

GLOBAL ETHICS POLICY

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Introduction

The Global Ethics Policy (“**Policy**”) formalizes Firstsource’s commitment to a high standard of ethics and integrity. Through this Policy, Firstsource aims to facilitate its employees’ abilities to fulfill legal and ethical responsibilities in day-to-day business activities and dealings.

Firstsource operates in multiple geographies, and its business operations are subject to national and local laws. Firstsource will not undertake any project or activity that violates applicable laws.

Firstsource prides itself on maintaining a zero-tolerance approach towards unethical behavior and expects employees, irrespective of their level, role, and location, to ensure that their behaviors and activities are consistent with this Policy. In many cases, even the appearance of wrongdoing, however innocent, may lead to expensive and time-consuming litigation, adverse publicity, and damaged business relationships. When the best course of action is unclear, Firstsource urges employees to seek guidance from their reporting manager, or the Human Resource Department.

This Policy is continually evolving. The Policy cannot, nor does it intend to, encompass every situation and is subject to revision based on business requirements and changes in laws and regulations.

Policy Coverage

This Policy applies to employees, trainees, interns, apprentices, contract employees, consultants, vendors/suppliers, clients, customers and business partners (together referred to as “Firstsource Personnel”) while working on Firstsource premises, at off-site locations where business is being conducted, at business and social events sponsored by Firstsource and at all places where the employee represents Firstsource as well as when the employees are interacting with each other in their course of employment at Firstsource (“Firstsource Workplaces”).

Purpose

The Policy aims at building a clear and common understanding of “ethics”, the importance of “ethical behavior” and what is meant by “unethical behavior” across Firstsource. It contains principles expressing the general policy at Firstsource and standards that guide the implementation of those principles. In addition to using this Policy as a general guide, employees should refer to their respective demographic areas employee handbook and/or Firstsource policies.

This Policy provide a comprehensive framework through which complex regulatory and ethical matters can be addressed on a continual basis and in a consistent manner. Ensuring

compliance is everyone's responsibility at Firstsource, and Firstsource Personnel are expected to read, comprehend, adhere to, and enforce this Policy. Employees in roles/positions that are responsible for engaging contractors, vendors and/or suppliers must acquaint these external parties to the company with this Policy.

If any event/ action is non-compliant with applicable laws and/ or inconsistent with Firstsource's policies and values and/ or unauthorized or unapproved by Firstsource or its shareholders or clients, is detrimental to the business of Firstsource, and employees should not engage in such event or action. In case of uncertainty, employees should consult their reporting manager and/or the Human Resource Department. The information set forth in this Policy is designed to promote ethical business standards and professional conduct. In addition, and notwithstanding these principles, Firstsource Personnel shall comply with all applicable laws and to the extent that anything set forth herein is inconsistent with any applicable law, such law shall apply. The standards set forth in this Policy shall not operate to provide for any conflict with or violation of applicable laws.

This Policy is critical to Firstsource and the Human Resources team evaluates the effectiveness of this Policy on an ongoing basis through local and global monitoring and audit efforts.

Reporting Unethical Conduct and Investigation

Reporting violations: Firstsource Personnel is responsible for adhering to this Policy and must be able to identify and detect violations in order to report the same to one's reporting manager, the Human Resource Department, or Legal and Compliance heads. Alternatively, Violations to this Policy can be reported to a confidential email id whistleblowing@firstsource.com. For details on the reporting procedures, please refer to the [whistleblowing Policy](#)

It is Firstsource's commitment to deal with any and every act of unethical conduct promptly, in a fair manner by opening and investigating and determining the appropriate resolution based on the outcome of such an investigation. Firstsource will ensure a professional and unbiased review, providing all involved parties the opportunity to be heard and present their case. Firstsource Personnel are required to actively participate in any necessary investigations. Firstsource will take all reasonable steps to maintain, within the limits of the law or business need, the anonymity and/or confidentiality of the individuals involved, and the events alleged.

Employees are required to make good faith reports of violations or suspected violations of this Policy and/or to provide their full cooperation during the investigation. Retaliation against an employee for making a good faith report of a violation or for assisting in any investigation is prohibited. Any individual who engages in such retaliation is subject to disciplinary action up to and including termination of employment.

