

Version Number	1.3
Current Policy Effective Date	15th May 2022
Process Owner	CRO
Applicability	This Policy is applicable to all employees including officers, directors, employees, visitors, suppliers, contract labor, agents, and representatives of Mphasis, and or any third party with whom an employee may have to interact with or in connection with employment in Mphasis. However, women employees in India would be covered under the India POSH policy

Objective:

Mphasis is committed to ensuring a workplace free from sexual harassment and providing a mechanism for redressal of complaints of sexual harassment without fear or threat of reprisals in any form or manner. Mphasis has zero tolerance for sexual harassment. Mphasis is aware that sexual harassment can occur and when reported, it is committed to redress all such cases.

The POSH (Prevention of Sexual Harassment) policy implemented by Mphasis is reformatory in nature and is well aligned with the HR’s Progressive Disciplinary Action Process (PDAP).

Note: This Global POSH Policy applies to all employees except women employees in India (The India POSH policy applies for them). This policy is also applicable to sub-contract workers, vendors, clients, and all stakeholders who engage with Mphasis.

Compliance to Global Laws: Being a company with footprint across the globe, this Policy for Prevention of Sexual Harassment (“the Policy”) will comply with the applicable law requirements of countries in which the Company operates.

Path – *Unifiedaccess>Policy Documents> HR Corner> Corporate policies>POSH*

Scope and Applicability:

This policy applies to all Mphasis employees (except women employees in India) and is drafted to comply with all local laws and regulations for each of Mphasis’ offices across the world. However, if there is an inconsistency or discrepancy between this policy and the local law, the law of the land in which an employee is located is applicable.

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in connection with employment in Mphasis. **However, women employees in India would be covered under the India POSH policy.**

This Policy is applicable to Mphasis Limited and its subsidiary, affiliate and or group companies (“Mphasis”).

Definitions:

1. **Sexual harassment** is generally defined as **unwanted sexual advances, or visual, verbal, or physical conduct of a sexual nature or because of a person’s sex**. This definition includes many forms of offensive behavior and includes gender and sexuality-based harassment -. The following is an indicative list of violations:

- Unwanted sexual advances.
- Making or threatening reprisals after a negative response to sexual advances.
- **Visual conduct:** leering, making sexual gestures, displaying of suggestive objects or pictures, cartoon, or posters of sexual nature.
- **Verbal conduct:** making or using derogatory comments, epithets, slurs, and jokes.
- Physical harassment such as assault, touching, impeding, or blocking movement, or any physical interference with normal work or movement.
- Verbal sexual advances or propositions.
- Verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, suggestive, or obscene letters, notes, or invitations.
- Insults or taunts of a sexual nature.
- Intrusive questions or statements about a person’s private life.
- Inappropriate advances on social networking sites.
- Accessing sexually explicit internet sites which creates hostile work environment.
- Stalking.

Quid Pro Quo – When submission to or rejection of “unwelcome” sexual advances or conduct of sexual nature is used as the basis for employment decisions, it is termed as “Quid Pro Quo”.

Hostile Work Environment - Occurs when the conduct unreasonably interferes with an individual’s work performance or creates an intimidating or offensive working environment.

2. **Workplace** - The workplace in the context of sexual harassment is not restricted to the office premises such as cubicles, conference rooms, lobbies etc. It includes the extended workplace such as food courts cafeterias and other recreational facilities provided by the company, company provided transport and work-related travel, company sponsored Training programs, parties, and other events. Additionally, the workplace includes employee remote workspace and any company provided virtual platforms like Skype, Microsoft teams, Yammer, Webex, Zoom, etc.

3. **Process of addressing complaint:** Complaints received will be dealt in compliance to the local law requirements.

Core Principles of POSH Policy

The Core Values are the guiding principles to be followed by all stakeholders in the implementation of the POSH policy. The acronym (for easy recall) of the POSH Principles is CONCERN. This has been detailed below:

C	•Confidentiality to the extent that is possible pursuant to the local law will be ensured that information related to POSH complaints and disciplinary process is shared with discretion and only on a "need to know " basis.
O	•Objectivity to keep focus on evidence and to be unbiased in the handling of all aspects of an investigation.
N	•Neutrality to treat all the stake holders equally irrespective of age, gender, caste, language, race, region of origin, religion, level in the organization etc.
C	•Closure to provide speedy conclusion to the investigation of cases with appropriate sharing of information with all relevant parties.
E	•Empathy to be sensitive to the experiences of all the stakeholders and ability to understand what the person has gone through.
R	•Responsiveness to treat all cases as important and urgent and commit to resolve every grievance.
N	•Follow Principles of Natural Justice while investigating a grievance.

Employees' Roles & Responsibilities

- Any employee who feels or believes that he or she has been subjected to or has witnessed sexual harassment in the workplace, shall report the same to posh@mphasis.com.
- If complaints of sexual harassment are submitted to or received by colleagues, leaders, managers or the concerned HRBPs; those complaints shall be forwarded immediately to posh@mphasis.com. Maintaining confidentiality of such complaints will be the personal responsibility of the concerned person who has received or submitted a POSH complaint. It is important to emphasize that regardless of the avenue used to report complaints or participate in the process employees will not be retaliated against in any way.

