CO-CREATE TO OUTPERFORM WITH WNS™

Policy on Fair Treatment, Respect & Dignity at Workplace

Global

October 01st, 2019





Synopsis

Add text here

Reference	SUP/166
Status	Definitive
Author	Legal Team
Authorized	Gopi Krishnan, General Counsel
Approved	CEO's office
Approved	Keshav Murugesh, Group CEO



Table of Contents

1.	Background	4
2.	Scope	4
3.	Assurance: Anti- Discrimination	4
4.	Bullying as a form of harassment	5
5.	Harassment as a punishable offense	5
ô.	How to recognize sexual harassment?	6
7.	Prevention of violence	6
3.	Prohibition against use of drug/ Alcohol	7
9.	What is in it for me?	7
10.	What can I expect under this policy?	7
11.	How will this policy be enforced?	8
12.	How do I raise an issue under this Policy?	9
13.	What happens when I raise an issue under this Policy?	9
14.	How are the issues resolved under this policy?	10
Docu	ıment Control	11
Sche	edule	12
	List of Reporting Channels	12



1. Background

WNS values the fundamental human right to seek opportunities, perform and excel at work. Towards this endeavor all individuals are treated equally, without discrimination on the basis of race, caste, religion, sex, colour, age, national and social origin, marital status, pregnancy (including child birth), sexual orientation or any other status protected by applicable law and policy in seeking employment and in pursuing their career aspirations with WNS. We make all employment decisions strictly on the basis of employees'/ candidates' merits and requisite talent criteria.

WNS strictly prohibits harassment in any form (unwanted physical or verbal conduct, bullying and mobbing) that makes an individual uncomfortable.

In accordance with this commitment, this policy outlines the obligations and responsibilities of management in providing a working environment which is free of discrimination or harassment of any kind and ensuring that all employees are treated with dignity and respect.

2. Scope

This policy covers:

Discrimination: Excluding, with-holding, isolating or targeting an individual on the basis of biological, physical, social, cultural or behavioural attributes resulting in humiliation, ridicule or demeaning of the individual and thereby causing discomfort or disadvantage to the individual at work.

Bullying: Use of force, power or threat to persuade or exclude an employee from conducting himself/ herself in a desired manner, thereby causing mental stress or stigma to an individual about his or her personality.

Harassment: Conduct or behavior that is objectionable, improper or inappropriate to the individual, and is detrimental or counter productive to the individual's ability to perform and excel at work.

Any other action, behavior or conduct including spoken words, gestures and suggestive notes which is derogatory or unacceptable as per the standards of behavior at workplace, irrespective of whether it occurs in the place of work, business trips, work related events or social functions.

Reference to work and workplace is in the course of and/ or by virtue of the employment or engagement in relation to work. It also covers bullying and harassment by employees (which may include consultants, contractors and outsourced employees) and also by third parties such as customers, suppliers or visitors to our premises. This policy is applicable to all employees, officers, consultants, contractors, volunteers, interns, casual workers and outsourced employees.

3. Assurance: Anti- Discrimination

The Company shall, unless otherwise required by law, make all its employment decisions on merit and business needs. It will not in any manner be determined by race, colour, gender, age sexual orientation, personal appearance, religion, creed, national origin or ancestry, citizenship, physical or mental disability, pregnancy, child birth or related medical conditions, other medical conditions, genetic tests or characteristics, veteran or military status, marital or familial status, political affiliation, or any other factor protected by law.



In terms of this Assurance, the Company will also comply with all applicable laws and regulations to safeguard the interest of people suffering with disabilities. Accordingly, any qualified employee or a job aspirant will not be considered to be less favorable because of a specific physical or mental disability as long as the person is qualified and possesses the necessary skills, aptitude and disposition to perform the job as per its defined outcome. For this purpose, the company will make reasonable accommodation in the working condition, wherever necessary, for providing assistance to safely perform the essential duties of the job, as long as such accommodation do not impose undue hardship on the company and will not be discriminatory to other employees.