Sign-Off: Firstsource Personnel will be required to review and acknowledge that they have read, understood, and will comply with the Global Ethics Policy. This Policy will be made available to employees through all Firstsource communication channels and the sign off would be administered through manual or electronic means.

Principle 1: BEHAVIOURAL CONDUCT

Firstsource values diversity and is committed to being an equal opportunity employer. Firstsource expects employees to exercise good judgment to ensure a safe and healthy working environment for fellow employees, contractors, clients, customers and third parties alike. Firstsource expects Employees to follow moral and ethical business practices and ensure fair treatment of all individuals without discriminating on any grounds prohibited by law. Firstsource strictly prohibits harassment, victimization, bullying, workplace violence and misuse of Firstsource assets and intellectual property information.

Standard 1.1 Performance with integrity

Firstsource Personnel should display integrity and promotes a culture that fosters high standards of performance and ethical conduct. Firstsource expects employees to provide accurate information with respect to the performance of their duties and responsibilities and discourages supporting/getting actively involved in any activity that can adversely affect Firstsource's business interests.

Employees shall ensure the integrity of the data (including personal information) furnished to Firstsource. This includes, but is not limited to, data with respect to past employment and salary details, educational qualifications and certifications, past criminal record (unless impermissible pursuant to applicable law) and past/existing medical conditions (if relevant to the employee's safe performance of job functions or otherwise consistent with business necessity). When such data and information can or must be provided by law, employees shall not provide false or incorrect information to Firstsource and third parties.

Standard 1.2 Mutual respect

Firstsource prides itself as an organization where every individual is treated with respect, dignity, and equality. Firstsource encourages diversity and places emphasis on encouraging varied thoughts and views. Firstsource values transparency and follows the system of merit, thus encouraging fair treatment of every individual. Employees shall be respectful towards colleagues, vendors, suppliers, clients and clients' customers, and shall understand and respect geographical, cultural, gender-based and/or personal differences.

Standard 1.3 Human rights and equal opportunity

Firstsource respects human rights and conducts Firstsource workplace activities in compliance with applicable laws, regulations and policies related to human rights and non-discrimination. Firstsource prohibits and condemns activities such as child labor, forced labor and physical punishment and is committed to ensuring that the same philosophy is shared by organizations that it does business with. It is Firstsource's policy to provide equal opportunities to employees (and all qualified applicants). For more details, please refer to the [Global Human Rights Policy](#)

All Firstsource procedures governing recruitment, hiring, compensation, training, corrective action, discipline, promotions, staff reductions and terminations are carried out without any discrimination on the basis of race, colour, religion, ethnicity, sex (including pregnancy, childbirth and related conditions), gender identity, sexual orientation, national origin, age, disability, protected veteran status, genetic information or any other classification protected by law.

Standard 1.4 Harassment

Firstsource endeavors to have an environment free of any harassment based on an individual's race, color, religion, ethnicity, sex (including pregnancy, childbirth and related conditions), gender identity and sexual orientation, national origin, age, disability, protected veteran status, genetic information or any other characteristic protected by law.

Standard 1.5 Providing a healthy and safe work environment

Firstsource endeavors to provide its employees with a clean, healthy, and safe working environment. Ensuring employee safety is a primary concern for Firstsource and therefore complies with all applicable laws and regulations to ensure a secure and healthy work environment. Additionally, employees are mandated to comply with all health and safety policies of Firstsource. For more details, please refer to your local employee handbook, and/or Human Resource policies.

Standard 1.6 Violence and possession of firearms

Firstsource endeavors to provide a safe, secure, and congenial work environment where Employees can deliver their best without any inhibition, threat, or fear. While interacting with one another and with external stakeholders, employees must ensure that they are not hostile, violent, intimidating, threatening, or demeaning. Firstsource prohibits employees or any third parties on its premises or acting on its behalf from engaging in criminal conduct, acts of violence, making threats of violence towards anyone, possessing weapons, illegal firearms, or explosives while being within Firstsource Workplaces.

Firstsource prohibits any other disruptive behaviour towards Firstsource's business and urges employees who observe disruptive or offensive behaviour to report the same to their reporting manager, or the Human Resource department.

