

<b>Version Number</b>	1.2
<b>Current Policy Effective Date</b>	01-July-2020
<b>Process Owner</b>	Head, Legal
<b>Applicability</b>	<p>The Policy is applicable to Mphasis Limited and its subsidiary, affiliate and or group companies (“Mphasis”) based out of the all the Countries.</p> <p>The Policy applies to all 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.</p>

## 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. Accordingly, the Company has framed the Policy for the Prevention of Sexual Harassment (“the Policy”) which is outlined in accordance to the applicable law of countries in which the Company operates such as:

1. India - Sexual harassment of women at workplace (Prevention, Prohibition and Redressal) Act, 2013  
**India – POSH Policy and FAQ**  
 Path – *InQmi>HR Corner>Corporate Policies>POSH*
2. United States of America – Title VII of the Civil Rights Act 1964; Equal Employment Opportunity Commission regulations (1980)  
**US – POSH Policy and FAQ**  
 Path – *InQmi>HR Corner>Corporate Policies>POSH*
3. United Kingdom – Equality Act 2010; Employment Rights Act 1996

4. Canada – Canada Labour Code and the Canadian Human Rights Act
5. Australia – Sex Discrimination Act 1984

This policy applies to all Mphasis employees and is drafted to comply with all local laws and regulations for each of Mphasis' offices across the world. If, however, there is an inconsistency or discrepancy between this policy and the local law, the law of the land in which an employee is located applies.

## Scope:

The Policy is applicable to Mphasis Limited and its subsidiary, affiliate and or group companies ("Mphasis"). The Policy applies to all 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.

## Effective Date:

1<sup>st</sup> August 2019

## Policy Description: Definitions

**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 a partial list of violations:

- Unwanted sexual advances
- Requests for or expectation of sexual favors, such as unwanted sexual advances which condition an employment benefit upon an exchange of sexual favors
- 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
- Stalking

2. **The Factfinders** are deemed to be the Inquiring Authority to inquire into all complaints of sexual harassment and to make recommendations for imposition of penalties based on the findings of said inquiries with the guidance of the Core Committee.

3. **The Core - Committee (CC)** is the central committee in Bangalore who is deemed to be the Inquiring Authority along with the Factfinders to inquire into all complaints of sexual harassment and to make, or approve, decisions for imposition of penalties based on the findings of the said inquiries,

4. **The Employer** is the representative from the HR team for the implementation of the recommendations made by the Factfinders and the Core Committee.

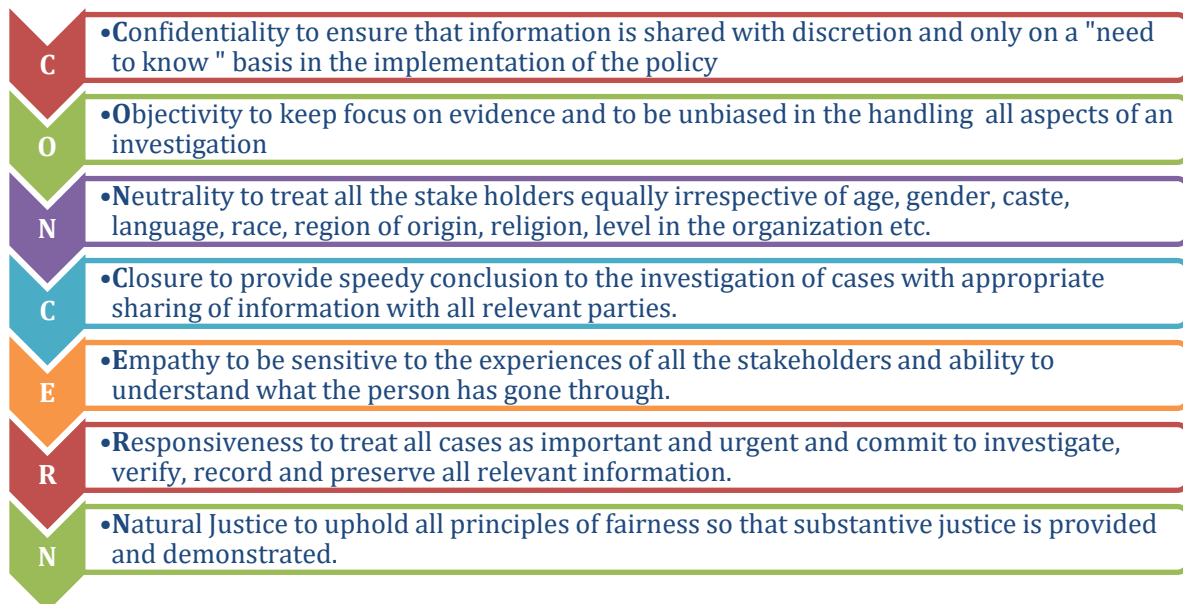
**5. Workplace** - The workplace, in the context of sexual harassment, is not restricted to the office premises such as cubicles, conference rooms, lobbies etc. It includes the extended workplace such as food courts cafeterias and other recreational facilities provided by the Company, Company provided 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.

