

Version Number	1.8
Current Policy Effective Date	16-Mar-2026
Process Owner	CRO
Applicability	This Policy is applicable to all employees including officers, directors, employees, visitors, suppliers, contract labor, apprentices, agents, and representatives of Mphasis, and or any third party with whom an employee may have to interact with or in connection with employment in Mphasis. However, women employees in India would be covered under the India POSH policy.

Objective:

Mphasis is committed to ensuring a workplace free from sexual harassment and providing a mechanism for redressal of complaints of sexual harassment without fear or threat of reprisals in any form or manner. As a Hi-Trust company, we walk the talk. Mphasis has zero tolerance for sexual harassment. Mphasis is aware that sexual harassment can occur and when reported, it is committed to redressal such cases.

The POSH (Prevention of Sexual Harassment) policy implemented by Mphasis is reformatory in nature and is well aligned with the HR's Progressive Disciplinary Action Process (PDAP).

Note: This Global POSH Policy applies to all employees except women employees in India (The India POSH policy applies for them). This policy is also applicable to sub-contract workers, vendors, clients, and all stakeholders who engage with Mphasis.

Compliance to Global Laws: Being a company with footprint across the globe, this Policy for Prevention of Sexual Harassment ("the Policy") will comply with the applicable law requirements of countries in which the Company operates.

Path – *MphasisHub* > *Policy Documents* > *HR Corner* > *Corporate policies* > *POSH*

Scope and Applicability:

This policy applies to all Mphasis employees (except women employees in India) and is drafted to comply with all local laws and regulations for each of Mphasis' offices across the world. However, if there is an inconsistency or discrepancy between this policy and the local law, the law of the land in which an employee is located is applicable. This Policy is applicable to all employees, including officers, directors, employees, visitors, suppliers, contract labor, apprentices, agents, and representatives of Mphasis, and or any third party with whom an employee may have to interact with or in connection with employment in Mphasis. However, women employees in India would be covered under the India POSH policy.

This Policy is applicable to Mphasis Limited and its subsidiary, affiliate and or group companies ("Mphasis").

Definitions

1. Sexual harassment is generally defined as unwanted sexual advances, or visual, verbal, or physical conduct of a sexual nature or because of a person's sex. This definition includes many forms of offensive behavior and includes gender and sexuality-based harassment -. The following is an indicative list of violations:

- Unwanted sexual advances.
- Making or threatening reprisals after a negative response to sexual advances.
- Visual conduct: leering, making sexual gestures, displaying of suggestive objects or pictures, cartoon, or posters of sexual nature.
- Verbal conduct: making or using derogatory comments, epithets, slurs, and jokes.
- Physical harassment such as assault, touching, impeding, or blocking movement, or any physical interference with normal work or movement.
- Verbal sexual advances or propositions.
- Verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, suggestive, or obscene letters, notes, or invitations.
- Insults or taunts of a sexual nature.
- Intrusive questions or statements about a person's private life.
- Inappropriate advances on social networking sites.
- Accessing sexually explicit internet sites which creates hostile work environment.
- Stalking.

Quid Pro Quo – When submission to or rejection of “unwelcome” sexual advances or conduct of sexual nature is used as the basis for employment decisions, it is termed as “Quid Pro Quo”.

Hostile Work Environment – Occurs when the conduct unreasonably interferes with an individual's work performance or creates an intimidating or offensive working environment.

2. Workplace - The workplace in the context of sexual harassment is not restricted to the office premises such as cubicles, conference rooms, lobbies etc. It includes the extended workplace such as food courts cafeterias and other recreational facilities provided by the company, company provided transport and work-related travel, company sponsored Training programs, parties, and other events. Additionally, the workplace includes employee remote workspace and any company provided virtual platforms like Skype, Microsoft teams, Yammer, Webex, Zoom, etc.

3. Process of addressing complaint: Complaints received will be dealt in compliance to the local law requirements.

Core Principles of POSH Policy

The Core Values are the guiding principles to be followed by all stakeholders in the implementation of the POSH policy. The acronym (for easy recall) of the POSH Principles is CONCERN. This has been detailed below:

C	• Confidentiality to the extent that is possible pursuant to the local law will be ensured that information related to POSH complaints and disciplinary process is shared with discretion and only on a "need to know" basis.
O	• Objectivity to keep focus on evidence and to be unbiased in the handling of all aspects of an investigation.
N	• Neutrality to treat all the stakeholders equally irrespective of age, gender, caste, language, race, region of origin, religion, level in the organization etc.
C	• Closure to provide speedy conclusion to the investigation of cases with appropriate sharing of information with all relevant parties.
E	• Empathy to be sensitive to the experiences of all the stakeholders and ability to understand what the person has gone through.
R	• Responsiveness to treat all cases as important and urgent and commit to resolve every grievance.
N	• Follow Principles of Natural Justice while investigating a grievance.