4. Bullying as a form of harassment

- a) Bullying is offensive, intimidating, malicious or insulting behavior involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation.
- b) Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:
 - i. physical or psychological threats;
 - ii. overbearing and intimidating levels of supervision;
 - iii. inappropriate derogatory remarks about someone's performance;
- c) Legitimate, reasonable and constructive criticism of a worker's performance or behavior, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

Any behavior or conduct demonstrating power or authority and is detrimental to the well being of the employee because it is deliberate, motivated, intentional or persistent causing mental or emotional trauma to the employee concerned, will be considered to be harassment and will be dealt with in accordance with this Policy.

5. Harassment as a punishable offense

- a) Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. While harassment is caused by repetitive or persistent behavior, a single incident too can amount to harassment in case of irreversible damage to the employee concerned.
- b) It also includes treating someone less favorably because they have submitted or refused to submit to such behavior in the past.
- c) Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment/ alteration, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.
- d) Harassment may include, for example:



- i. unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
- ii. continued suggestions for social activity after it have been made clear that such suggestions are unwelcome;
- iii. Sending or displaying material that is pornographic or that some people may find offensive (including e-mails, text messages, video clips and images sent by mobile phone, shared on the social media or uninhibited possession, use or access of the same at work or in the course of work) posted on the internet);
- iv. unwelcome sexual advances or suggestive behavior (which the harasser may perceive as harmless);
- v. racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender;
- vi. outing or threatening to out someone as gay or lesbian;
- vii. offensive e-mails, text messages or social media content; or
- viii. mocking, mimicking or belittling a person's disability.
- e) A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.
- f) Retaliation for having reported or threat to report harassment, or for opposing unlawful harassment, or for participating in an investigation, is also considered to be a form of harassment and a punishable offense.

6. How to recognize sexual harassment?

Sexual harassment occurs when submission to, or rejection of unwelcome sexual conduct is used as a basis for employment decisions;

Or

When submission to sexual harassment is a condition for receiving employment benefits, promotions, raises etc.

Sexual harassment also occurs when unwelcome sexual conduct unreasonably interferes with job performance or creates an intimidating, hostile or offensive working environment, even if does not lead to tangible or economic job consequences.

Sexual harassment includes the harassment of one individual by another irrespective of the gender Viz, It would include harassment of women by men, men by women, women by women, men by men and by/of any other category or classification of gender, as disclosed or identified by the individuals concerned.

7. Prevention of violence

As a part of our commitment to providing safe and secured workplace to all our employees, the company not only prohibits any act or threat of physical violence, but will treat behaviors or conduct in



the nature of intimidation, harassment or coercion as acts of violence, if it affects or has the probability of affecting the performance and/ or well-being of the employee in general.

For this purpose, the company will impose necessary restriction on the use, access or possession of any kind of object, weapon, drugs or substance, that is likely to cause threat or create a fear or apprehension of violence to the employee concerned.

Specific examples of conduct which may be considered threats or acts of violence include, but are not limited to, the following:

- Threats or acts of physical harm or aggressive contact directed towards another individual or his/ her family, friends, associates or property. Workplace violence does not refer to occasional comments of a socially acceptable nature;
- The intentional destruction or threat of destruction of Company property or another employee's property;
- Harassing or threatening phone calls, conversations, letters, emails, or voice mails;
- Surveillance or stalking;
- Possession of any object or weapon, which is likely to cause harm or injury to the other person or is suggestive of any indicative behavior, which is socially unacceptable;

8. Prohibition against use of drug/ Alcohol

As a part of our commitment to providing safe, efficient and productive work environment, reporting to work under the influence of alcohol or any illegal drug or possessing or using the same while on duty, will be considered to be causing threat or discomfort to the other employees, whether it is objected to or not. Such a behavior or conduct will be considered to be a case for harassment and treated under this policy for appropriate disciplinary action.

9. What is in it for me?

All managers are responsible to ensure that employees in their departments are aware of the requirements of this policy and to ensure immediate action is taken when such a matter is reported. Moreover, employees are required to acquaint and familiarize themselves with the policy and procedure to ensure that they refrain from actions constituting discrimination or harassment as per this policy.