### **Guidelines**

Mphasis does not tolerate or condone sexual harassment, in or in connection with employment in Mphasis whether committed by 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.

### **Core Values of POSH initiative**

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 values of this initiative is CONCERN. This has been detailed below:



### Employee Initiative

- Any employee who feels or believes that he or she has been subjected to or witnessed sexual harassment in the Company, has an obligation and duty to report the same to [posh@mphasis.com](mailto:posh@mphasis.com)
- If complaints of sexual harassment are submitted to or received by colleagues, leaders, managers or the concerned HRBPs, the said colleagues, leaders, managers or HRBPs have to forward the same immediately to [posh@mphasis.com](mailto:posh@mphasis.com) so that the company also has official knowledge of the complaint and can act accordingly. Failure to report a complaint via [posh@mphasis.com](mailto:posh@mphasis.com) will inhibit Mphasis' ability to investigate the complaint.
- Further, colleagues, leaders, managers or the concerned HRBPs have an obligation and duty to ensure confidentiality, to the extent it is possible, of all complaints.

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

### Third Party Harassment

Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the employer and person in charge will take necessary steps to assist the affected person to report to the concerned authorities.

## 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 the Employee believes amounts to sexual harassment is entitled / required to submit a complaint in writing to [posh@mphasis.com](mailto:posh@mphasis.com). The said complaint should contain all available details/information that the complainant has or is aware of.
2. The Organization will take steps to provide safety and prevent ongoing harassment
3. All complaints must be submitted immediately to ensure Mphasis is able to take necessary and appropriate action with respect to the complaints.
4. The inquiry shall be completed within a period of sixty days.
5. If Mphasis determines a violation of its Policies has occurred, there will be prompt and effective remedial action.
  - First, if necessary, under the circumstances, appropriate action in accordance with the provision of Company's Code of Business Conduct will be taken against the harasser and communicated to the complainant.
  - Second, steps will be taken to prevent further retaliation.
6. Depending upon the urgency of the recommendation related to the circumstances of the complaint, the employer shall implement the recommendation no later than 30 days of receiving the recommendation and send the report of implementation to the Core Committee.
7. Where the Factfinders and Core Committee arrives at a conclusion that the allegation against the harasser is malicious or the complainant or any other person making the complaint has produced any forged or misleading document it may recommend the employer to take action pursuant to Company policy.
8. If the complainant or the accused is not satisfied with the decision taken by the Committee, they can seek recourse outside by approaching the respective authorities provisioned under the law of the respective countries.
9. Malicious, mala fide complaints of sexual harassment amount to misconduct for which disciplinary action could be taken.
10. The contents of the complaint made, the identity and addresses of the complainant, harasser and witnesses, any information relating to the inquiry proceedings, recommendation of the Factfinders and the Core committee 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.
11. If any person contravenes the above, the employer may, if permitted in the jurisdiction where the behavior occurred, levy financial penalty as well as take any other appropriate disciplinary action.
12. The Factfinders shall submit the recommendation as applicable in respect of each complaint, containing the evidence and findings of the inquiry to the Employer for implementation.

## Annexure to the Policy

Annexure A: POSH FAQ

### Policy Revision History

Serial No.	Version No.	Date of Change	LT2 Approver	Sections Affected	Changes in Brief
1	1.0	1 <sup>st</sup> August 2019	Eric Winston	Initial Draft	
2	1.1	17 <sup>th</sup> February 2020	Eric Winston	Policy revision	Harassment basis 'sexuality' included in the definition of sexual harassment
3	1.2	1 <sup>st</sup> July 2020	Eric Winston	Policy revision	Inclusion of the definition of Workplace and Extended Workplace