

## **Human Rights Policy**

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## 1. INTRODUCTION

This document specifies the 'Human Rights Policy' of Tech Mahindra, its Subsidiaries and Joint Ventures (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 (UNG) on Business and Human Rights in our relationships with our employees and suppliers. TechM is committed to upholding of human rights within the communities we operate along with maintaining and improving systems and processes to avoid complicity in human right violations.

We conduct due diligence as a means to identify and prevent human rights risks to people in our business and value chain. We are committed to provide for or cooperate in, their fair and equitable remediation if any violations are caused by Tech Mahindra's business activities, or through our relationships with third parties.

Tech Mahindra's Human Rights Policy is overseen by Board of Directors, including the Chief Executive Officer.

## 2. SCOPE

This policy applies to:

- (i) Both executive and non-executive Directors of the company
- (ii) All Associates of the company on permanent and contract role.
- (iii) Suppliers, subsidiaries, distributors, business contacts, agents, advisors, business associates current and potential clients, customers and others acting on the Company's behalf.
- (iv) While dealing with government, public bodies and non-profit organizations including their advisors, representatives, officials, politicians and political parties

Tech Mahindra(TechM)'s training program for Code of Ethical Business and Conduct (CEBC) comprising of Human rights and Sexual Harassment is intended to give associates the understanding and awareness required to carry out their responsibilities in compliance with legislation and regulations. CEBC assessment is mandatory. All associates are required to clear an assessment test within 30 days of commencement of their employment and whenever considered necessary (for example after significant changes to content).

In some countries, local laws impose additional obligations on TechM regarding compliance with Human Trafficking, Forced Labor and Child Labor laws which may include, among other things implementing certain measures (e.g., compliance plans, specific clauses in agreements with third parties, annual certifications, statements, etc.) when entering into contracts with or in support of governments; making disclosures to the government that Human Trafficking, Forced Labor and Child Labor are not occurring at TechM or within TechM's supply chain, and reporting activity to the government that is inconsistent with these laws.

## 3. 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 access to water and health. We also engage with people in those communities, including indigenous people 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.

## 4. CREATING AN ENVIRONMENT FREE FROM BULLYING AND HARASSMENT

Tech Mahindra's Policy on Bullying and Harassment at workplace anti-discrimination is applicable to everyone who work with or engaged in the operations of the Company.

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 activities and networks in the workplace.

## 5. SEXUAL HARASSMENT

The Company aims to provide a safe working environment and prohibits any form of sexual harassment. Hence any act of sexual harassment or related retaliation against or by any associate is unacceptable. Tech Mahindra's Policy on Prevention of Sexual Harassment therefore, intends to prohibit such occurrences and also details procedures to follow when an associate believes that a violation of the policy has occurred within the ambit of all applicable regulations regarding sexual harassment. The policy outlines the preventive measure taken and framework for dealing with complaints if raised.

The Company mandates all associates to undergo an e-learning training followed by an assessment once in every two years.

[Read More: [Policy on Prevention of Sexual Harassment](#)]

## 6. ABUSE OF MANAGERIAL AUTHORITY

Abuse of Managerial authority means conduct by a reporting manager 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. DIVERSITY AND INCLUSION- D&I

The company promotes and supports a diverse workforce across all levels. We believe that Diversity and Inclusivity (D&I) at workplace is an instrument for growth and we value and celebrate the uniqueness of every individual by fostering an environment of inclusion and empowerment. Towards this we also ensure all our policies and practices are compliant and aligned to all applicable laws and regulations specific to Diversity and Inclusion

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.

[Read more: [Diversity and Inclusion Policy](#)]

## 8. FREEDOM OF ASSOCIATION

TechM respects the right of employees to exercise their lawful right of free association, participation, Collective bargaining and provide access to appropriate grievance Redressal mechanisms.

We have employee 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.

## 9. MODERN SLAVERY

Tech Mahindra's philosophy is to respect and promote human rights and, as part of this, Tech Mahindra is committed to addressing modern slavery in our business, operations and supply chains.

