

US WORKPLACE BULLYING POLICY

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INTRODUCTION

Firstsource is committed to providing a work environment free from all forms workplace bullying and retaliation, regardless of whether considered unlawful under federal, state or local law.

Scope

This zero tolerance policy applies across all entities affiliated within Firstsource in the United States, including Firstsource Group USA, Inc., its successors and assigns. These companies currently include, but are not limited to: Firstsource Advantage, LLC, American Recovery Service, Inc. (“ARSI”), Firstsource Health Plans and Healthcare Services, LLC, Firstsource Solutions USA, LLC, One Advantage, LLC, Sourcepoint, Inc., Stonehill Group, Inc., and Sourcepoint Fulfillment Services, Inc. Collectively, they are referred to throughout this handbook as “Firstsource” or “the Company,” and include the specific entity by which you are employed (“employing entity”).

This policy applies to all individuals interacting with Firstsource, including applicants for employment, employees, consultants, interns (paid or unpaid), clients, visitors, suppliers, vendors and business partners. This policy applies not only to the workplace during normal hours of operation, but also to all work-related activities and functions, both on and off company premises. Such activities and functions may be conducted in person, over the phone, in writing, or through electronic communications, such as email, text messages, social media postings, Teams chats and virtual meetings.

Disclaimer

Nothing in this policy is intended to interfere with, restrain or prevent concerted activities by employees relating to their wages, hours or terms and conditions of their employment, or any other conduct protected by Section 7 of the National Labor Relations Act (“NLRA”). Under Section 7 of the NLRA, employees have the following rights:

- To self-organize, form, join, or assist labor organizations
- To bargain collectively through their chosen representatives
- To engage in other concerted activities for the purpose of collective bargaining or other mutual aid or protection
- To refrain from any or all such activities

For example, employees retain the right to discuss the terms and conditions of their employment (i.e., pay, benefits, policies, work rules, etc.) and discuss internal investigations. Nothing in this handbook is intended to interfere with, restrain or prevent these rights. Employees also have the right to refrain from such protected activities.

Employee concerns or complaints related to a violation of their NLRA rights by any representative of Firstsource may be submitted to whistle.blowing@firstsource.com.

State and Local Laws

This policy was created with a focus on the rules and information generally applicable to all individuals within the United States. However, you may have additional rights and/or obligations under state or local law based on your location. This policy is not intended to infringe on, impede or restrict state or local law.

POLICY

Prohibited Conduct

Workplace bullying is a form of harassment and refers to an ongoing pattern or repeated behavior of mistreatment of a particular person or group, which is meant to harm or make them feel powerless to respond. Victims of workplace bullying can experience significant physical, mental and/or emotional harm. Even if not based on a protected characteristic and prohibited by law, workplace bullying is contrary to our values and, thus, prohibited under this policy.

Prohibited workplace bullying can come in many forms, including but not limited to the following communications when threatening, insulting or humiliating:

- **Written:** Notes, pictures, photos and other hardcopy forms
- **Verbal:** Ridiculing or badmouthing; name-calling, insulting; making an individual the object of jokes; and making abusive or offensive remarks to or about another, even outside of their presence
- **Physical:** Pushing, shoving, kicking, poking or tripping; throwing objects; displaying physical threats; committing assault; and damaging property
- **Gestures:** Making facial expressions, making sounds, leering and hand-gesturing
- **Electronic:** Sending content through email, text, Teams chat or direct messages; posting pictures or videos online; 'tagging' individuals through social media; and other electronic transmissions, whether directly to the individual or in a group setting
- **Exclusion:** Ignoring, excluding or disregarding an employee in work-related activities

Reports and Complaints

All employees are responsible for complying with this policy and are encouraged to contact their HR Business Partner with any questions, concerns or complaints. Reports by employees or supervisors may also be submitted directly to USHR.Compliance@firstsource.com.

Investigations

US HR has the authority for investigating potential violations of this policy. Reports will be promptly investigated in as discrete a manner as possible. Confidentiality will be maintained to the extent reasonably possible to conduct a thorough investigation.

Non-Retaliation

This policy does not prohibit employees from discussing their workplace concerns or complaints with their co-workers and no retaliation will be taken against employees who exercise their rights to discuss issues with their co-workers. Retaliation of any kind against a person for submitting a complaint in good faith or cooperating in an investigation is strictly prohibited.

Violations

Violations of this policy will be subject to corrective action, up to and including termination of employment.