Employees' Roles & Responsibilities

- Any employee who feels or believes that he or she has been subjected to or has witnessed sexual harassment in the workplace, shall report the same to posh@mphasis.com.
- If complaints of sexual harassment are submitted to or received by colleagues, leaders, managers or the concerned HRBPs; those complaints shall be forwarded immediately to posh@mphasis.com. Maintaining confidentiality of such complaints will be the personal responsibility of the concerned person who has received or submitted a POSH complaint. It is important to emphasize that regardless of the avenue used to report complaints or participate in the process employees will not be retaliated against in any way.

Harassment by Third Parties

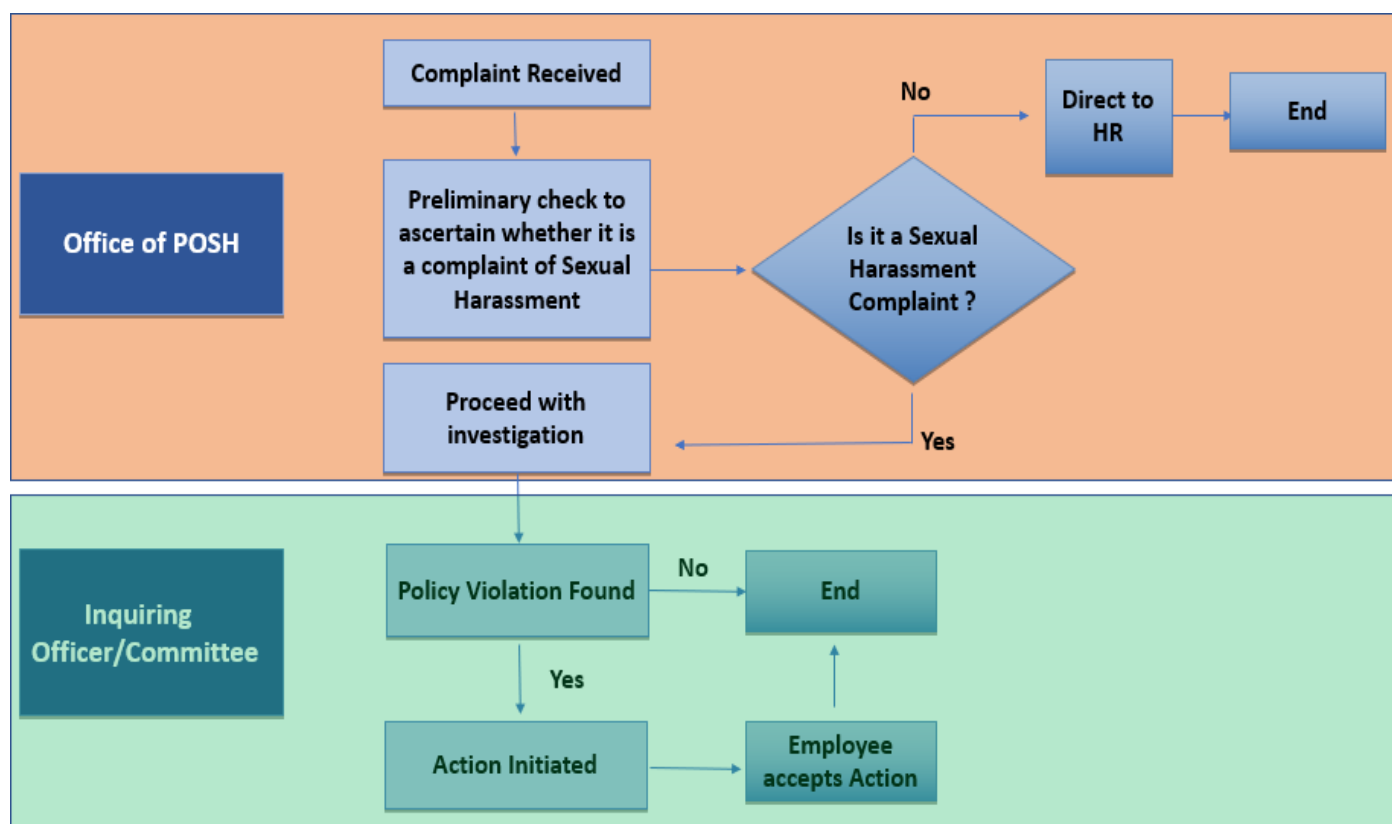
Instances of harassment if any, committed by third parties (contractors, visitors, etc.) will also be intimated to POSH office which will take appropriate action either through existing policies or take appropriate legal steps.