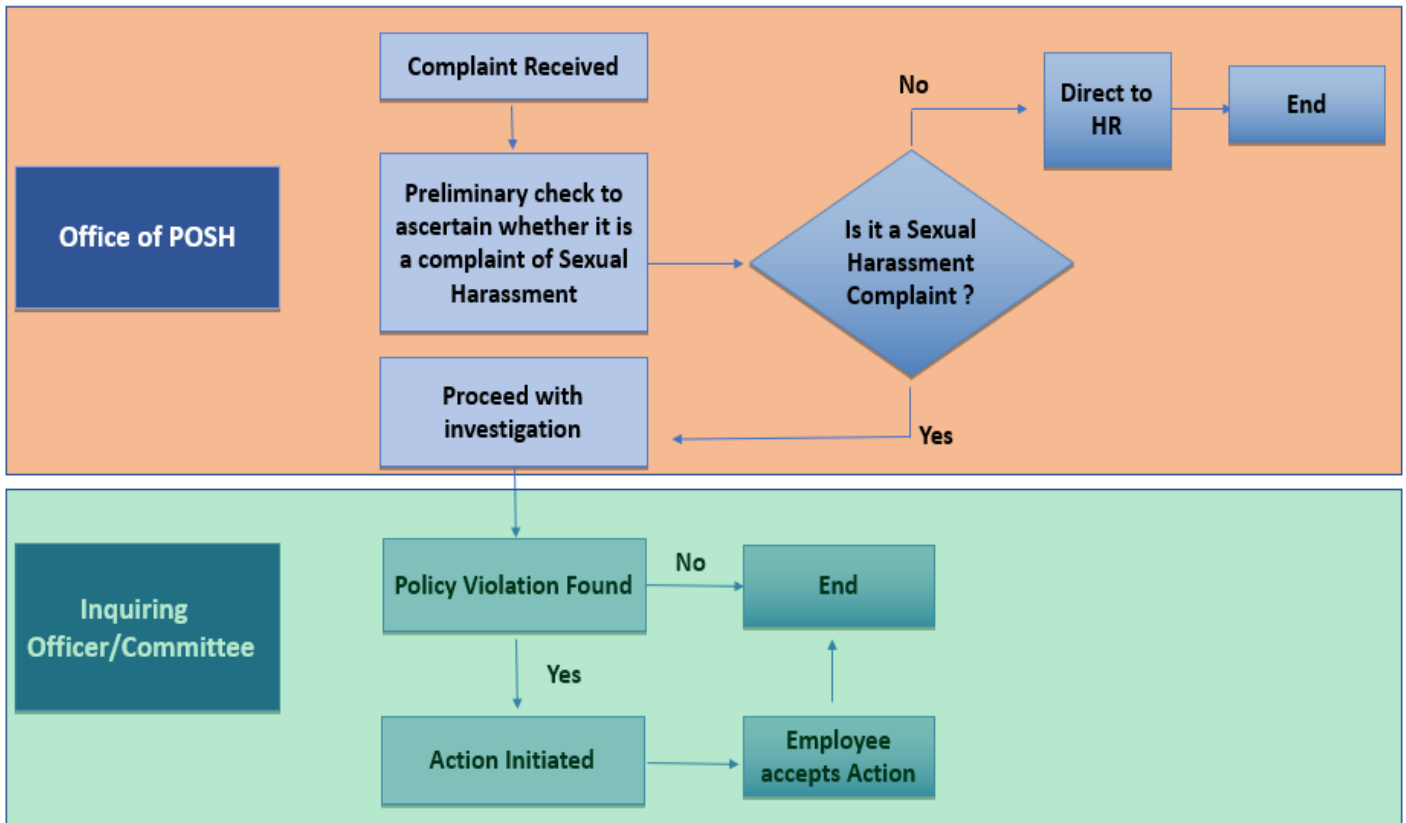
Harassment by Third Parties

Instances of harassment if any, committed by third parties (contractors, visitors, etc.) will also be intimated to POSH office which will take appropriate action either through existing policies or take appropriate legal steps.

Process/Procedure in case of a Complaint of Sexual Harassment

1. An employee who is aggrieved by any conduct / behavior or is witness to or privy to information that he / she believes is an act of sexual harassment is entitled / required to submit a complaint forthwith in writing to posh@mphasis.com or call on +91 9538188838. The said complaint should contain all necessary details/information that the complainant has or is aware of.
2. Upon receipt of the complaint, the POSH Office shall verify the nature of complaint and collect essential details necessary for initiating the inquiry procedures.
3. Such inquiry proceedings will be in compliance with the Principles of Natural Justice and shall be completed as soon as practical and generally no longer than a period of 30 days.
4. Where the Inquiring Officer / Committee determines violation of Mphasis Policies (including this globally applicable POSH policy), necessary actions will be taken on the respondent under Mphasis Code of Business Conduct within 30 days.
5. Adequate steps shall be taken to ensure there is no retaliation against the complainant.
6. Mala fide complaints of sexual harassment amount to misconduct for which disciplinary action could be taken against the complainant. When it is concluded that the allegation is malicious or the complainant or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take actions against the Complainant pursuant to Company policy / practices.
7. Escalation process as applicable in the local jurisdiction will be followed.
8. The contents of the complaint made, the identity and addresses of the complainant, harasser and witnesses, any information relating to the inquiry proceedings and action taken by the employer shall not be published, communicated, or made known to the public, press and media in any manner unless otherwise required by law. Any person contravenes the above, the employer may, as permitted in the jurisdiction where such an act occurred, levy financial penalty as well as take any other disciplinary action as appropriate.

POSH PROCESS FLOW CHART



Policy Revision History

Serial No.	Version No.	Date of Change	Approver	Sections Affected	Changes in Brief
1	1.0	1 st August 2019	Eric Winston	Initial Draft	
2	1.1	17 th February 2020	Eric Winston	Policy revision	Harassment basis 'sexuality' included in the definition of sexual harassment
3	1.2	1 st July 2020	Eric Winston	Policy revision	Inclusion of the definition of Workplace and Extended Workplace
4	1.3	15 th May 2022	Sethu S Raman	Policy revision	Applicability to all, other than women employees in India, Removal of Core Committee, and process revision