We are committed to exhibit zero tolerance towards all facets of modern slavery, as elaborated under the Modern Slavery Act, 2015, Commonwealth Modern Slavery Act, 2018, the UN Declaration of Human Rights and the conventions of the International Labour Organisations specified to forced or compulsory labour.

In pursuance of this, we publish a public statement 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 Statement](#)]

## 10. ENABLING A FLEXIBLE WORK CULTURE

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

We have a suite of flexible work arrangements across all countries we operate in which may include benefits like Parental Leave, Paternity and Maternity leave, Sabbatical for Higher Education, Time off for personal reasons, time off for Individual Corporate Responsibility and Corporate Social Responsibility activities etc.

## 11. 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, delivered through the state of the art Upskilling as a Service (UaaS) platform, span technology, domain, business, process, behaviour and leadership.

The Upskilling-as-a-service platform of #NewAgeDelivery enables associates to stay relevant and develop a culture of continuous learning. The AI based platform deploys Skill Knowledge Unit (SKUs) to provide holistic learning for employees and provides interactive, on-demand, contextual and personalised #upskilling to associates in self-service mode through world class content and assessments from various learning partners.

We provide training to all employees without differentiating on grounds of gender, age or physical ability. We also have specialized programs for senior leadership. Our Training group offers industry-

benchmarked learning programs to ensure talent enablement. The Training team has a large number of learning offerings and interventions including training on technical, managerial and process skills, industry domain knowledge and leadership skills for employees and our strategic clients.

## 12. 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. We implement rigorous plans to ensure safety and welfare of Associates and to protect the assets and information from and during a disruption.

We believe in creating awareness on work place practices and communicating information, instruction and training programs to enable all associates to comply with the Environment, health and safety policy of the company.

[Read more: [HSE policy](#)]

## 13. 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.

We are committed to pursuing plans that will create long-term value for all the stakeholders. 'Rise for Good' is our vision to create a better world. Going beyond just environmental compliance, we see long term value in being socially and environmentally responsible to ensure sustainable business growth. We use our sustainability philosophy to focus on ESG (environment, social and governance) aspects across all areas of our business including offering solutions to our customers.

## 14. 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.

## 15. DATA PRIVACY

Tech Mahindra is committed to protect the data privacy of employees (including ex-employees and retirees), customers and suppliers. Our current data protection and privacy framework includes multi-layer password protected authentication systems, automatic tools and tracking mechanisms, audits and information sharing on a need-to-know basis. We do not disclose information to third parties without explicit consent of our stakeholders, unless required by law to do so.

Our security incident management process allows reporting of data breaches and policy violations. Tech Mahindra also has a nominated & designated appointed Data privacy officer who can be reached at [dpo@techmahindra.com](mailto:dpo@techmahindra.com) for escalation of privacy issues.

## 16. HUMAN DIGNITY

We are committed to treating those engaged with our Company with dignity and respect. One of our core values is 'Dignity of an Individual' through which we affirm that we will value individual dignity, uphold the right to express disagreement and respect the time and efforts of others. Through our actions, we will nurture fairness, trust and transparency.

## 17. COMMUNICATION

Tech Mahindra communicates all necessary and relevant information with regards to organizational finances, policies and long term growth with associates. They are also made aware of related laws, guidelines and applicable policies when they join the organization and given periodic reminders during their time in employment.

## 18. CHILD LABOUR

TechM prohibits child laborers and forced or compulsory labor including bonded labor, slavery and human trafficking and the same is embodied in our Code of ethical business & conduct and Supply chain code of conduct policy. We prohibit the hiring of individuals that are under 18 years of age.

## 19. GRIEVANCE MECHANISM

TechM implements the above standards by incorporating it in related policies, processes and guidelines across all our business operations. TechM conducts trainings to strengthen in-house awareness and education on the practice of human rights. TechM believes that an empowered workforce is the best way to receive feedback and identify improvement areas.

Tech Mahindra's Whistle-blower Policy is a critical means through which stakeholders can raise actual or suspected violations. The Corporate Ombudsman is in charge of investigative procedures laid down and defined under the Whistle blower policy

[Read more: [Whistle Blower Policy](#)]

## 20. REVIEW

The policy is reviewed at least once a year or as and when there are any changes.