Process/Procedure in case of a Complaint of Sexual Harassment

- An employee who is aggrieved by any conduct / behavior or is witness to or privy to information that he / she believes is an act of sexual harassment is entitled / required to submit a complaint forthwith in writing to posh@mphasis.com or call on +91 9538188838. The said complaint should contain all necessary details/information that the complainant has or is aware of.
- Upon receipt of the complaint, the POSH Office shall verify the nature of complaint and collect essential details necessary for initiating the inquiry procedures.
- Such inquiry proceedings will be in compliance with the Principles of Natural Justice and shall be completed as soon as practical and generally no longer than a period of 30 days.
- Where the Inquiring Officer / Committee determines violation of Mphasis Policies (including this globally applicable POSH policy), necessary actions as mentioned below (and where allowed under applicable law) may be taken on the respondent after taking into consideration the outcome of the investigation and severity of the violation:

- a. Tendering written apology
 - b. Issuance of warning letter
 - c. Reprimand or censure
 - d. Undergoing counselling session
 - e. Carrying out community service
 - f. Transfer to other locations
 - g. Withholding of promotion / salary hikes/increments etc.
 - h. Compensation to the Aggrieved Woman by making appropriate deductions from the salary or wages of the Respondent
5. Adequate steps shall be taken to ensure there is no retaliation against the complainant.
 6. Mala fide complaints of sexual harassment amount to misconduct for which disciplinary action could be taken against the complainant. When it is concluded that the allegation is malicious or the complainant or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take actions against the Complainant pursuant to Company policy / practices.
 7. Escalation process as applicable in the local jurisdiction will be followed.
 8. The contents of the complaint made, the identity and addresses of the complainant, harasser and witnesses, any information relating to the inquiry proceedings and action taken by the employer shall not be published, communicated, or made known to the public, press and media in any manner unless otherwise required by law. Any person contravenes the above, the employer may, as permitted in the jurisdiction where such an act occurred, levy financial penalty as well as take any other disciplinary action as appropriate.

POSH PROCESS FLOW CHART



ADDENDUM:

Global POSH Addendum – Costa Rica

Política Laboral contra el Hostigamiento o Acoso Sexual Se establece la siguiente Política Laboral contra el Hostigamiento Sexual en la compañía Mphasis Costa Rica, en adelante La Compañía regulación que se regirá por las siguientes condiciones: Sección I Normas de Acatamiento General Artículo 1: Objetivo. Mphasis se compromete a garantizar un lugar de trabajo libre de acoso sexual y a proporcionar un mecanismo de reparación de las denuncias de acoso sexual sin temor de represalias de ningún tipo para el denunciante de buena fe. Como empresa Hi-Trust, predicamos con el ejemplo. Mphasis tiene tolerancia cero para el acoso sexual. Mphasis es consciente de que el acoso sexual puede ocurrir y cuando se denuncia, se compromete a tramitar estos casos con total seriedad. De conformidad con lo dispuesto por la Ley No. 7476 del 3 de febrero de 1995, Ley contra el Hostigamiento Sexual en el Empleo y la Docencia, reformada mediante Ley No. 8805 del 28 de abril de 2010, se prohíbe y se sanciona en la Compañía el acoso u hostigamiento sexual, en contra de la dignidad de la mujer y del hombre en las relaciones laborales, de acuerdo con la normativa establecida en esta política.	Employment Policy Against Harassment or Sexual Harassment The following Labor Policy against Sexual Harassment is established in Mphasis Costa Rica, hereinafter referred to as the Company, regulation that will be governed by the following conditions: Section I General Compliance Standards Article 1: Objective. Mphasis is committed to ensuring a workplace free from sexual harassment and providing a mechanism for redressal of complaints of sexual harassment without fear of reprisals in any form or manner against the employee who submits a claim in good faith. As a Hi-Trust company, we walk the talk. Mphasis has zero tolerance for sexual harassment. Mphasis is aware that sexual harassment can occur and when reported, it is committed to act with total seriousness. In accordance with the provisions of Law No. 7476 of February 3, 1995, Law against Sexual Harassment in Employment and Teaching, as amended by Law No. 8805 of April 28, 2010, sexual harassment, or harassment against the dignity of women and men in employment relations is prohibited in and sanctioned by the Company. In accordance with the regulations set forth in this policy.
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Artículo 2: Definición. Se entiende por acoso u hostigamiento sexual, toda conducta sexual visual, verbal, escrita o física indeseada por quien la recibe, reiterada y que provoque efectos perjudiciales en los siguientes casos:

- Condiciones materiales de empleo.
- Desempeño y cumplimiento laboral.
- Estado general de bienestar personal.

También se considera acoso sexual la conducta grave que, habiendo ocurrido una sola vez, perjudique a la víctima en cualquiera de los aspectos indicados.

Artículo 3: Manifestaciones. El acoso sexual puede manifestarse por medio de los siguientes comportamientos:

- Requerimientos de favores sexuales que impliquen: Promesa, implícita o expresa, de un trato preferencial respecto de la situación de empleo, actual o futura, de quien la reciba.
- Amenazas, implícitas o expresas, físicas o morales, de daños o castigos referidos a la situación de empleo, actual o futura, de quien las reciba.
- Exigencia de una conducta cuya sujeción o rechazo sea, en forma implícita o explícita, condición para el empleo.
- Uso de palabras de naturaleza sexual, escritas u orales, que resulten hostiles, humillantes u ofensivas para quien las reciba.
- Acercamientos corporales u otras conductas físicas de naturaleza sexual, indeseadas u ofensivas para quien las reciba.

