

# **Policy on Equal Employment, Diversity & Inclusion**

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## 1. OBJECTIVE

This document summarizes the employment policies and procedures applicable to personnel at Tech Mahindra. Tech Mahindra (here in after referred to as Company) is an Equal Opportunity Employer. The company promotes and supports a diverse workforce at all levels of the company. 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

## 2. INTRODUCTION

The Company considers its associates to be its most important resource and is committed to treating all associates with dignity and respect. In each location where the Company conducts business, it complies with local laws governing the employment relationship. Additionally, the Company is committed to creating and executing policies and processes in compliance with the spirit and scope of Diversity and Inclusion throughout its global organization.

## 3. DIVERSITY AND INCLUSION - SCOPE

The Company believes that creating a work environment that enables us to attract, retain and fully engage diverse talents leads to enhanced innovation and creativity in our service and a better understanding of our diverse client base. The Company ensures that its associates or potential hires, third-party support staff and suppliers are not unlawfully discriminated against, directly or indirectly, as a result of their color, creed, race, nationality, ethnic or national origin, connections with a national minority, marital or civil partnership status, pregnancy, age, disability, religion, or similar philosophical belief, sexual orientation, gender or gender reassignment or trade union membership etc. and will never tolerate harassment in any form.

The Diversity and Inclusion Head shall ensure implementation of this policy

### POLICY STATEMENT

The Company's philosophy is to build Inclusion and implement the Diversity policy through Diversity and Inclusion Councils, which are committed to encouraging and embracing our employees' differences.

The Company is committed to providing a Diverse workforce and Inclusive workplace

- 1) Creating a safe and secure work environment that is free from any discrimination which includes but is not limited to our policy of zero tolerance to sexual harassment
- 2) Having a robust framework to attract, engage and retain talent of all ages, genders, nationalities and abilities.
- 3) Building and fostering Diversity of:

- i) **Gender** - Focused initiatives that help us attract and retain talented women professionals through efforts spanning workplace practices, flex time practices, safe travelling, zero Tolerance on Sexual Harassment, and other support geared to facilitate smooth on-boarding / re-absorption of women after career breaks.
- ii) **Generational**- targeted to ensure for associates of multiple generations co-exist and develop as per individual aspirations and expectations
- iii) **Differently abled**- enable equal opportunities for differently abled professionals (also known as Persons with Disabilities) with initiatives aimed at an inclusive approach and ensuring equal opportunity.
- iv) **Cultural**- programs, policies and initiatives to promote cultural acclimatization of associates & inclusion across all countries through localization of talent, policies, learning interventions on cultural integration, cultural sensitivity trainings and other support.
- v) **LGBTQ** - We are inclusive and supportive to colleagues across the broad spectrum of sexuality and gender identity.
- vi) **Board of Directors**: Board appointments are based on merit that complements and expands the skills, experience, expertise of the Board as a whole, taking into account knowledge, professional experience, qualifications, gender, age, cultural, educational background, statutory / regulatory requirement and any other factors that might be relevant and applicable from time to time for it to function effectively. The company inter alia also has a diversity policy for the Board of Directors, for which the policy 'Governance policy for Board, Key Management Personnel & Senior Management' has been approved by the Board.

#### 4. DIFFERENTLY ABLED (PERSONS WITH DISABILITIES)

Tech Mahindra is an Equal Opportunity Employer and strongly endorses the right of equal opportunity for associates who are differently abled. In particular, the Company commits to carrying out the provisions of the recently enacted Rights of Persons with Disabilities Act, 2016 ("Act") in letter and spirit including providing specific opportunities in identified positions where they could be employed. While this act applies to India, the Company is committed to ensuring compliance with any and every Act applicable to associates who are differently abled. Company would also provide to them necessary facilities, amenities and training to support them as appropriate and enable them to effectively discharge their duties for which they are employed. The disabilities under consideration for associates are as specified by applicable Acts.

The Company adopts a transparent selection process based on merit and without any bias to disabilities of the prospective candidate. Infrastructure will be enabled to the extent feasible so that associates with disabilities will have a barrier-free access to common facilities including physical environment, transportation, information and communications including technologies and systems for persons with disabilities.