Standard 1.7 Substance abuse

Firstsource prohibits the misuse of controlled substances. Making, selling, distributing, possessing, using or being under the influence of illegal drugs and alcohol while on the job is strictly prohibited. For more details, please refer to your local employee handbook, and/or Human Resource policies.

Standard 1.8 Use of Firstsource properties

Employees shall not misuse property, tangible and intangible, belonging to Firstsource and/or its clients. Tangible Firstsource property includes, but is not limited to, systems, equipment, materials, and resources. Intangible Firstsource property includes, but is not limited to, IT and systems, confidential information, intellectual property, relationships with customers and suppliers, and information gained from customers and/or other sources during the course of business, Firstsource business strategies (all referred to as “**Firstsource Properties**”). Firstsource Property should be protected and employed efficiently to conduct only duly authorized business activities of Firstsource and its clients. Employees shall exercise reasonable care to prevent theft, damage or misuse of Firstsource Property and report suspected/actual theft in a timely and prescribed manner as provided in applicable Firstsource policies.

Using IT systems and email: employees shall use professionally ethical and good judgment when using Firstsource telephones/cell phones, IT systems, software and electronic communication services and devices. Like all Firstsource Property, these are meant for authorized Firstsource business purposes only. Firstsource prohibits the use of personal computers and storage devices, except where expressly authorized as well as downloading, storing and/or using pirated software on Firstsource Property. Employees with access to official email IDs must familiarize themselves with the Dos and Don'ts of corporate business writing, professional etiquette and ensure that the content of the email is professional and in compliance with this Policy. Creating, accessing, storing, printing, soliciting, or sending any material that is false, derogatory, malicious, intimidating, harassing, threatening, abusive, sexually explicit, offensive, or inappropriate is strictly prohibited and in certain cases a criminal offense. Employees are advised to address email communications only to the proper and intended recipients. Notwithstanding the forgoing, nothing herein should be construed as restricting any Firstsource employee from exercising one's rights protected by the provisions under the applicable laws where Firstsource has its presence.

Employees shall not use their official email for personal correspondence and personal email for official correspondence related to Firstsource. The information shared using Firstsource's official email, network and/or system is not private, is accessible by Firstsource and hosted on Firstsource's systems and networks, therefore, all correspondence to and from the Firstsource official email or Firstsource Property is the property of Firstsource. Firstsource reserves the right to monitor and may disclose all electronic and telephonic communication to law enforcement or government officials as and when requested. Accessing illegal websites and content using Firstsource Property is strictly prohibited and is a criminal offense subject to termination.

Standard 1.9 Fiscal responsibility

Firstsource prohibits its employees from activities such as misappropriation of Firstsource funds, forging expense statements, claiming reimbursements with false documentation, claiming Income Tax exemptions on false grounds and any other conduct and/ or activity which is illegal as per applicable laws and/ or breach applicable Firstsource policies.

Employees shall spend Firstsource funds in a responsible manner and as authorized by Firstsource. Improper/unlawful use of Firstsource funds or Firstsource Property, tampering of official documents/data, furnishing forged data/documents is strictly prohibited and will result in disciplinary proceedings, including but not limited to, termination of employment.

Standard 1.10 Confidentiality and Data Privacy

Firstsource Personnel during the course of their employment at Firstsource may have access to (i) confidential or proprietary technical, financial, marketing, manufacturing, distribution, personal, sensitive or other technical or business information or trade secrets of the Company including but not limited to concepts, techniques, processes, methods, systems, designs, clients, circuits, cost data, computer programs, formulae, development or experimental work, work in progress, customers and suppliers as well as software for client relationship management whether in the form of reports, drawings, blueprints, data, notes and other documents and records, whether printed, typed, handwritten, videotaped, transmitted or transcribed on data files or on any type of media; (ii) third party confidential information, clients' and suppliers' confidential information which Firstsource is obligated to treat as confidential; (iii) any data or information regarding Firstsource's employees, prospective employees, employee lists, employee profiles, employee information ("**Personal Data**") (all the above mentioned collectively, **Confidential Information**).