Las manifestaciones anteriores no limitan la posibilidad de aplicar esta política en caso de que se cometa de forma no deseada otra conducta de naturaleza sexual contra una víctima.
Las anteriores manifestaciones se valorarán independientemente de la naturaleza y/o jerarquía de la relación o vínculo entre las partes,

Article 2: Definition. Sexual harassment is understood to be any visual, verbal, written, or physical sexual conduct that is unwanted by the recipient, repeated and that causes harmful effects in the following cases:

- Material conditions of employment.
- Labor Performance & Compliance.
- General state of personal well-being.

Sexual harassment is also considered to be serious conduct that, having occurred only once, harms the victim in any of the above aspects.

Article 3: Manifestations. Sexual harassment can manifest itself through the following behaviors:

- Requests for sexual favors involving: Promise, implied or express, of preferential treatment with respect to the current or future employment status of the recipient.
- Threats, implicit or express, physical, or moral, of damages or punishments related to the current or future employment situation of the person receiving them.
- Requirement of conduct whose subjection or rejection is, implicitly or explicitly, a condition of employment.
- Use of words of a sexual nature, written or oral, that are hostile, humiliating, or offensive to the recipient.
- Bodily approaches or other physical conduct of a sexual nature, unwanted or offensive to the recipient.

The above manifestations do not limit the possibility of applying this policy in case another sexual nature conduct is unwantedly committed against a victim.
The above statements will be assessed regardless of the nature and/or hierarchy of the relationship or bond between the parties, and the sexual background and/or preferences of any of them.

y de los antecedentes y/o preferencias sexuales de cualquiera de ellas.

Artículo 4. Obligaciones de la Compañía y medios de prevención.

La Compañía reconoce la importancia de implementar procesos efectivos para la prevención y sanción del hostigamiento sexual con el fin de garantizar la integridad física y psicológica de sus colaboradores, y cualquier persona que visite o deba permanecer en las instalaciones de la Compañía y cualquier otro centro de trabajo de la Compañía.

Por lo tanto, la Compañía asume la obligación a dar a conocer las presentes disposiciones a sus colaboradores, proveedores, contratistas y visitantes de la Compañía, quienes deberán ser informados respecto a la protección que la Compañía brinda a sus colaboradores como parte de su filosofía empresarial.

Asimismo, la Compañía deberá mantener al alcance de los colaboradores y cualquier tercero que tenga implicaciones en la aplicación de la presente política, a personal debidamente capacitado y con experiencia en materia de prevención del hostigamiento sexual. Para estos efectos, la Compañía podrá suscribir convenios con organizaciones que provean conocimientos y orientación sobre los alcances de las disposiciones legales e internas sobre la materia, asegurando la confidencialidad que merecen este tipo de procesos.

La Compañía, mantendrá un registro actualizado de las sanciones en firme, impuestas en el centro de trabajo por conductas de hostigamiento sexual. Este registro podrá ser consultado por cualquier persona interesada, resguardando la identidad, los datos personales y cualquier otra información sensible de las víctimas. La información se mantendrá en el registro por un plazo de diez años, a partir de la firmeza de la respectiva sanción.

Sección II

De la protección a la víctima de acoso sexual

Artículo 5: Ninguna persona que haya denunciado ser víctima de hostigamiento sexual

Article 4. Obligations of the Company and means of prevention.

The Company recognizes the importance of implementing effective processes for the prevention and punishment of sexual harassment to guarantee the physical and mental integrity of its employees, and any person who visits or must remain in the Company's facilities and any other workplace of the Company.

Therefore, the Company assumes the obligation to make these provisions known to its employees, suppliers, contractors, and visitors of the Company, who must be informed regarding the protection that the Company provides to its employees as part of its business philosophy.

Likewise, the Company must keep at the disposal of employees and any third party that has implications in the application of this policy, duly trained personnel with experience in the prevention of sexual harassment. To this end, the Company may enter into agreements with organizations that provide knowledge and guidance on the scope of the legal and internal provisions on the matter, ensuring the confidentiality that this type of process deserves. The Company will keep an up-to-date record of the firm sanctions imposed in the workplace for sexual harassment conduct. This register may be consulted by any interested person, safeguarding the identity, personal data, and any other sensitive information of the victims. The information will be kept in the registry for a period of ten years, from the date on which the respective sanction becomes final.