In addition, the Company shall conduct and promote awareness campaigns and sensitisation programmes through appropriate means among business teams specifically to build inclusion and support.

Associates in India will need to confirm their disability for consideration in above programs with appropriate documentation including Certification from appropriate medical / government authorities. To obtain the

same associates will need to apply via Form IV and required proofs as per process published by the relevant Government(s)

## 5. HUMAN RIGHTS

Company is committed to compliance with the requirements of all applicable employment, labor, and human rights laws to ensure fair and ethical employment practices are followed. We demonstrate our commitment in our employment practices, including our non-discrimination, minimum age requirement policies; and through our policies on health, safety, and security for our employees. Our goal is to conduct business with those who share our commitment to these same principles. We reject any form of slavery, forced or child labour. In line with this the Company does not employ people below the age of 18 years.

Company recognizes the legal obligations we have towards our associates, clients, suppliers, competitors and the community as a whole. Our reputation and brand, together with the trust and confidence our business eco- system has in us, is one of our most vital assets. The protection of our reputation is fundamentally important to us and therefore any breach of this policy by our people, suppliers, subcontractors, vendors etc. results in grounds for disciplinary and legal action.

Even with the best policies and practices in place, Tech Mahindra or its subsidiaries may cause, contribute or be subjected to an adverse human rights impact that was not foreseen or prevented. If it is identified that the Tech Mahindra or one of its subsidiaries is responsible for such an impact, Tech Mahindra will endeavor to remedy or co-operate in the remediation of the situation through legitimate processes. The company, therefore will follow the below remediation –

- Because employment of Child Labor is against Law, Tech Mahindra's principle and its guidelines we will have to remediate by cessation of employment
- We will strive to provide appropriate counseling and guidance as necessary to Associate and their Family
- We will consider the concern person for future employment opportunities based on fitment once the legal working age is attained

## 6. HIV/AIDS

### 6.1 Definition

"AIDS" means Acquired Immune Deficiency Syndrome, a condition characterized by a combination of signs and symptoms, caused by Human Immunodeficiency Virus, which attacks and weakens the body's immune system making the HIV-positive person susceptible to life threatening conditions or other conditions, as may be specified from time to time.

"HIV" means Human Immunodeficiency Virus;

“HIV-affected person” means an individual who is HIV-positive or whose partner (with whom such individual normally resides) is HIV-positive or has lost a partner (with whom such individual resided) due to AIDS;

“HIV-positive person” means a person whose HIV test has been confirmed positive;

## 6.2 Specific Provision

- **Rights of employees who are HIV-positive:** HIV positive associates will be protected against discrimination, victimization or harassment. Company disciplinary and grievance procedures shall apply equally to all associates, as will the provision of information and education about HIV and AIDS.
- **Employment opportunities and termination of employment** - No associate should suffer adverse consequences, whether dismissal or denial of appropriate alternative employment opportunities, merely on the basis of HIV infection.
- **Confidentiality** - The Company recognizes the sensitive issues that surround HIV/AIDS and undertakes to handle matters in a discreet and private manner. Where an associate with HIV has revealed his or her status to management, the Company will keep the identity of such person confidential. However in line with the Company philosophy on the virus, the associate will be encouraged to be open about his or her HIV status.
- **The promotion of associates' well-being.** The Company will treat associate who are infected or affected by HIV/AIDS with empathy and care. The Company will provide all reasonable assistance which may include counselling, time off, sick leave, and information regarding the virus and its effect.
- **Work performance and reasonable accommodation** - It is the policy of the Company to respond to the changing health status of associates by making reasonable accommodation in the workplace for those infected with HIV. Associates may continue to work as long as they are able to perform their duties safely and in accordance with accepted performance standards. If an associate with AIDS is unable to perform his or her tasks adequately, the manager or supervisor must resolve the problem according to the company's normal procedure on poor performance/ill health.

“reasonable accommodation” means minor adjustments to a job or work that enables an HIV-positive person who is otherwise qualified to enjoy equal benefits or to perform the essential functions of the job or work, as the case may be.

- **Healthcare** - Company will guide associates living with HIV/AIDS to find appropriate medical services in the community, as well as counselling services, professional support and self-help groups if required. Reasonable time off will be given for counselling and treatment.