Employees shall not, at any time, directly or indirectly, use, publish, disseminate, or otherwise reveal (or disclose in any manner), any Confidential Information to any third party other than for the purposes of conducting official business of Firstsource. Firstsource Personnel shall also not disclose any Confidential Information to anyone within the Company except on a 'need to know' basis. However, this non-disclosure requirements is not intended to limit an employee's rights to discuss or disclose their wages, as protected by law, or to otherwise restrict or interfere with any right under applicable law, including the National Labor Relations Act (NLRA).

Standard 1.11 Open Communication

Open communication is important in upholding Firstsource's value of concern for people. Communication is as much about listening as it is about speaking. It involves exchanging ideas; sharing accurate and timely information about business issues; and listening to each other and to clients and suppliers. Differing opinions and expressions of concern are respected. Cooperation and trust are necessary in keeping our communication channels open.

While open communication is desired by Firstsource, spreading malicious rumors relating to the operations, activities, and affairs of Firstsource such as the Firstsource transactions, strategy, clients, and financial information, is considered unacceptable behavior that is disruptive and damaging to the Firstsource's plans. Any Firstsource employee found to be engaging in such activities will be strongly dealt with by Firstsource, which may lead to disciplinary action up to and including termination. This is not intended to restrict or interfere with an employee's rights to engage in concerted activity regarding the terms and conditions of their employment, as protected by the National Labor Relations Act.

PRINCIPLE 2: BUSINESS PHILOSOPHY AND ETHICS

Firstsource prides itself as an organization that upholds high standards of business conduct. Ethical business conduct is critical to maintaining goodwill and the brand that Firstsource has created for itself. Employees shall conduct business in a manner that is in accordance with applicable laws and Firstsource policies and uphold Firstsource values when undertaking business transactions with suppliers, clients, government authorities and third parties.

Standard 2.1 Service quality

Firstsource endeavors to provide world-class services to clients and its customers. Employees are expected to ensure that all queries and concerns are resolved within the prescribed timelines.

Employees are responsible for ensuring that the agreed upon service level agreements and turnaround timelines are adhered to.

Standard 2.2 Political activities, representation and contribution

While Employees may exercise their right to participate in political activities, an employee's decision to become actively involved in political activities is purely personal in nature. Firstsource maintains a neutral political stand and does not in any way or form, endorse or oppose any political ideology of any country or state it operates in. Firstsource prohibits employees from supporting any specific political party or candidate on behalf of Firstsource. Firstsource also prohibits receiving or offering (directly or indirectly) remuneration, gifts or making any payments or donations or providing comparable benefits to any political party, political party officials, workers or candidates on its behalf.

Standard 2.3 International business activities

Firstsource endeavors to comply with all applicable laws and regulations of the countries in which it operates. Employees shall display sensitivity to the diverse cultures and business practices prevalent in various regions while interacting with clients, suppliers, and other employees alike. In situations where cultural differences and/or local laws and regulations require an interpretation of Firstsource policies, the Employees shall consult the Human Resource department.

Standard 2.4 Open communication and fair information practices

Authorized and designated Employees shall periodically review and provide information to shareholders in relation to Firstsource's business dealings and transactions. Firstsource mandates such Employees to share data or information that is accurate, authentic and recent. In case the Firstsource Personnel seeks information that is not publicly available, they can raise a grievance under our [Grievance Redressal Policy](#).

Standard 2.5 Relationships with competitors and obtaining competitor information

Firstsource conducts its business in compliance with applicable laws and regulations and strictly prohibits Employees from engaging in illegal practices and illegal activities including any that are detrimental to Firstsource and its competitors. Firstsource also prohibits coercive dealings with competition, insider trading and/ or entering into agreements pertaining to price setting, dividing the customer base, suppliers and/or markets.

When gathering information about competitors, Firstsource prohibits practices that could result in or be perceived as obtaining information inappropriately or illegally (including but not limited to theft, spying, bribery, encouraging breach of Firstsource's competitors' or clients' or suppliers' non-disclosure agreements, procuring confidential information about competitors' business strategy, pricing and/or any factor that impact their business negatively). Employees shall obtain information through honest, ethical, and legal methods and shall not make false or misleading statements about the clients' or competitors' or suppliers' brand, products, services, or employees. If an employee receives sensitive or confidential information on competitors anonymously, the same must be addressed to the Human Resource department immediately.