Section II

Protection of the victim of sexual harassment

Article 5: No person who has reported being a victim of sexual harassment or who has appeared

o haya comparecido como testigo de las partes, podrá sufrir por ello perjuicio personal alguno en su empleo. Asimismo, quien haya denunciado hostigamiento sexual falso podrá incurrir, cuando así se tipifique, en cualquiera de las conductas propias de la difamación, la injuria o la calumnia, según el Código Penal. Sin embargo, el abuso en los procedimientos descritos en la presente política laboral podrá dar lugar a la aplicación de las sanciones disciplinarias correspondientes. Artículo 6: Quien formule una denuncia por hostigamiento sexual, sólo podrá ser despedido por causa justificada originada en falta grave a los deberes derivados de la relación laboral, según lo establecido en el artículo 81 y 369 del Código de Trabajo. De presentarse una de estas causales, la Compañía tramitará el despido ante la Dirección Nacional e Inspección General de Trabajo, del Ministerio de Trabajo, donde deberá demostrar la existencia de la falta. Sección III De los encargados para conocer e investigar una denuncia por hostigamiento sexual Artículo 7. De la Comisión Investigadora. Las denuncias se recibirán a través del portal posh@mphasis.com o por llamada al +91 9538188838, si las denuncias de acoso sexual son recibidas por colegas, líderes, gerentes o los HRBP correspondientes; dichas denuncias se remitirán inmediatamente a posh@mphasis.com o por llamada al +91 9538188838. Una vez presentada la denuncia será atendida y tramitada por una Comisión Investigadora, que estará integrada por tres miembros en el que estén representados ambos sexos, con amplios conocimientos de la materia de hostigamiento sexual y aplicación del régimen disciplinario, quienes deberán ser advertidos por escrito del deber de confidencialidad que deberá mantener durante la totalidad de las etapas del procedimiento. Artículo 8. De la conformación de la Comisión Investigadora. En principio, la Comisión	as a witness for the parties may suffer any personal injury in his or her employment. Likewise, anyone who has reported false sexual harassment may incur, when so typified, in any of the conduct typical of defamation, libel or slander, according to the Criminal Code. However, abuse of the procedures described in this labor policy may result in the application of the corresponding disciplinary sanctions. Article 6: Anyone who files a complaint of sexual harassment may only be dismissed for justified cause arising from a serious breach of the job duties related to the employment relationship, as established in articles 81 and 369 of the Labor Code. If one of these grounds arises, the Company will process the dismissal before the National Directorate and General Labor Inspectorate, from the Ministry of Labor, where it must prove the existence of the fault. Section III From those in charge of knowing and investigating a complaint of sexual harassment Article 7. From the Investigative Committee. Complaints will be received through the portal posh@mphasis.com, or by call on +91 9538188838, if complaints of sexual harassment are received by colleagues, leaders, managers or the concerned HRBPs; those complaints shall be forwarded immediately to posh@mphasis.com or by call on +91 9538188838. Once filed the complaint will be heard and processed by an Investigative Committee, which will be constituted by three members in which both sexes are represented, with extensive knowledge of the subject of sexual harassment and application of the disciplinary regime, who must be warned in writing of the duty of confidentiality that must be maintained during all stages of the procedure.
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Investigadora será conformada por personal de la Compañía y será presidida por el encargado de Recursos Humanos, quien cuenta con 5 días hábiles a partir de la recepción de la denuncia por parte de la presunta víctima para formular ante la Gerencia General una propuesta de los dos integrantes restantes. La propuesta antes descrita deberá incluir a un supervisor o representante patronal del área al que pertenezcan las partes o en su defecto, el denunciado; y otro representante patronal totalmente ajeno a la situación, quienes no deberán estar relacionados a la situación que motiva la denuncia. La aprobación de la conformación final de la Comisión Investigadora corresponderá a la Gerencia General de la Compañía, quien cuenta con un plazo de 3 días hábiles para remitir el comunicado de confirmación a quien preside la Comisión, en caso de ser aceptada la propuesta, o bien proceder a los nombramientos correspondientes ante un rechazo fundamentado de la misma. Quien preside la Comisión cuenta con 2 días hábiles para comunicar a los demás miembros su incorporación a tal órgano, que será de carácter obligatorio salvo que comuniquen una causa justificada a criterio de la Gerencia General, quien, ante la negativa del colaborador a participar como miembro de la Comisión Investigadora, contará con el plazo de dos días hábiles adicionales para ordenar su reemplazo. Artículo 9. En caso de que el denunciado sea el encargado de Recursos Humanos de la Compañía, la víctima podrá presentar la denuncia a través de posh@mphasis.com o por llamada al +91 9538188838, directamente a la Gerencia General de la compañía, que contará con un plazo de 5 días hábiles para conformar la Comisión Investigadora y comunicar el nombramiento a sus miembros tomando en cuenta los parámetros descritos en el presente apartado. Luego de esta comunicación, el encargado de RH tendrá 2 días hábiles para trasladar a la Comisión la denuncia	Article 8. On the conformation of the Investigative Committee. In principle, the Investigative Committee will be made up of Company personnel and will be presided by the person in charge of Human Resources, who has 5 working days from the receipt of the complaint by the alleged victim to formulate a proposal to the General Management of the remaining two members. The proposal described above must include a supervisor or employer representative of the area to which the parties belong or, failing that, the respondent, and another employer representative totally unrelated to the situation. The approval of the final composition of the Investigative Committee will correspond to the General Management of the Company, who has a period of 3 working days to send the confirmation communication to the chairman of the Committee, if the proposal is accepted, or to proceed with the corresponding appointments in the event of a well-founded rejection of the same. The President of the Committee has 2 working days to notify the other members of the Committee of their incorporation, which will be mandatory unless they communicate a justified cause to reject the request to the General Management, who, in the event of the collaborator's refusal to participate as a member of the Investigative Committee, will have a period of two additional working days to order their replacement. Article 9. If the accused is in charge of Human Resources of the Company, the victim may submit the complaint directly through posh@mphasis.com or by call on +91 9538188838 to the General Management of the company, which will have a period of 5 working days to form the Investigative Committee and communicate the appointment to its members, taking into account the parameters described in this section. After this communication, the person in charge of HR will have 2 working days