## 6.3 Awareness & Education

- Appropriate awareness and education programmes will be conducted to inform associates about AIDS and HIV which will enable them to protect themselves and others against infection by HIV.
- The company recognizes the importance of involving associates and their representatives in the planning and implementation of awareness, education and counselling programmes, especially as peer educators and counsellors.

- Training shall be arranged for key staff including managers, supervisors, and personnel officers; union representatives; trainers of trainers; peer educators; and occupational safety and health officers.

#### 6.4 Discrimination

Associates living with HIV/AIDS will be treated no less favorably than staff with any other serious illness/condition in terms of statutory and company benefits, workplace compensation, where appropriate, and other available services.

Company will not discriminate or tolerate discrimination against associates or job applicants on any grounds, including HIV status. While Company recognizes that there are circumstances unique to HIV infection, this policy rests on the principle that HIV infection and AIDS should be treated like any other serious condition or illness that may affect employees. The Company's commitment to maintaining a safe and healthy work environment for all associates is based on the recognition that HIV is not transmitted by casual contact.

### 7. ABOLITION OF MODERN SLAVERY

#### 7.1 Definition

Slavery and Servitude Slavery, in accordance with the 1926 Slavery Convention and Article 4 of the European Convention on Human Rights, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised which deprives the victim their freedom.

Forced or Compulsory Labour is defined under the International Labour Organization's Forced Labour Convention 29 and Article 4 of the European Convention on Human Rights. As per the definition, the term forced or compulsory labour shall mean all work or service which is extracted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

Human Trafficking requires that a person arranges or facilitates the travel of another person with a view to exploit the person. The offence can be committed even where the victim consents to the travel.

#### 7.2 Policy Statement

Tech Mahindra considers its associates as a pivotal part of the Company and is committed to treat all associates with dignity and respect.

The Company is dedicated to create a working environment with highest degree of ethical and virtuous work practices. Company holds in high regard the guidelines laid down under the international conventions and laws relating to slavery and aims at maintaining a safe and harmonious working environment for each individual, irrespective of the work, designation, ethnicity, race, caste, gender, religion and other such parameters.

#### 7.3 Complying With Legal Requirements

A focus on modern slavery ensures protection of vulnerable workers and helps in preventing and remedying severe human rights violations in various supply chain and within the organization. Company upholds and encourages strict adherence to human rights and not hire any associate against their free-will or below the legal age. Forced or Compulsory Labour is not practiced in the Company.

#### 7.4 Steps Taken For UK – Modern Slavery Act 2015

In compliance with Article 54, Part 6 of the Modern Slavery Act 2015, Company, on a yearly basis, publishes a Slavery and Human Trafficking statement which includes the various steps taken by the Company during the financial year to ensure that Slavery and Human Trafficking is completely eradicated and exterminated from any of its supply chains and in any part of its own business.

#### 7.5 Corporate Governance Framework

We operate within a corporate governance framework that is underpinned by our vision and values which aims at securing the human life of all individual associates. 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.

Corporate governance framework followed by the Company is well established and externally benchmarked. Policies such as Code of Ethical Business Conduct, Whistle Blower policy, Fair Disclosure policy are available for investors, suppliers, clients and other stakeholders. It also focuses on setting up strong value-based working atmosphere within the organization with zero tolerance to related to issues violating human rights aspects.

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.

An associate can raise a concern with the CORPORATE OMBUDSMAN by:

- Sending an e-mail to CORPORATEOMBUDSMAN@techmahindra.com.
- In person - Complaints can also be reported verbally on telephone no. 0120-453- 4450. Verbal reports will normally be documented by the CORPORATE OMBUDSMAN by a written transcription of the verbal report.

#### 7.6 Failure To Comply

Failure to comply with the provisions of this policy will be considered as violation of policy and will be subject to disciplinary action which may even extend to termination of services or contract.

In practice, failure to comply with the provision by a vendor will mean the vendor has not produced a statement or undertaking, or has not set out the steps taken by their organization in the relevant financial year. This can include setting out that they have taken no such steps, or are just beginning investigations. Tech Mahindra would encourage clear, detailed and informative statements and undertakings.