Standard 2.6 Compliance with anti-bribery and anti-corruption laws

Firstsource has a zero-tolerance policy towards corruption and bribery and prohibits its Employees to offer or receive bribes in the form of gifts and/ or entertainment to and/or from clients, subcontractors, suppliers, government authorities and public officials, third parties, political parties.

Gifts and entertainment to and/ from clients and suppliers are permitted only when in compliance applicable laws and regulations, are not offered or received in consideration or expectation to gain any advantage, are considered customary in accordance with ethical business practices and are within the appropriate values as provided in the Anti-Bribery and Gift and Entertainment Policy of Firstsource.

Standard 2.7 Intellectual property and proprietary information

Employees shall comply with applicable laws and regulations that govern the rights to and the protection of copyrights, trademarks, patents, trade secrets and other forms of intellectual property of Firstsource, its clients and suppliers. Employees shall comply with ethical and legal responsibilities to protect Confidential Information belonging to Firstsource Personnel and its employees, prospective employees, clients, competitors, and suppliers and communicate the same only on a 'need- to-know' basis.

Any intellectual property created by Employees of Firstsource during the discharge of their duties throughout their tenure with Firstsource will be owned by Firstsource if (a) created during the course of their employment with Firstsource; (b) created while using the

Firstsource Properties, infrastructure or other assets which belong to Firstsource; (c) created while using the IP, technical know-how or Confidential Information of Firstsource which was known to the Employee in their capacity of being employed at Firstsource; (d) created in relation to any work which is conducted at the behest of Firstsource.

PRINCIPLE 3: LEGAL AND REGULATORY COMPLIANCE

Employees shall ensure legal and regulatory compliance with the activities performed for or on behalf of Firstsource. Violation of applicable laws and regulations (in letter or in spirit) may subject Firstsource to civil or criminal liability and/or loss of business or reputation, and in turn, may subject the employee and/ or Firstsource Personnel to individual criminal and/or civil liabilities, in addition to disciplinary action by Firstsource. Employees shall direct queries regarding the existence, interpretation or application of any law or regulation to a member of the appropriate Legal Department of that country.

Nothing in this Policy is designed to interfere with, restrain, or prevent employee communications regarding wages, work hours, or other terms and conditions of employment.

Standard 3.1 Statutory and regulatory compliance

Firstsource mandates honest and accurate reporting of business information and strictly prohibits tampering with official documents/data and business information. Employees shall refrain from any conduct that violates any applicable law or regulation and Firstsource policies, such as:

- a. Submission of false, fraudulent or misleading claims to any government entity or third-party payer, including claims for services not rendered, claims which characterize the service differently than the service actually rendered, or claims which do not otherwise comply with applicable program or contractual requirements.
- b. Making false representations to any person or entity to gain or retain participation in a program or to obtain payment for any service.
- c. Misusing sensitive and confidential information pertaining to Firstsource for personal gain or otherwise.

Standard 3.2 Accounting practices and recordkeeping

Firstsource mandates the preparation of its accounts in a fair and accurate manner, in accordance with the accounting and financial reporting standards representing the generally accepted guidelines, principles, standards, laws and regulations of each country that it conducts its business in. Employees shall ensure that the accounting and auditing procedures followed by them accurately reflect Firstsource's business transactions and disposition of assets.

Firstsource assures complete accessibility to the books of accounts to the company's auditors, authorized personnel, and government officials with proper authority. Firstsource strictly prohibits practices such as willful omission of any transaction from the books and records, advance income recognition, hidden bank accounts and funds, etc. Engaging in willful, material misrepresentation or misinformation (irrespective of the amount in question) constitutes violation of the Global Ethics Policy and shall be subject to disciplinary action as well as appropriate civil or criminal action as mandated by the applicable laws and regulations.

Standard 3.3 Tax compliance

Firstsource complies with applicable laws and regulations with respect to direct and indirect tax. Employees in roles with administrative responsibility shall ensure that the requisite taxes, returns, and challans are filed before or within the prescribed time as per law. Employees shall ensure that they are aware of and understand the applicable laws and regulations and comply with them. Any contravention on the part of employees shall constitute a violation of this Policy and other applicable Firstsource policies and shall be subject to disciplinary action, including but not limited to, termination of employment.