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presentada por la persona afectada a fin de continuar con su tramitación. Artículo 10. No obstante lo anterior, tomando en cuenta los mismos plazos anteriormente indicados, la Compañía se reserva la posibilidad de suscribir un acuerdo con una organización pública o privada externa especializada para el conocimiento y la tramitación de la denuncia en calidad de Comisión Investigadora, a solicitud del encargado de recursos humanos con el aval de la Gerencia General, o por decisión unilateral de este último. Artículo 11. La Comisión Investigadora será conformada para cada proceso individual; sin embargo, en caso de que no perjudique los intereses de las partes involucradas, los nombramientos podrán prevalecer para todos los procedimientos de esta naturaleza, previa autorización de la Gerencia General. Del procedimiento para conocer una denuncia Por hostigamiento sexual Artículo 12: El trabajador, proveedor, contratista y visitante de la Compañía, que quiera denunciar por hostigamiento sexual a un colaborador de la Compañía cualquiera que sea su rango, deberá hacerlo por medio de posh@mphasis.com o por llamada al +91 9538188838, en el mismo acto debe ofrecer toda la prueba que considere oportuna. No obstante, lo anterior, la víctima puede informar directamente a la Dirección Nacional de Inspección del Trabajo a fin de que directamente aplique el procedimiento interno vigente, en los siguientes casos: - Cuando el denunciado corresponde a la máxima autoridad o superior jerárquico dentro de la Compañía. - En los casos que exista una reducida cantidad del personal. - Cuando no existan condiciones en la Compañía para realizar la investigación de forma efectiva.	to transmit the complaint submitted to the Committee to continue with its processing. Article 10. Notwithstanding the foregoing, taking into account the same deadlines indicated above, the Company reserves the right to enter into an agreement with an external public or private organization specialized in the knowledge and processing of the complaint as an Investigative Committee, at the request of the person in charge of human resources with the endorsement of the General Management, or by unilateral decision of the latter. Article 11. The Investigative Committee will be formed for each individual process; however, if it does not harm the interests of the parties involved, the appointments may prevail for all procedures of this nature, with prior authorization from the General Management. The procedure for hearing a complaint for sexual harassment. Article 12: The worker, supplier, contractor and visitor of the Company, who wishes to report sexual harassment to an employee of the Company, regardless of the rank, must do so through posh@mphasis.com or by call on +91 9538188838, in the same act must offer all the evidence he/ she considers appropriate. Notwithstanding the foregoing, the victim may inform the National Directorate of Labor Inspection directly to apply the internal procedure, in the following cases: - When the accused corresponds to the highest authority or hierarchical superior within the Company. - In cases where there is a small number of staff. - When there are no conditions in the Company to carry out the investigation effectively.
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Artículo 13: Una vez conformada la Comisión Investigadora o el órgano competente para la tramitación de la denuncia, dentro de un plazo máximo de 5 días hábiles siguientes a esta conformación, se tomará la declaración tanto del denunciante como de la (s) persona (s) denunciada (s). Dentro de este mismo plazo la Comisión Investigadora deberá informar a la Dirección Nacional de Inspección del Trabajo sobre la recepción de la denuncia, en el cual debe consignarse únicamente el número de cédula de identidad (u otra identificación personal) de las partes, omitiendo el nombre de las mismas, salvo orden expresa de esta entidad. Artículo 14: Tomada la declaración de las partes el órgano a cargo del procedimiento procederá a la recepción de la prueba testimonial ofrecida, de la cual quedará acta escrita, debidamente firmada por el testigo. Esta audiencia tendrá una duración máxima de 8 días. Durante todo este proceso, las partes podrán hacerse representar por patrocinio letrado y de apoyo emocional y/o psicológico de su confianza, pero en este último caso si el apoyo lo constituye un colaborador de la Compañía, este último deberá suscribir un convenio de confidencialidad sobre los hechos que conozca a partir de esta intervención, que debe ser totalmente voluntaria previa solicitud expresa de la presunta víctima. Artículo 15. Durante todo este proceso, las partes podrán hacerse representar por patrocinio letrado y de apoyo emocional y/o psicológico de su confianza, pero en este último caso el apoyo lo constituye un colaborador de la Compañía, este último deberá suscribir un convenio de confidencialidad sobre los hechos que conozca a partir de esta intervención, que debe ser totalmente voluntaria previa solicitud expresa de la presunta víctima. Los costos de estos patrocinios ante dichos, o de la persona que brinde apoyo emocional a las partes, deberán ser asumidos por éstas.	Article 13: Once the Investigative Committee or the competent body for the processing of the complaint has been formed, within a maximum period of 5 working days following this formation, the statement of both the complainant and the person(s) denounced shall be taken. Within the same period, the Investigative Committee must inform the National Directorate of Labor Inspection of the receipt of the complaint, which must include only the identity card number (or other personal identification) of the parties, omitting their names, unless expressly ordered by this entity. Article 14: Once the statements of the parties have been taken, the body in charge of the proceedings shall proceed to receive the testimonial evidence offered, of which there shall be a written record, duly signed by the witness. This hearing will last a maximum of 8 days. Throughout this process, the parties may be represented by legal counselor and have emotional and/or psychological support of their trust, but in the latter case the support is provided by a collaborator of the Company, the latter must sign a confidentiality agreement on the facts that he or she learns from this intervention, which must be totally voluntary upon the express request of the alleged victim. Article 15. Throughout this process, the parties may be represented by legal representation and emotional and/or psychological support of their trust, but in the latter case if the support is provided by a collaborator of the Company, he/she must sign a confidentiality agreement on the facts that learned from this intervention, which must be totally voluntary upon the express request of the alleged victim. The costs of these sponsorships before the parties, or of the person who provides emotional support to the parties, must be borne by them.
