks which are threatening, abusive or offensive to associates.
- The exclusion of an associate or group from normal conversations, work assignments, work related social activates and networks in the workplace.

6. ABUSE OF MANAGERIAL AUTHORITY

Abuse of Managerial authority means conduct by a RM in relation to an associate who reports to them or over whom they have supervisory authority and which:

- Intimidates, humiliates or undermines another associate by belittling them, or
- Excessively, destructively or inappropriately criticizing or reprimanding them, or excessively scrutinizing their work, or
- Makes demands that are unreasonable and/or outside that other associate's role; or
- Makes demand to perform an action that is in breach of the principles of any policy of Tech M

7. SEXUAL HARASSMENT:

We are committed to conducting and governing ourselves with ethics, transparency and accountability. We have developed governance structures, practices and procedures that ensure that ethical conduct at all levels is promoted across our value chain.

The forums to deal with issues and concerns raised by our employees are as follows:

- POSH: The disciplinary action is carried out by the concerned HR department and may include transfer, demotion or even termination.
- WB Policy: The Associate/s concerned who is/are found to be non-compliant after the investigation, are liable to face appropriate disciplinary action including termination from the services of the company. *[Read more: [Code of ethical business conduct](#)]*

The Scope of the Policy is restricted to the following for All Associates:

1. Business location of the company
2. Any external location visited by associate due to or during the course of their employment with the company such as business location of the other Companies/entities, guest houses, etc.
3. Any mode of transport provided by the company for undertaking a journey to and from the aforementioned location.

7.1 Preventive Action

Circulation of applicable policies and other information to all associates. All associates are required to undertake the certification on the Policy on Prevention of Sexual Harassment at regular intervals as per local laws.

7.2 Decision and Action

During the pendency of inquiry, on a written request made by the Aggrieved Associate, the Committee, may recommend to the Company to-

- a. Transfer the Aggrieved Associate or the respondent to any other workplace
- b. Grant leave to the aggrieved associate
- c. Grant such other relief to the aggrieved associate as may be prescribed.

Once the investigation is complete, the Committee shall provide a report of findings to the company within 10 days from the date of completion of the inquiry.

The disciplinary action will be carried out by the concerned HR department/head. Such disciplinary actions may even include:

- a. Restore any lost terms, conditions or benefits of employment to the aggrieved associate.
- b. Discipline the respondent. This discipline can include deduction from the salary or wages the amount to be paid to the Aggrieved Associate, demotion, suspension or termination

7.3 Prohibition of Publication or making known Content of complaint or Inquiry:

The content of the complaint made under the Policy, identity and addresses of the Aggrieved Associate, respondent and witness, any information relating to conciliation and inquiry proceedings, recommendations of the Committee and the action taken by the Company shall not be published, communicated or made known to the public, press and media in any manner.

8. DIVERSITY AND INCLUSION- D&I

We value and advance the diversity and inclusion of the people with whom we work. We are committed to equal opportunity and are intolerant of discrimination and harassment. A key function of our corporate governance framework is the identification, management and mitigation of any risks meted out to the associates under the current working environment. The Company is dedicated to creating a fair and transparent work environment with mutual respect for all. We work to maintain workplaces that are free from discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. The basis for recruitment, hiring, placement, development, training, compensation and advancement at the Company is qualifications, performance, skills and experience.

We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is not tolerated in the workplace and in any work-related circumstance outside the workplace.

[Read more: [Equal Employment, Diversity & Inclusion](#)]

9. FREEDOM OF ASSOCIATION AND EMPLOYEE RESOURCE GROUPS

Employee resource groups representing diverse backgrounds, affinities and skills facilitate community participation, networking, cultural enrichment and support, based on gender, affinity, ability and sexual orientation. These groups design programs and initiatives such as, peer-to-peer chat groups, leadership talks, conferences and special events, to ensure assimilation and engagement of the diverse groups and communities within the large compliance workforce.

The CORPORATE OMBUDSMAN is primarily responsible for overseeing and managing compliance issues within the organization. The CORPORATE OMBUDSMAN is in charge of ensuring, that the company and its Associates are complying with internal policies and procedures.

