

Human Rights Policy

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1. INTRODUCTION

This document specifies the “Human Rights Policy” of Tech Mahindra Ltd., its Subsidiaries and Joint Ventures (hereinafter referred to as “Tech Mahindra” / “TechM” / “Company”). Respect for Human rights is a fundamental value of Tech Mahindra. 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 stakeholders. TechM is committed to uphold human rights guidelines, National/International laws (EU directives, ILO mandates, Modern Slavery Act etc.) within the geographies we operate, along with maintenance and improvement of systems and processes to avoid complicity in human right violations.

We conduct due diligence 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 Code of Ethical Business Conduct (<https://insights.techmahindra.com/investors/Code-Of-Ethical-Business-Conduct.pdf>) is the umbrella policy and 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, including 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’s training program for Code of Ethical Business and Conduct (CEBC) and Prevention of Sexual Harassment (POSH) are intended to give associates the understanding and awareness required to carry out their responsibilities in compliance with legislations and regulations. CEBC and POSH training and assessments are mandatory. All associates are required to clear these assessments within 30 days of commencement of their employment and whenever considered necessary.

In some countries, local laws impose additional obligations on TechM regarding compliance with Human Trafficking, Anti-Discrimination, 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, Discrimination, 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.

Wherever appropriate, we engage with 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 policies on Anti-Bullying and Harassment at Workplace, Code of Ethical Business Conduct and Prevention of Sexual Harassment are applicable to everyone who work with or engage 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 reasonably 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 gestures 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 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 TechM

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 that 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 strive 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 to 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 Organisation 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 and Work from Home (WFH) due to the pandemic.

WFH ensures continuity of our services during adverse scenarios and helps safeguard the health, safety, and welfare of our associates, which is of paramount importance to us. Employees are entitled to 21 days of paid earned leave per year which can also be availed for any illness. We also have a policy of gifting leaves, which allows employees to gift their leaves to an employee in need of leaves.

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, spans across technology, domain-expertise, 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 personalized #upskilling to associates in self-service mode through world class content and assessments from various learning partners.

We provide training to all employees without differentiation on grounds of gender, age, or physical abilities. We also have specialized programs for senior leadership. Our Training group offers industry-benchmarked learning programs to ensure talent enablement. The Training team has many 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 workplace practices and communicating information, instructions, and training programs to enable all associates to comply with the Health, Safety and Environment policy of the company.

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

13. 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.

14. 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 for escalation of privacy issues.

[Read more: [Data Privacy and Protection Policy](#)]

15. 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.

16. 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.

17. 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.

18. 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 oversees investigative procedures laid down and defined under the Whistle blower policy.

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

19. ASSESSING HUMAN RIGHTS RISKS

Threats to human rights might arise not just from direct operations but also from indirect business activities carried out by vendors, contractors, or joint ventures that could result in complicity. So, we monitor, evaluate, and review actual or potential Human Rights risks across our commercial value chain and ensure they are mitigated before we go ahead with our collaborations. TechM shall also ensure ongoing monitoring, tracking and/or auditing while reporting the outcomes periodically.

- **Client or assignment:** The client or project manager must evaluate the risk that could directly or indirectly contribute to human rights violations or an escalation of conflict before accepting a new client or assignment.
- **Joint Ventures/mergers:** Integration of acquired organisation with TechM will pose its own set of risks, dependencies, and showstoppers and is dealt by the operations committee made up of the function heads, integration sponsors, and owners.
- **Suppliers:** Suppliers and their supply chains must adhere to the TechM Human Rights Policy, and we strive to enforce such policies via a rigorous three-pronged approach of: (1) sourcing and supplier selection, (2) contractual supplier requirements and (3) ongoing supplier relationship management.

20. REVIEW

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