

US Workplace Bullying Policy

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Introduction

Firstsource is committed to providing a work environment free of workplace bullying and retaliation, regardless of whether considered unlawful 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 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.

Prohibited Conduct

Workplace bullying is a form of harassment and refers to an ongoing pattern of behavior involving repeated mistreatment of a particular person or group, which is meant to harm someone who feels powerless to respond. Victims of workplace bullying experience significant physical and mental health problems. 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:

- **Verbal** – slandering, ridiculing, or badmouthing an individual or their family; offensive name-calling, insulting, or humiliating; using an individual as the object of jokes; abusive and offensive remarks directed to or about an individual.
- **Physical** – pushing, shoving, kicking, poking, tripping, assaulting, or threatening physical assault to a person or damaging their property.
- **Gestures** – non-verbal gestures or glances conveying threatening, suggestive, or offensive messages.
- **Exclusion** – socially or physically excluding or disregarding a person in work-related activities.

Complaints and Investigations

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

Reports will be promptly investigated in as discrete a manner as possible, maintaining confidentiality to the extent reasonably possible. Retaliation of any kind against a person for submitting a complaint in good faith or cooperating in an investigation is strictly prohibited.

Violations

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.