Standard 3.4 Insider information and securities trading

Firstsource prohibits the sharing of any material, non-public information about the organization or unpublished price sensitive information on Firstsource's business dealings and the usage or proliferation of such information. Firstsource prohibits employees and Firstsource Personnel from making or giving advice on investment decisions or passing along non-public information about Firstsource to someone who may buy or sell securities. Firstsource strictly prohibits Employees (and their immediate family members) from deriving any benefit or counsel, or assisting others to derive benefit from, access to or possession of non-public information. This information includes (and is not limited to):

- Periodical financial results.
- Intended declaration of dividends (both interim and final)
- Issue of securities or buy-back of securities.
- Any major expansion plans or undertaking of new business.
- Amalgamation, mergers, or takeovers.
- Disposal of the whole or substantial part of the undertaking.
- Any significant changes in policies, plans or operations.
- Important personnel changes.
- Important judicial, legislative, or regulatory actions impacting Firstsource.

In the course of work at Firstsource, employees and Firstsource Personnel may be privy to material non-public information about Firstsource. If this information is considered 'material' (important for an investor in deciding to trade in the public securities of Firstsource), the person who has access to the information is termed as an 'insider'. Insider trading is a criminal offence and involves huge penalties and/or criminal prosecution.

Disclosure of unpublished price sensitive information should only be to those employees within Firstsource who need the information to discharge their duty and/or functions. Firstsource mandates that all files, papers, and records containing unpublished price sensitive information be kept secure and confidential. Keeping in view the extremely sensitive nature of the issue and the severe penalties associated with insider trading, Employees shall contact Firstsource's Company Secretarial team before buying or selling public securities in situations that could be of this nature.

Employees are individually responsible for complying with the provisions of the Securities and Exchange Board of India (SEBI) Prohibition of Insider Trading Regulations, 1992. Any contravention on the part of an employee shall constitute a violation of this Policy and shall be subject to disciplinary action, as well as appropriate civil or criminal action as mandated by SEBI for violation of the above-mentioned regulations.

Standard 3.6 Regulatory investigations, inspections, and inquiries

Employees shall cooperate with regulatory investigations, inspections, and inquiries as and when they take place. However, if any information is sought by any regulatory officer, the employee shall immediately contact the Human Resource team and Legal to understand if such Employee is authorized to share the information sought. While sharing any information with regulatory officers, the Employee shall provide accurate and authentic information.

Standard 3.7 Records on legal hold

Firstsource mandates employees to preserve and protect the necessary records for which they are responsible, in the event of a legal hold due to litigation or government inquiry, or any other instructions from the Legal Department or governmental authority ordering and/or directing same. Destroying, altering, or modifying records or supporting documents that have been placed under legal hold constitutes a violation of this Policy, and shall be subject to disciplinary action which may lead to termination of employment.

PRINCIPLE 4: CONFLICT OF INTEREST

Employees shall act in the best interest of Firstsource and exercise sound business judgment during their tenure at Firstsource.. A conflict of interest in employment arises when a situation that benefits an employee and/ or Firstsource Personnel's personal interests, contradict with the interests of Firstsource. A conflict-of-interest situation is an unwanted circumstance as it may have heavy implications on the Firstsource Personnel's judgement and commitment to Firstsource, and by extension, to the realization of its goals. It is Firstsource Personnel's responsibility to ensure that no business or personal association involves a conflict of interest with Firstsource operations and/or the employee's role within Firstsource.

