

US Anti-Harassment and Non-Discrimination Policy

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Introduction

Firstsource is committed to providing a work environment free of harassment, discrimination, and retaliation. In furtherance of this commitment, Firstsource strictly prohibits all forms of discrimination and harassment based on any protected characteristic under federal, state or local law.

Scope

This 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.

This policy is not intended to prevent employees from discussing their work conditions or otherwise engaging in activity protected under the National Labor Relations Act (NLRA).

State and Local Laws

This policy was created with a focus on 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.

Prohibited Conduct

Firstsource is committed to providing a work environment free of harassment, discrimination, and retaliation. In furtherance of this commitment, the Company strictly prohibits all forms of discrimination and harassment based on any protected characteristic, including but not limited to, race, color, religion, national origin, age, sex (including pregnancy, childbirth and related conditions), gender identity and sexual orientation, disability, status as a protected veteran, genetic information

(including family medical history), and any other protected characteristic under federal, state or local law.

Harassment

Prohibited harassment includes any unwelcome behavior that is abusive, threatening, intimidating, humiliating, or degrading to another individual. Harassment can be verbal, written, visual, or physical. When based on an individual's protected equal employment opportunity characteristic, the harassment becomes unlawful.

This zero-tolerance 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.

Sexual Harassment

Sexual harassment is a form of sex discrimination and unlawful harassment under this policy. Sexual harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when this conduct explicitly or implicitly affects an individual's employment, unreasonably interferes with an individual's work performance, or creates a hostile work environment.

Sexual harassment is not required to be of a sexual nature, however, and can include inappropriate remarks about a person's gender, sexual orientation, or gender identity. For example, harassing a woman by making comments about women in general can constitute illegal sexual harassment. Sexual harassment can be committed by both men and women and can be directed toward someone of a different sex or the same sex.

Examples of other conduct which may constitute sexual harassment include, but are not limited to:

- **Verbal:** Sexual innuendos, comments, insults, and jokes about sex, anatomy, or gender-specific traits, sexual propositions, repeated requests for dates, or statements about other employees, even outside of their presence.
- **Non-Verbal:** Suggestive or insulting sounds, leering and obscene gestures.
- **Visual:** Posters or displays of sexually explicit materials or websites.
- **Physical:** Unwelcome touching or actual assault.
- **Electronic:** Electronically sending or posting messages, pictures or videos with prohibited content.

The most severe and overt forms of sexual harassment are easier to determine. On the other end of the spectrum, some sexual harassment is more subtle and depends, to some extent, on individual

perception and interpretation. Sexual harassment is assessed by a standard of what would offend a "reasonable person."

Types of Sexual Harassment

The two types of unlawful sexual harassment are quid pro quo and hostile work environment:

- 1) **Quid pro quo:** "This for that." This means that a supervisor may not tell a subordinate that in order for them to receive a promotion, raise, preferred assignment, or other type of job benefit – or to avoid something negative like discipline or an unpleasant assignment – the subordinate must do something sexual in return.
- 2) **Hostile work environment:** A hostile work environment may occur when unwelcome sexual advances, requests for sexual favors, or any conduct of a sexual nature has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Supervisor Responsibilities

Team leads, supervisors and frontline management (collectively referred to as "supervisors") are the first line of defense and are responsible for maintaining a harassment-free workplace. A supervisor who observes or becomes aware of any incident of discrimination or harassment is obligated to notify Human Resources. This includes reports of behavior even when the individual does not want to make a formal complaint. Supervisors are also responsible for enforcing this policy and notifying Human Resources immediately in the event they witness or become aware of any violation of this policy. Supervisors are also required to ensure no retaliation against anyone for reporting inappropriate behavior or for cooperating in an investigation.

Questions and Complaints

Any individual who has experienced or observed any kind of harassment or discrimination by anyone in the workplace should feel free to ask the person to stop at once if they feel comfortable doing so. All employees are responsible for complying with this policy and are encouraged to contact management with any questions, concerns or complaints. Reports by employees and supervisors may also be submitted to USHR.Compliance@firstsource.com or can be submitted through the Firstsource Compliance Hotline at **1-877-800-3391**.

Investigations and Violations

Human Resources has the overall authority for enforcing this policy and investigating violations. 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.

Anyone found to have violated this policy will be subject to disciplinary action, up to and including termination of employment. Violations may include participating in, encouraging, ignoring and failing to report prohibited conduct of which they had direct knowledge.

Additional Reporting

The Civil Rights Act of 1964 prohibits harassment or discrimination against any federally protected characteristic or category and is enforced by the Equal Employment Opportunity Commission (EEOC). Employees also have the right to file a complaint directly with the EEOC. More information is available at www.eeoc.gov. You do not need an attorney and there is no cost to file a complaint with the EEOC.

Remedies for victims can include compensatory and punitive damages, such as paying victims for out-of-pocket expenses caused by the discrimination (such as costs associated with a job search or medical expenses) and compensating them for any emotional harm suffered (such as mental anguish, inconvenience, or loss of enjoyment of life).

Prohibited Retaliation

Retaliation of any kind against any person for opposing unlawful practices, for filing a complaint or otherwise cooperating in an investigation or proceeding is strictly prohibited. Any employee who engages in retaliation against another will be subject to disciplinary action, up to and including termination of employment. Supervisors must promptly notify Human Resources of any retaliatory conduct either observed or brought to their attention.