[Read more: [Code of ethical business conduct](#)]

10. MODERN SLAVERY- MS

Tech Mahindra operates within an established and externally benchmarked corporate governance framework that is underpinned by our vision and values. We are committed to exhibit zero tolerance towards all facets of modern slavery, as elaborated under the Modern Slavery Act, 2015.

A key function of our corporate governance framework is the identification, management and mitigation of risks meted out to the associates under the current working environment of Tech Mahindra. We have regular audits within Tech Mahindra, conducted by the internal audit team. These audits aim at improving our understanding of where the risks are greatest and prioritizing our activity accordingly.

In pursuance of this, we publish this statement pursuant to Section 54(1) of the Modern Slavery Act 2015 (the "Act") elucidating the initiatives undertaken to eradicate the slavery and/or human trafficking from our supply chain or in any part of our organization.

[Read more: [Modern Slavery Act](#)]

11. ENABLING A FLEXIBLE WORK CULTURE

We believe that providing a flexible work culture helps us retain talent and keeps our employees motivated and engaged.

Some of the flexible work options that are provided to our employees are:

- Work-from-home option
- Paid maternity leave
- Sabbatical for personal reasons
- Paternity leave
- Adoption leave
- Part-time, flexi-hours and selective telecommuting
- Sabbatical for community service
- Sabbatical for higher education
- Work options from satellite offices

12. PROMOTING EMPLOYEE MORALE, SKILL UPGRADATION AND CAREER DEVELOPMENT

All our employees are covered under competency development programs that are relevant to their role in the organization. Our Competency Development Program brings relevance and flexibility to competency development for a role along multiple competency dimensions. Our continuous education

programs span technology, domain, business, process and behaviour. We also have specialized programs for senior leadership.

We provide training to all employees without differentiating on grounds of gender or physical ability. Our Education Training group offers industry-benchmarked learning programs to ensure talent enablement. ETA has over 2,000 learning offerings and interventions including training on technical, managerial and process skills, industry domain knowledge and leadership skills for employees and our strategic clients.

13. SAFE AND HEALTHY WORKPLACE

Protecting the environment and the health and safety of Associates is of prime importance to the company and the company strives to provide a safe, healthy and hygienic environment to its workforce. The company implements rigorous plans to ensure safety and welfare of Associates and to protect the assets and information from and during a disruption. The company attaches the greatest value to its personnel. It conducts its operations in a safe manner that minimizes adverse environmental impact. It strives to prevent all possible accidents, incidents, injuries and occupational illness.

Company believes in creating awareness among its Associates on work place practices and communicating information, instruction and training programs to all the Associates to enable them to comply with the Environment, health and safety policy of the company.

[Read more: [Code of ethical business conduct](#)]

14. ENVIRONMENT COMPLIANCE

We will minimize the potentially harmful effects of our activities on the environment. We are committed to protect and preserve the environment. We will endeavor to reuse rather than dispose whenever possible. We will also promote recycling and the use of recycled materials

15. WORKPLACE SECURITY

We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

16. HUMAN DIGNITY

We are committed to treating those engaged with our Company with dignity and respect.

17. CHILD LABOUR

We prohibit the hiring of individuals who are under 18 years of age in the company or as part of our support staff.

18. PUBLIC REPORTING

We report to the public on our human rights-related commitments, efforts and statements, consistent with this Human Rights Policy, as part of our Human Rights Report and annual Sustainability Report. This reporting cross-references the UN Guiding Principles Reporting Framework.

19. REFERENCES

- <https://www.techmahindra.com/sites/ResourceCenter/brochures/investors/corporategovernance/Code-Of-Ethical-Business-Conduct.pdf>
- <https://www.techmahindra.com/sites/ResourceCenter/brochures/investors/corporategovernance/Tackling-Modern-Slavery-Statement.pdf>
- <https://www.techmahindra.com/sites/ResourceCenter/brochures/investors/corporategovernance/Diversity-and-Inclusion-Policy.pdf>

20. AMENDMENT TO POLICY

The Company reserves the right to amend this policy at any time. Nothing in this policy says or implies that a contract exists between the Company and its employees or that participation in this program is a guarantee of continued employment with Tech Mahindra Ltd.