

# US ANTI-HARASSMENT AND NON-DISCRIMINATION POLICY

<b>Master List Ref</b>	<b>Initial Release Date</b> July 2022	<b>Review Date</b> August 2024	<b>Next Review Date</b> July 2025
<b>Version:</b> 2.0	<b>Author</b> HR Compliance Lead	<b>Reviewed by</b> Legal	<b>Approved by</b> Head of HR - US

This document is the sole property of Firstsource Group USA, Inc., its affiliates, successors and assigns. Any use or duplication of this document without express permission of Firstsource Group USA is strictly forbidden and illegal.

## Table of Contents

Introduction .....	2
Scope .....	2
Disclaimer.....	2
State and Local Laws .....	2
Prohibited Conduct .....	3
Harassment.....	3
Sexual Harassment.....	3
Supervisor Responsibilities.....	4
Reporting Complaints .....	4
Investigations and Violations .....	4
Additional Reporting.....	5
Prohibited Retaliation.....	5

## 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 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”). Employees also have the right to engage in or refrain from such protected activities.

## 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

## Harassment

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

Examples of prohibited harassment include, but are not limited to:

- Slurs, insults or offensive remarks
- Jokes or teasing
- Mocking or ridiculing another's religious or cultural beliefs, practices, or manner of dress
- Menacing behavior or "horseplay"

## Sexual Harassment

Sexual harassment is an unlawful form of sex discrimination. 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 offensive 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:

- **Written:** Handwritten or printed notes and other communications in hardcopy form
- **Verbal:** Sexual innuendos; comments, insults, or jokes about sex, anatomy, or gender-specific traits; sexual propositions or requests for sexual favors; repeated requests for dates; and similar conduct about other employees, even outside of their presence
- **Non-Verbal:** Obscene sounds, leering, gesturing and other physical conduct
- **Visual:** Posters, pictures, clothing and other displays with explicit or sexually offensive content
- **Physical:** Unwelcomed touching, actual assault and any other physical contact
- **Electronic:** Sending or requesting content through email, text, application chats or direct messages; posting explicit pictures or videos online; 'tagging' individuals through social media; and other electronic transmissions, whether directly to the individual or in a group setting

The most severe forms of sexual harassment are easier to identify. However, some sexual harassment can be 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."

Unlawful sexual harassment falls into two (2) categories:

- 1) **Quid Pro Quo:** "This for that." This occurs when a supervisor uses a promotion, raise, preferred assignment or other job benefit, or promises to prevent something negative from happening (e.g., corrective action, unpleasant assignment, etc.) to entice their direct report to provide a sexual favor.
- 2) **Hostile Work Environment:** This occurs when unwelcome sexual advances, conduct or other activity has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

## SUPERVISOR RESPONSIBILITIES

Supervisors, managers and executive team members (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 must promptly notify their HR Business Partner or HR Compliance, regardless of whether the alleged victim wants to make a formal complaint or requests anonymity. Supervisors are also required to ensure no retaliation against anyone for submitting a report or cooperating in an investigation.

## REPORTING COMPLAINTS

Firstsource cannot help resolve problems unless we know about them. All employees are responsible for promptly reporting concerns so appropriate corrective measures can be taken. Firstsource takes all complaints of harassment and discrimination seriously.

Any individual who has experienced or observed any kind of harassment or discrimination by anyone in the workplace should immediately report the behavior to HR Business Partner. Complaints may also be submitted directly to [USHR.Compliance@firstsource.com](mailto:USHR.Compliance@firstsource.com) or through the Compliance Hotline at **1-877-800-3391**.

## INVESTIGATIONS AND VIOLATIONS

Human Resources has the overall authority for enforcing this policy and conducting internal investigations on behalf of the Company. 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. However, 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.

Violations of this policy will result in disciplinary action, up to and including termination of employment.

## 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](http://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 or adverse employment action of any kind against any person who opposes an unlawful practice, files a complaint or cooperates in an investigation is strictly prohibited. Prohibited retaliation can include, but is not limited to:

- Confronting or questioning an individual about their complaint or participation an investigation, regardless of the intent to apologize
- Harassing, bullying or intimidating
- Imposing corrective action or downgrading a performance review
- Firing, demoting or transferring
- Changing an employee's position, work schedule or location
- Reducing an employee's hours or refusing overtime opportunities

Retaliation must be reported to the HR Business Partner or HR Compliance promptly. An employee who engages in retaliation against another will be subject to corrective action, up to and including termination of employment.