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Artículo 16. Durante la investigación, la Compañía podrá tomar las medidas pertinentes, con la finalidad de que dicha investigación no se vea obstaculizada o afectada de ninguna forma. Por lo tanto, la Comisión Investigadora, previa solicitud de alguna de las partes y mediante resolución fundada podrá solicitar al representante patronal ordenar cautelarmente: • Que el presunto hostigador, se abstenga de perturbar al denunciante. • Que el presunto hostigador se abstenga de interferir en el uso y disfrute de los instrumentos de trabajo de la persona hostigada. • La reubicación laboral. • La permuta del cargo. • Excepcionalmente la separación temporal del cargo con goce de salario. Las medidas cautelares deberán resolverse de manera prevalente y con carácter de urgencia. Su vigencia será determinada por su instrumentalidad para el proceso a fin de garantizar su efectividad y la protección de la presunta víctima. Artículo 17. Las pruebas serán valoradas de conformidad con las reglas de la sana crítica, la lógica y la experiencia. En caso de duda se estará a lo que más beneficie a la persona hostigada, considerando la prohibición expresa de considerar los antecedentes de la persona denunciante, su vínculo con el denunciado y lo relativo al ejercicio de su sexualidad. Artículo 18: Concluida la audiencia de recepción de la prueba testimonial, quien preside la Comisión Investigadora o el representante del Ministerio de Trabajo y Seguridad Social, según sea el caso, resolverá en un plazo máximo de ocho días hábiles la existencia o no de la falta denunciada. En caso de comprobarse ésta, rendirá un informe a la Compañía recomendando que la falta sea sancionada de la siguiente forma: • Si se trata de un colaborador, se le sancionará con amonestación, suspensión	Article 16. During the investigation, the Company may take appropriate measures to ensure that the investigation is not hindered or affected in any way. Therefore, the Investigative Committee, at the request of one of the parties and by means of a reasoned resolution, may request the employers' representative to order as a precautionary measure: • That the alleged harasser refrain from disturbing the complainant. • That the alleged harasser refrains from interfering with the use and enjoyment of the harassed person's work tools. • Job relocation. • The exchange of the position. • Exceptionally, temporary separation from the position with pay. Precautionary measures should be resolved in a prevalent manner and as a matter of urgency. Its validity will be determined by its instrumentality to the process to guarantee its effectiveness and the protection of the alleged victim. Article 17. The evidence will be evaluated in accordance with the rules critical, logic and experience related thinking. In case of doubt, the rule will be applied in the best interest of the victim, considering the express prohibition of considering the background of the complainant, his or her relationship with the accused and what is related to the exercise of his or her sexuality. Article 18: At the conclusion of the hearing for the receipt of testimonial evidence, the chairman of the Investigative Committee or the representative of the Ministry of Labor and Social Security, as the case may be, shall decide within a maximum period of eight working days whether or not the alleged offence exists. If this is proven, it will submit a report to the Company recommending that the offense be sanctioned as follows:
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del trabajo sin goce de salario o despido sin responsabilidad patronal, según la gravedad de la falta. • Si se trata del patrono o alguno de sus representantes, éstos serán responsables personalmente por sus actuaciones, respecto de las cuales deberán responder en la vía judicial. De no probarse la falta, se ordenará el archivo del expediente. Artículo 19: La Comisión Investigadora tiene la obligación de comunicar el resultado del procedimiento a la Dirección Nacional de Inspección del Trabajo. Artículo 20: Los plazos señalados para tramitar y resolver las denuncias que se presenten podrán ser ampliados, siempre y cuando exista justa causa para ello y con esto no supere el término de tres meses, contados desde el momento de interposición de la denuncia, según lo dispuesto por el inciso 2º del artículo 5 de la Ley No. 7476, contra el Hostigamiento Sexual en el Empleo y la Docencia y sus reformas. Artículo 21: Una vez que se haya cerrado la investigación en la Compañía, quien no esté satisfecho con el resultado al que se llegue, puede presentar la denuncia correspondiente ante los Tribunales de Trabajo. Sección V Disposiciones finales Artículo 22. El plazo para interponer la denuncia por parte de la presunta víctima es de 2 años y se computará a partir del último hecho consecuencia del hostigamiento sexual o a partir de que cesó la causa justificada que le impidió denunciar. Artículo 23. La Compañía adoptará medidas expresas en los contratos de naturaleza no laboral a fin de asegurar la prevención y sanción de conductas de hostigamiento sexual en la	• In the case of an employee, he/she will be punished with a reprimand, suspension from work without pay or dismissal with good cause, depending on the seriousness of the offense. • In the case of the employer or any of its representatives, they will be personally responsible for their actions, for which they will have to answer in court. If the fault is not proved, the file will be archived. Article 19: The Committee of Inquiry is obliged to communicate the outcome of the proceedings to the National Directorate of Labor Inspection. Article 20: The deadlines for processing and resolving the complaints that are filed may be extended, provided that there is just cause for doing so and that this does not exceed a period of three months, counted from the time the complaint is filed, as provided for in paragraph 2 of article 5 of Law No. 7476. against Sexual Harassment in Employment and Teaching and its reforms. Article 21: Once the investigation in the Company has been closed, anyone who is not satisfied with the result may file the corresponding complaint with the Labor Courts. Section V Final Provisions Article 22. The time limit for filing a complaint by the alleged victim is 2 years and will be computed from the last event resulting from the sexual harassment or from the cessation of the justified cause that prevented her/him from filing the complaint. Article 23. The Company will adopt express measures in contracts of a non-employment
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Compañía y exigir la responsabilidad de quien se compruebe ha incurrido en actos de esta naturaleza. Para estos efectos, cuando corresponda se informará al Colegio Profesional respectivo a fin de que los mismos apliquen los procedimientos internos de investigación y sanción de sus agremiados. Artículo 24: Para todo lo que no se regule en la presente política, se aplicará lo dispuesto en la Ley No. 7476 supra citada el Código de Trabajo y las leyes laborales conexas, así como el Código Civil cuando no existan normas relativas a la prevención y sanción del hostigamiento sexual en la compañía.	nature to ensure the prevention and punishment of sexual harassment conduct in the Company and to demand the responsibility of anyone who is found to have committed acts of this nature. To this end, when appropriate, the respective Professional Association will be informed so that they can apply the internal procedures for the investigation and sanction of their members. Article 24: For everything that is not regulated in this policy, the provisions of Law No. 7476 cited above, the Labor Code and related labor laws, as well as the Civil Code, shall apply when there are no regulations relating to the prevention and punishment of sexual harassment in the company.
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Policy Revision History:

