

Policy on Equal Employment, Diversity & Inclusion

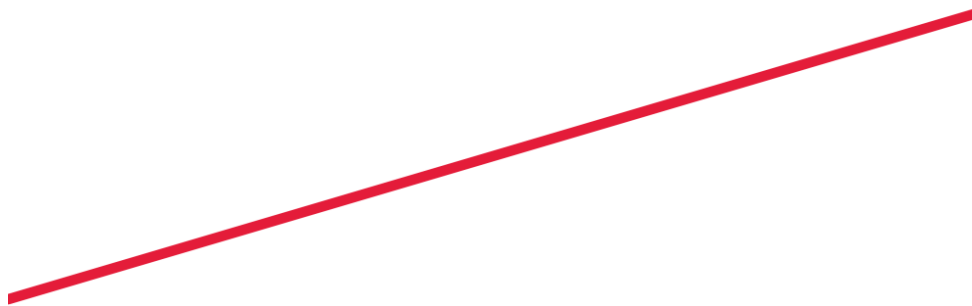


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1. OBJECTIVE

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 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) Culture & Nationalities- 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

We are committed to treating those engaged with our Company with dignity and respect. 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.

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 associates 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 programs 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 programs, 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. REMUNERATION PHILOSOPHY

Tech Mahindra is an equal opportunity employer and values Diversity, Equity and Inclusion. Providing a work environment free from any form of unlawful or unprofessional discrimination and complying with all applicable laws prohibiting discrimination against any applicant or associate is core to the company.

Our remuneration philosophy is designed to maintain pay parity across the workforce. The compensation fitment is based on 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.

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.

8. ABOLITION OF MODERN SLAVERY

Tech Mahindra's philosophy is to respect and promote human rights and as part of this, we are committed to addressing modern slavery in our business, operations, and supply chains. We 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. Our commitment to eradicate modern slavery is also articulated in our Modern Slavery statement which is available on our website.

9. PREVENTION OF SEXUAL HARASSMENT

The Company's Policy on Prevention of Sexual Harassment aims at bringing 'zero tolerance' policy on any act of sexual harassment / any discrimination based on sex and promote a work environment that encourages mutual respect, promotes respectful and congenial relationships between Associates, and is free from all forms of sexual harassment to any Associate or applicant for employment by anyone including vendors, or customers.

Sexual Harassment is a form of discrimination which includes a range of behaviour from seemingly mild transgressions and annoyances to actual sexual abuse or sexual assault and will not be accepted in any form or manner.

Sexual harassment includes conduct of associates, managers, vendors and / or customers who engage in verbally or physically harassing behaviour, which has the potential for humiliating or embarrassing an associate of the Company.

According to Tech Mahindra's Policy on Prevention of Sexual Harassment, everyone in the Company is responsible for assuring that a workplace free of sexual harassment is maintained. We are committed to maintaining a lawful, pleasant work environment where all Associates can effectively perform their work without interference of any type and requests the assistance of all Associates in this effort.

All Company supervisors and managers are expected to adhere to the Company's Policy on Prevention of Sexual Harassment Policy.

Any sexual harassment complaint regarding incidents experienced personally or incidents observed in the workplace can be raised at posh@techmahindra.com for the POSH committee to examine and address.

10. 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 related to issues violating human rights aspects.

The COREPORATE OMBUDSMAN is an independent management function and is primarily responsible for investigation and redressal of concerns about Integrity and non-compliance.

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.