10. What can I expect under this policy?

To protect employees from claiming victims of inappropriate behavior or conduct under this policy, the management is committed to provide the following:

i. Multiple reporting channels viz. Email, web reporting, helpline and contact details of the person responsible for addressing the issues, so that the victim is provided with the opportunity to report the matter in a manner that is most convenient and reasonable for reporting the matter; **Please** refer to the Schedule to this Policy, for the details of the same.



The operating/ local management is responsible for cascading the above information with such additional details as may be prescribed under the local laws/ mandate, as applicable.

- ii. Assurance of "No Retaliation" for bringing the matter to the attention of management;
- iii. Exceptional medical leave, at the request of the employee on health grounds against medical advice, in case of traumatizing circumstances for the employee who has been victimized. Such a leave would be paid leave in addition to the entitlement of the employee for leave as per the service rules applicable to him/ her;
- iv. Where an employee subjected to sexual harassment is deemed, on medical and/ or professional advice, to require counselling, the company will bear the cost of such counselling sessions (s), restricted to a maximum of three such sessions.
- v. If, however the treating Psychologist or the medical practitioner recommends extension of the treatment, the company shall consider the same on a case by case basis and provide reimbursement of such treatment, depending on the investigation findings confirming the allegations and as per the medical benefits scheme applicable to the employee.

11. How will this policy be enforced?

In most of the countries, issues related with employee behavior and conduct which undermines the safety and dignity of the fellow employees, is a subject matter of protection by the law. Accordingly, legal requirements as applicable in the respective jurisdiction of this policy, shall be applied in the implementation of this policy, subject to the following conditions:

- i. The Policy shall be widely publicized by way of display and through the digital medium so that the employees are aware of their rights and responsibilities under the policy. All new employees shall be provided with a copy of the policy as a part of the induction kit so that they can familiarize themselves with the subject matter of the policy as a part of their terms of employment;
- ii. All employees will be required to undergo a mandatory training program covering the practical aspects of the policy, annually, failing which their annual evaluation process will be impacted;
- iii. Reliefs and remedies available to the employee as an interim measure, pending investigation, will be as per the legal requirement, and in case no such legal requirement exists, it will be as per the employee welfare scheme applicable to the employee.
- iv. Copy of the complaint, written statements from the respondent, recording of witnesses, cross-examination, investigation notes, investigation report, findings and outcome of the investigation and such other related documents, may be subject matter of legal privilege. Accordingly, they are required to be stored in safe custody with security standards for limited access, only to the people involved in the investigation;
- v. In case of mediation, settlement or a compromise, requests for the same shall be entertained only from the victim, after satisfying that the victim is not under any threat or coercion to do so; The role of the management in such a case will be only facilitating the two sides to arrive at a consensus.
- vi. Management is committed to protect the identity and confidentiality of the parties concerned and accordingly, management representatives entrusted with the responsibility of handling the issues under this policy shall uphold their commitment to safeguard and protect the secrecy and the



terms of reference under this policy beyond their employment / contractual engagement with the Company.

12. How do I raise an issue under this Policy?

- 1. As a matter of principle, the first point of contact to raise any behavior or conduct related issues, would be the line manager or supervisor of the employee;
- 2. Such a complaint has to be in writing. In case the employee is not in a position to write, the same should be written down in the presence of the employee and acknowledged by the employee that it has been read out to the employee and is in accordance with the version as narrated by the employee to the scriber.
- 3. The complaint should have full details of the conduct in question, including the name of the harasser or bully, the nature of the harassment or bullying, the date(s) and time (s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.
- 4. If the allegations or the complaint is against the line manager or the supervisor, then the next level of authority to receive the complaint is the skip-level manager or the concerned HR Manager.
- 5. At any given point of time, after making a complaint, the victim may choose to withdraw the complaint, with or without ascribing any reasons for the same. In such an event, the Management shall ensure that the choice of the employee is voluntary and not as a result of any threat or coercion form any third party including the alleged offender.
- 6. In case of any other redressal mechanism existing within the organization as per the local laws or as prescribed by the company from time to time, the employee shall approach the same.
- 7. Resolution of the Complaint shall be in accordance with the prescribed procedure in accordance with the local laws and where there is no such prescribed procedure, shall be in accordance with the disciplinary proceedings prescribed for misconduct, as per the service rules and HR policy as applicable.
- 8. The list of reporting channels available to the employee for reporting matters under this policy is provided in the attached Schedule.

