

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. Tech Mahindra is committed to upholding 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 providing for or cooperating 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 ([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 roles.
- (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

3. EQUAL EMPLOYMENT OPPORTUNITY ORGANISATION

TechM is committed to providing equal employment opportunities to all associates and applicants for employment and prohibits discrimination or allowing harassment based on race, color, religion, disability, gender, national origin, sexual orientation, gender identity, gender expression, age, genetic information, military status, or any other legally protected status in every country where it operates.

Our code of ethics and business conduct (CEBC) promotes our inclusion strategy.

4. CEBC AND POSH TRAININGS

TechM’s training program for code of ethical business 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.

All associates are also required to record their confirmation of awareness of the CEBC annually and complete their refresher POSH awareness and certification program bi-annually. Associates must declare that they have read and will abide by the CEBC policy as available on the company's intranet by accepting the CEBC declaration.

In some countries, local laws impose additional obligations on Tech Mahindra regarding compliance with human trafficking, anti-discrimination, forced labour and child labour 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 labour and child labour are not occurring at Tech Mahindra or within TechM's supply chain, and reporting activity to the government that is inconsistent with these laws.

[Read More: <https://insights.techmahindra.com/investors/cebc-training.pdf>]

5. DIVERSITY AND INCLUSION

The company promotes and supports a globally diverse workforce across all levels. We believe that diversity and inclusivity (D&I) at the 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 with 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](#)]

6. ENABLING A FLEXIBLE WORK CULTURE

We believe that providing a flexible work culture is important in keeping our associates motivated, engaged, and retained.

Flexible work arrangements are provided across all TechM locations including benefits like parental leave, paternity and maternity leave, sabbatical for higher education, time off for personal reasons and work from Home (WFH) as per business requirement and under the prevailing regulation. 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. We also provide time off for individual corporate responsibility and corporate social responsibility activities.

TechM ensures 100% compliance with working hours as applicable by local laws and regulations.

7. 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.

8. PREVENTION OF 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 every two years.

[Read More: Policy on Prevention of Sexual Harassment- POSH

<https://insights.techmahindra.com/investors/Policy-on-Prevention-of-Sexual-Harassment.pdf>

9. 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 Mahindra

10. REMUNERATION PHILOSOPHY

Our remuneration philosophy is designed to maintain pay parity across the workforce. The compensation fitment is based purely on qualifications, experience, band, job requirements, location, performance and skills without any bias on account of gender, caste, colour, ethnicity, nationality, religion, disability, sexual orientation etc.

The principle of equal opportunity is embedded in all our policies and personal actions, including but not limited to recruitment, hiring, promotion, transfer, compensation, benefits, training and education.

11. WAGES

We ensure all associates are paid adequately to maintain a standard of living. At all times, company ensures it pays associates higher than the minimum wages prescribed by governments, in the various countries it operates globally.

12. FREEDOM OF ASSOCIATION

Tech Mahindra respects the right of associates to exercise their lawful right of free association, participation, collective bargaining and provide access to appropriate grievance redressal mechanisms.

We have associate 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.

13. HUMAN DIGNITY

We are committed to treating those engaged with our company with dignity and respect. One of our core values is the 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.

14. 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 exhibiting 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 Organization 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](#)]

15. 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 assets and information from and during disruptions.

We believe in creating awareness of 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](#)]

16. 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 associates are provided, as needed, and are maintained with respect for associate privacy and dignity.

17. CHILD AND FORCED LABOUR

TechM prohibits child labour and forced or compulsory labour, including bonded labour, 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.

We are against any form of coerced or prison labour, use of physical punishment or threats of violence or other forms of physical, sexual, psychological, or verbal abuse as a method of discipline or control.

18. ANTI-CORRUPTION AND BRIBERY

Our anti-corruption and anti-bribery policy calls out our position on corruption and bribery. This policy and associated processes are reviewed at regular intervals. We have adopted a whistleblower mechanism for reporting concerns about unethical behavior, actual or suspected fraud, or violation of the company's code of conduct and ethics.

[Read more: <https://insights.techmahindra.com/investors/anti-corruption-and-anti-bribery-policy.pdf>]

19. EMPLOYMENT PRACTICES

At Tech Mahindra, we comply with all applicable laws and labour agreements, maintaining high moral, legal, and ethical standards. Employees are encouraged to use their annual earned leaves, which are provided according to local legal requirements. Any unused annual earned leave beyond the permissible carry-forward limit will expire or be encashed as per local law.

Employee working hours are monitored through automated timesheets to ensure adherence to local legal requirements. Overtime, if required, may be undertaken only with prior approval from the reporting manager and mutual agreement; all overtime must be accurately recorded in the timesheet. Compensation for overtime is provided as per relevant statutory provisions and company policies. At no point shall total working hours, including overtime, exceed the limits prescribed by local laws.

Tech Mahindra's employment separation procedures are conducted transparently and in accordance with applicable labour regulations, including the provision of required notices and payouts.

20. SUSTAINABILITY

Tech Mahindra is committed to upholding ethical and sustainable business practices across all our operations and value chain as guided by the Mahindra Sustainability Framework. As a socially responsible entity, our purpose is to provide sustainable value to all our stakeholders including our employees, customers, investors, suppliers, governments, and communities. Through a culture of innovation and inclusiveness, we endeavor to make a positive impact not only on our immediate stakeholders but also on the broader social and environmental spheres. We involve practices that promote renewable resources, decrease emissions, minimize waste, foster social equity and protect biodiversity. We ensure transparency and accountability by publishing independently verified sustainability data in our integrated annual reports in accordance with international standards and frameworks, fostering a business ecosystem that is both fair and environmentally responsible.

[Read more: [Sustainability Policy](#)]

21. DATA PRIVACY

Tech Mahindra is committed to protecting the data privacy of associates (including ex-associates 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 the 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 and designated appointed data privacy officer who can be reached at dpo@techmahindra.com for escalation of privacy issues.

[Read more: <https://insights.techmahindra.com/investors/high-level-extracts-from-data-privacy-and-protection-policy.pdf>]

22. RAISING CONCERNS/COMPLAINTS

Tech Mahindra commits to upholding ethical business practices in every country we operate in. We promote an environment where stakeholders can report any actual or perceived wrongdoing without fear of retaliation. Tech Mahindra's whistleblower policy is a critical means through which stakeholders can raise actual or suspected violations in good faith. Such concerns should be raised as soon as possible to the corporate ombudsman by sending an e-mail to CorporateOmbudsman@techmahindra.com. The corporate ombudsman oversees investigative procedures laid down and defined under the Whistle blower policy.

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

23. PROMOTING ASSOCIATE MORALE, SKILL UPGRADATION, CAREER DEVELOPMENT

All associates are covered under competency development programs that are relevant to their role in the organization. Our Training group focuses on achieving optimum working outcomes by offering industry-benchmarked learning programs, ensuring talent enablement and transformation of associate skills. We also have specialized programs for senior leadership. We seek to develop a sustainable talent pipeline by collaborating with educational institutions, internship and apprenticeship programs as well as talent

acquisition and recruitment teams. We provide training to all associates without differentiation on grounds of gender, age, or physical abilities.

24. COMMUNICATION

TechM 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 are given periodic reminders during their time in employment.

25. ASSOCIATE HANDBOOK

We are committed to ensuring compliance with all our obligations globally and in doing so, believe it is important to educate associates on their rights and responsibilities. We have created reference documents in the form of associates handbooks and policy portals, that serve as a guide to associates on their benefit entitlements. These documents are reviewed regularly to ensure they are always updated

26. REVIEW

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