Serial No.	Version No.	Date of Change	Approver	Sections Affected	Changes in Brief
1	1.0	01-Aug-19	Eric Winston	Initial Draft	
2	1.1	17-Feb-20	Eric Winston	Policy revision	Harassment basis 'sexuality' included in the definition of sexual harassment
3	1.2	01-Jul-20	Eric Winston	Policy revision	Inclusion of the definition of Workplace and Extended Workplace
4	1.3	15-May-22	Sethu S Raman	Policy revision	Applicability to all, other than women employees in India, Removal of Core Committee, and process revision
5	1.4	18-Jul-22	Dnyan S	Objective	Added EVP convention to align policy objective in line with the Mphasis value proposition
6	1.5	31-Jul-23	Vinod Kumar	Policy Review	Reviewed the policy and no changes required
7	1.6	19-Mar-24	Eric Winston	-Policy Header -Scope Applicability -Addendum	-Nomenclature changed from POSH Policy to "Global POSH Policy". & -Updated Scope & Applicability to include Apprentices in the policy. -Added the POSH Addendum for Costa Rica region

8	1.7	30-Sep-24		Objective	Replaced the term “Unified Access” with “MphasisHub”
9	1.8	16-Mar-26	Vinod Kumar	Process/procedure in case of a case of Sexual Harassment	Included the disciplinary actions