

Grievance Redressal Process for Complaints on Misleading Advertisements, Delivery of Essential Services, Unfair and Restrictive Trade Practices

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1. Definitions

Sl. No.	Defined Term	Definition
1	Applicable Law(s)	All applicable laws governing misleading advertisements, restrictive and unfair trade practices in all countries where Firstsource has its presence and/ or is conducting business from.
2	Client	Means the entity to whom Firstsource provides good and / or services
3	Delivery of Essential Services/ Essential Services	Industries defined as essential services by a particular government of a country, which are established to ensure the delivery of certain services, which if obstructed would affect the normal lives of citizens and people. Services considered to be essential generally include (without limitation) services such as hospitals and other healthcare, utilities such as electricity, water supply, law enforcement, firefighting, and food services.
4	Firstsource Personnel	All Firstsource employees, officers, apprentices, trainees and interns.
5	Misleading Advertisements	An advertisement in any form of mass media (including but not limited to print media, commercials, websites, social media) which is misleading, has false or deceptive information, if information has been concealed or left out, and also covers all kinds of false claims made to customers by the seller of goods and/ or services.
6	Restrictive Trade Practices	A trade practice which has the effect of preventing, distorting or restricting competition and includes practices which tend to obstruct the flow of capital or resources into the stream of production and agreements between parties that are not considered to be in public interest.
7	Third Party/ies	Any individual or organization who or which comes into contact with Firstsource Personnel during the course of business and includes, inter alia, potential contractors, business partners, joint venture partners, Clients, advisers, intermediaries, subcontractors
8	Unfair Trade Practices	Any fraudulent, dishonest trade practice or business practice which is prohibited by a statute. The practices include without limitation, the use of various deceptive, fraudulent, or unethical methods to obtain business, gain an advantage, or turn a profit by misrepresentation, false advertising or misrepresentation of goods and/ or services, deceptive pricing, non-compliance with Applicable Laws and all engaging in trade practices which are not considered to be in public interest.
9	Vendor/s	All individual proprietary concerns, companies, firms, non-profit organizations, agents and representatives with whom Firstsource has a contractual relationship for procurement of goods and/ or services either for itself or for provision of services to its customers / Clients

2. Introduction and Purpose

Firstsource is a listed company in India and is registered under the Indian Companies Act, 1956 with subsidiaries across the globe. Firstsource services global clients in Banking, Telecom, Healthcare, Utility, Media and Insurance business segments and believes in the highest standards of governance, ethics and compliance. Because of its global presence and business complexity, Firstsource is exposed to a plethora of laws and regulations to conduct its business in a fair and just manner and in compliance with the provisions of applicable laws which govern the markets.

The purpose of this Grievance Redressal Process for Complaints on Misleading Advertisements, Delivery of Essential Services, Restrictive and Unfair Trade Practices document's ("**Process Document**") is to lay down a process for reporting all grievances against Firstsource, related to Misleading Advertisements, Delivery of Essential Services, Restrictive Trade Practices and Unfair Trade Practices ("**Grievances**") so that all Grievances reported are addressed in a fair, timely and consistent manner in accordance with Firstsource policies.

Grievances are concerns, issues or complaints raised by any Firstsource Personnel, Client, Vendor, Third Party ("**Aggrieved Person**").

3. Process to raise Grievance:

The following is the process to raise a Grievance by an Aggrieved Person:

The Aggrieved Person can raise their grievances by writing into GRS@firstsource.com.

Upon receiving of the Grievance, the person investigating the Grievance will identify the type of Grievance and route the Grievance to the respective point of contact as mentioned in the table below:

Type of Grievance	Point of Contact	Geography
Misleading Advertising	VP - Marketing	Global
Delivery of Essential Services	Chief Operating Officer	Global
Restrictive Trade Practices and Unfair Trade Practices	VP - Legal & Compliance (India & Philippines)	India, Philippines, UK
	SVP - Head of Legal & Compliance (US)	US, Canada, Mexico

In addition, any Firstsource Personnel raising a Grievance may do so in writing on the FirstConnect Tool available at <https://firstconnect.firstsource.com/firstConnect/GRSLogin.aspx>, along with all necessary details including but not limited to the nature of the Grievance and any supporting documents if relevant or available.

4. Confidentiality and Data Privacy

Firstsource is committed to ensuring that no one suffers detrimental treatment for reporting any Grievance. All Grievances reported will be treated as confidential. The Aggrieved Person can choose to be anonymous, and their identity shall not be disclosed by Firstsource, except to those persons who are directly involved in the investigation concerning the Grievance. Any Aggrieved Person can report concerns in confidence and without fear of retribution. Appropriate action will be taken against the individuals proven to be involved in any attempted retribution. Firstsource will also ensure to address the Grievances in accordance with applicable laws and Firstsource policies.

5. Appeal

If an Aggrieved Person is of the opinion that their Grievance has not been satisfactorily addressed by Firstsource within reasonable time, they can write to whistle.blowing@firstsource.com.

6. Reporting

India Legal & Compliance Department will reach out to the points of contact mentioned in the table above on a quarterly basis, within the first week of the month following the quarter-end for details of Grievances received for the quarter being reported, along with the then-current status of addressing and/ or redressing such Grievances. It is the responsibility of the aforesaid point of contacts to provide details of all Grievances received, along with current status for the quarter being reported, within the second week of the month following the quarter-end, in the template provided to them by the India Legal & Compliance Department.

Please note this Process Document is neither a policy nor a contractual document and may be amended in line with changes in business needs and Firstsource policies.

Annexure 1

Template for Reporting Grievance Redressal

India Legal & Compliance Department will collate the details of Grievances received for the quarter in the following format:



Template for
Reporting Grievance f