13. What happens when I raise an issue under this Policy?

All formal complaints shall be thoroughly investigated by a committee of members to be appointed in accordance with the law and/or to be prescribed in accordance with the applicable disciplinary process, in a timely and confidential manner.

Any person with a potential conflict or involvement in the proposed outcome of the case, shall recluse himself/ herself from the investigation process.

Process of natural justice shall be followed and accordingly, both the parties shall get an opportunity to represent their case in person to the committee and make necessary submissions along with producing witnesses and opportunity for cross-examination.

Based on the nature of the allegations and prima facie circumstances of the case, the Committee shall take cognizance of the request of the victim to suspend the employee against whom the



allegation has been made or consider requests for transfer/ leave of absence, as the situation may warrant.

At the end of the investigation, both the parties will be entitled to know the outcome of the investigation, in terms of (i) conclusion and (ii) proposed action to be taken.

14. How are the issues resolved under this policy?

In case the allegations are found to be true or the investigation has concluded that there are circumstances to suggest a possible intimidating or fearful working relationship between the employees concerned, appropriate action would be taken to resolve the matter including disciplinary action for misconduct which may range for written warning to termination/ legal action, depending on the severity of the incident and the impact on the victim.

Even where the allegations are not borne out, the management shall take necessary action to manage the ongoing working relationship between the employees concerned through appropriate mediation and/ or counselling or making necessary changes in the working conditions viz. change of working location, reporting relationship or shift timings, etc. so that the issues do not precipitate or perpetuate, as an outcome of the investigation.

In case of allegations made with a malafide intention or fabricated evidences, it will be treated as an independent case of gross misconduct and will be subjected to disciplinary proceedings. In case the employee who has suffered from false allegations wishes to pursue legal remedies as may be available in law, the Company may, based on the merits of the case, extend necessary support without compromising on the confidentiality guaranteed under this policy and take necessary corrective action, in conclusion of the claims of false allegations made by the employee.

Effective Date: Date • Page 10 of 12 • Private & Non-Sensitive



Document Control

Title: Equal Opportunity, Anti-harassment and Bullying Policy

Identification: SUP/166 No of pages: 12

Issue Number: Second Amendment: First

Date of issue: July 01st, 2019 **Status:** Definitive

Amendment summary:

Date	Version	Reason for Amendment
July 01 st , 2019	2.0	Replacement our existing policy on Prevention of Sexual Harassment

Circulation: All employees

External references: Applicable local law

Associated documents: Disciplinary Action Policy or Misconduct policy



Schedule

List of Reporting Channels

For Raising Concerns/ Issues Under this Policy

In case of violation or breach of Policy on Fair Treatment and Protection of Respect and Dignity at Workplace	E Mail: Respectful.workplace@wns.com		
Incase of issues of sexual harassment nature	E Mail: Ashforum@wns.com		
Incase of any other issue of a nature prescribed under the above policy	E Mail: Whistleblower@wns.com		
Other Modes of reporting			
Toll Free No.*	Refer to the list below for country-specific toll free nos. provided by an independent external agency, with translation services available in local languages.		
Web-reporting	Report online @ Mysafeworkplace.com or By clicking WNS Speak-up Helpline (WNS Whats-up eSpace)		
Write directly with evidences and nature of grievances to:	Gopi.Krishnan@wns.com Thomas.joseph@wns.com Pooja.Mirchandi@wns.com		

*

India	000 800 100 3428/ 000 800 100 4175
Philippines	00 800 1777 9999 / (+63)-2-6263049
China	400 120 3062
South Africa	00 800 1777 9999/ + 27 105 004106
Srilanka	2472494
Costa Rica	+ 506 4000 3876
Romania	0800360228
Poland	008001113819/ 00 800 141 0213
United States of America	1800 461 9330
United Kingdom	0808 189 1053/ 00 800 1777 9999