Standard 4.1 Potential conflicts of interest

A conflict-of-interest situation may arise whenever a Firstsource Personnel's interest in a particular subject may lead them to actions, activities or relationships that undermine Firstsource and may be disadvantageous and detrimental to Firstsource. Employees shall avoid situations involving any actual or potential conflicts of interest with Firstsource. There can be various situations which may be considered a conflict of interest by Firstsource, some examples of which are provided herein:

- (a) Employees soliciting subcontractors and vendors for making donation(s) to/ advertisement(s) to a charity, in which the Employee is involved;
- (b) Taking a part-time and/ or full-time employment elsewhere, requiring the Employee to be engaged during normal working hours of Firstsource;
- (c) Making a favorable decision about a spouse, friend or relative which is not supported or approved or authorized by Firstsource;
- (d) Ability to use their position at Firstsource for their personal advantage or gain;
- (e) Engaging in activities which will bring direct or indirect profit to a competitor;
- (f) Using connections obtained through Firstsource for their personal purposes;
- (g) Using Firstsource Property or means to support an external business; and
- (h) Acting in ways that may compromise Firstsource's security, goodwill and image, such as engaging in giving, accepting or promise to give or accept illegal gratification.

In case of any doubt about the possible conflict of interest, Firstsource expects employees to discuss the situation with their reporting manager or the Human Resource department.

Standard 4.5 Professional associations and directorships

Firstsource encourages memberships and positions of responsibility in educational or professional bodies where such associations benefit Firstsource and the employee and/ or Firstsource Personnel. An employee who is approached by another organization to serve as a non-executive director must obtain necessary approvals from the Head of Human Resource, Managing Director of Firstsource and Chairman of Firstsource's board.

Standard 4.6 Disclosure of conflicts of interest

Employees shall judiciously avoid and resolve real and potential conflict of interests and shall make the required disclosures related to the same. In cases when Firstsource Personnel are unclear, they may discuss the situation with their reporting manager or the Human Resource department.

PRINCIPLE 5: RELATIONSHIPS WITH STAKEHOLDERS

Firstsource is committed to honoring stakeholder commitments and informing each of its stakeholders about relevant aspects of the business. Firstsource mandates professionalism, honesty and integrity when communicating with stakeholders, and strictly prohibits taking unfair advantage through manipulation, concealment and abuse of privileged information, misrepresentation, or any other false practices.

Standard 5.1 Respecting client confidentiality

Firstsource provides services to many clients across the globe. Contractual obligations mandate that Firstsource and its employees protect the identity of certain clients due to the nature of transactions and/or business exigencies. Employees shall not reveal the identity of such clients in writing or in public forums (for instance, revealing client identity in employee resumes is prohibited).

Standard 5.2 Customer focus

Firstsource recognizes the role that its clients and their customers play in ensuring long-term business success. Employees shall deal with all customers in a fair, trustworthy, and honest manner, providing them with accurate, authentic and complete information without any misrepresentation or falsification. Firstsource mandates that employees address customer requirements courteously and ensure complete customer satisfaction, in accordance with Firstsource policies and client guidelines, if any. Firstsource strictly prohibits employees from misusing customer information.

Standard 5.3 Relationships with vendors

Firstsource endeavors to associate itself with vendors who share similar organizational values and professional ethics. Employees, especially those in functions that initiate (and are engaged in) vendor selection must ensure that vendors observe Firstsource's ethical, contractual, professional and compliance requirements as applicable. Employees shall ensure that the suppliers and vendors work within the ambit of law and deal fairly with Firstsource and its stakeholders, while maintaining flexibility and cost competitiveness. Any misconduct or non-compliance to this Policy on the part of the suppliers or vendors must be brought to the attention of the Reporting Manager, Legal or the Human Resources Department. Firstsource strictly prohibits Employees from influencing a supplier or vendor to provide personal service of any kind, and/or obtaining less than market price for such services, without prior notification to Firstsource.

Standard 5.4 Selective disclosure

Firstsource recognizes its stakeholders' need for information about the organization. To ensure that accurate information reaches the intended stakeholder group, Firstsource mandates that only designated employees act as spokespersons on behalf of Firstsource to communicate with the media, the financial community, and shareholders. Employees who are approached by outsiders or the media (or vice versa) must be directed to the Corporate Communications team or gain explicit approval from the Corporate Communications team before revealing any sensitive information or opinion on an event or situation that Firstsource, its competitors or the industry faces (including being featured in radio or television where the employee discloses his/her identity or is identified as an employee of Firstsource). Employees shall ensure that they do not express any opinion or undertake any act that could gain

negative publicity for Firstsource or hurt the goodwill and image of Firstsource. Notwithstanding the forgoing, nothing herein should be construed as restricting any Firstsource employee from exercising their rights protected by the provisions under applicable laws where Firstsource has its business operations.

Appendix 1 – For employees in the United States only:

National Labor Relations Act: National Labor Relations Act: This global ethics policy will be administered in compliance with applicable federal, state and local laws and regulations, including section 7 of the National Labor Relations Act. Nothing in this global ethics policy is designed to interfere with, restrain, or prevent employees from engaging in concerted activities to improve wages, benefits, and working conditions, such as communications regarding wage, hours, or other terms and conditions of employment, and employees have the right to engage in or refrain from such activities.

Fraud, Abuse and Waste:

Firstsource is committed to detecting, correcting, and preventing fraud, abuse and waste and expects its employees and vendors to refrain from conduct that violates any fraud, abuse and waste law or regulation, including, without limitation:

- a. Submission of false, fraudulent or misleading claims to any government entity or third party payer, including claims for services not rendered, claims which characterize the service differently than the service actually rendered (such as up-coding or unbundling), or claims which do not otherwise comply with applicable program or contractual requirements; and
- b. Making false representations to any person or entity to gain or retain participation in a program or to obtain payment for any service.

Any suspicions concerning fraud, abuse or waste must be reported to the Compliance department. Fraud, Abuse and Waste are defined as follows:

"Fraud" means an intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to him or her or some other person. It includes any act that constitutes fraud under applicable Federal or State law in the United States.

"Abuse" means provider practices that are inconsistent with sound fiscal, business, or medical practices, and result in an unnecessary cost to the Medicaid program, or in reimbursement for services that are not medically necessary or that fail to meet professionally recognized standards for health care. It also includes recipient practices that result in unnecessary cost to the Medicaid program.

"Waste" involves the taxpayers not receiving reasonable value for money in connection with any government funded activities due to an inappropriate act or omission by player with control over or access to government resources (e.g., executive, judicial or legislative branch employees, grantees or other recipients). "Waste goes beyond fraud and abuse and most waste does not involve a violation of law. Waste relates primarily to mismanagement, inappropriate actions and inadequate oversight." - From the Inspector General.

False Claim Act:

The False Claims Act, also called the "Lincoln Law", is a federal law which allows people who are not affiliated with the government to file "whistleblower" lawsuits on behalf of the government against individuals or companies that are defrauding the government. These lawsuits are also called "qui tam" lawsuits.

False Claim Act would apply to those individuals or business who:

- a. knowingly presents a false or fraudulent claim for payment or approval.
- b. knowingly makes, uses, or causes to be made or used, a false record or statement material to a false or fraudulent claim
- c. has possession, custody, or control of property or money used, or to be used, by the government and knowingly delivers, or causes to be delivered, less than all that money or property,
- d. is authorized to make or deliver a document certifying receipt of property used, or to be used, by the government and, intending to defraud the government, makes or delivers the receipt without completely knowing that the information on the receipt is true,
- e. knowingly buys or receives as a pledge of an obligation or debt, public property from an officer or employee of the government, or a member of the Armed Forces, who lawfully may not sell or pledge property.
- f. knowingly makes, uses, or causes to be made or used, a false record or statement material to an obligation to pay or transmit money or property to the government, or knowingly conceals or knowingly and improperly avoids or decreases an obligation to pay or transmit money or property to the government, or
- g. conspires to commit a violation of one of the above.

Many states have adopted some variation of the Federal False Claims Act. Please reach out to your Legal department for information regarding specific states.

Options for reporting: For North America businesses:

Compliance Hotline: 1-877-800-3391.

Email: compliance@na.firstsource.com

Web Portal Reporting: mai.mycompliancereport.com

Legal contacts:

For Firstsource Group USA, Inc.; Firstsource Solutions USA, LLC; Firstsource Health Plans and Healthcare Services, LLC; and American Recovery Service Inc. (ARSI); Firstsource Group USA, Firstsource Solutions USA, Stonehill Group, Inc.; Sourcepoint Inc. and Sourcepoint Fulfillment Services, Inc.

Kristi Christian: Kristi.christian@firstsource.com

For Firstsource Advantage, LLC, and One Advantage, LLC, Non-Healthcare Collections business:

James Duke: james.duke@na.firstsource.com