



# Valtech India Anti-Discrimination & Harassment Policy

Valtech India Systems Private Limited

Valtech Confidential

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Revision History

Revision #	Date	Comment
V1.0	25 <sup>th</sup> Nov, 2024	First baselined version of policy document

# Purpose & Scope

*As stated in the Valtech Code of Ethics, “The company will not tolerate any discriminatory behavior towards employees or applicants in grounds of ethnic origin, nationality, gender, pregnancy or parenthood, marital status, age, disability, religion or belief, sexual identity or any other grounds covered by the prohibition of discrimination. Harassment, bullying, and sexual harassment are also prohibited.*

*Employees may not suffer any disadvantages as a result.”*

This Policy is an extension of the Code of Ethics.

Disagreement on work performance or other work-related issues is normally not considered prohibited conduct and is not dealt with under the provisions of this policy but is dealt with in the context of performance management.

## Purpose

The Valtech Anti-Harassment & Discrimination Policy (hereafter the “Policy”) aims at detailing Valtech’s commitment to ensure a workplace free of harassment, discrimination and violent behaviors, and that strives for inclusive diversity.

This Policy is a key part of Valtech’s diversity and inclusion strategy, which focuses on fair and equal treatment for all Valtech employees. This Policy shall increase the awareness and understanding of all employees of workplace harassment, violence and discrimination and provide them with a framework to identify, prevent, report and manage allegations of harassment, violence and discrimination at work.

## Principles

Valtech counts on the willingness and judgment of each employee at Valtech to ensure together the safety and protection of all. It is everyone’s duty/responsibility:

- To foster a work environment without harassment or any type of discrimination (section 2); and
- to speak up when witnessing any unacceptable behavior, without fear of retaliation (section 3).

Valtech wants everyone to be treated with openness, respect and dignity and condemns illegal harassment/discrimination, whatever the form and whoever the person involved.

# 1.2 Scope

## 1.2.1 People

This Policy covers behavior in the Workplace of Valtech employees as defined by national law and practice, as well as persons working for Valtech irrespective of their contractual status, including but not limited to, Valtech employees on short-term or long-term leave, trainees (including interns and apprentices), workers whose employment has been terminated, volunteers, and other third parties whom Valtech employees, contractors, trainees or others who come into contact with at work, e.g. business partners and customers. Hereby, we will refer to all those covered by this Policy as “Associates”.

## 1.2.2 Workplace

Workplace must be defined with a broad interpretation to encompass anti-discrimination and harassment goals.

Workplace is defined as any location, whether physical or electronic, in the course of, related to or arising out of work, including but not limited to:

- a) office spaces, public and private spaces used as a place of work, including but not limited to sanitary, washing and changing facilities.
- b) at home when the employee works remotely.
- c) during work-related assignments, trips, travel, meals, training, events or social activities.
- d) through work-related communications, including those enabled by information and communication technologies such as Teams or phone calls.
- e) in employer-provided accommodation; and
- f) in social media when used in relation to or for referring to work-related matters.

Other Valtech Policies, such as the IT Code of Conduct, may supplement this Policy and add requirements related to behavior using Valtech’s information technologies.

## 1.2.3 Behaviors

This Policy covers 2 types of unacceptable behaviors at work:

- a) all types and forms of harassment; and
- b) all types and forms of discrimination.

## 2. What is harassment?

“Harassment” under this Policy refers to a vexatious (abusive, humiliating, hurtful) conduct in the form of comments, gestures or behaviour that:

- are repeated;
- are hostile (aggressive, threatening) or unwelcome;
- adversely affect a Associate or a group of Associate’s dignity (that is, self-respect, self-esteem) or integrity (physical, psychological or emotional balance);
- make the workplace harmful to the person or group.

A single serious incident of such behaviour could also be considered harassment if it has a lasting negative impact on the Associate or group.

The harassers’ intent (whether they meant it or not) does not matter. The harassment just needs to be unwanted and/or objectionable or offensive to the recipient or witness to the conduct.

Harassment under this Policy may be divided into psychological or sexual harassment. Harassment may also be linked to discrimination.

Discriminatory harassment is also considered psychological or sexual harassment if it is based on identifiable grounds, such as:

- race, colour, ethnic or national origin;
- age, language, sex, pregnancy, civil status;
- gender identity or expression, sexual orientation;
- religion, social condition, political convictions; or
- a handicap or the use of any means to palliate a handicap.

Harassment may be carried out through different mediums, including but not limited to physical acts or violence, verbal interactions and cyberbullying.

The term used to refer to harassment and the definition of harassment may vary from one jurisdiction to another depending on local laws and local culture.

*This Policy does not in any way limit any right or obligation of Valtech and the people covered under this Policy. Local laws and local policies shall pre-empt this Policy to the extent of a conflict.*

## 2.1 Sexual Harassment

Please refer to our Prevention of Sexual harassment (POSH) Policy for specific details of policy according to local laws.

Valtech prohibits any kind of sexual harassment towards any of its Associates or from a Associate in relation to their work at or with Valtech.

Subject to local laws, sexual harassment in the workplace can be described as:

- 2.1.1 engaging in vexatious comments or conducts against a Associate in a workplace because of sex, sexual orientation, self-identified or perceived sex, gender identity or gender expression, the status of being transgender, where the comment or conduct is known or ought reasonably to be known to be unwelcome and results in unreasonably interfering with a Associate's work performance or creating an intimidating, hostile or offensive work environment or in violating a Associate's dignity; or
- 2.1.2 making a sexual solicitation or advance where the Associate making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the Associate and the Associate knows or ought reasonably to know that the solicitation or advance is unwelcome (so-called "quid-pro-quo sexual harassment" i.e. "this for that"). Quid pro quo sexual harassment can be either explicit or implicit. For example, the harasser may outright ask for the exchange or may hint at it ("Don't you want this job?").

Please note, these are 2 examples. This list is not exhaustive as examples of sexual harassment in the workplace.

### Examples:

Sexual harassment may include, without limitation, among other things:

- words, signs, jokes, pranks, intimidation or physical violence which are of a sexual nature, or which are directed at an Associate because of that Associate's sex,
- Sharing sexual photos (pornography),
- Posting sexual posters,
- Sexual comments, jokes, questions, or innuendo,
- Inappropriate touching/Inappropriate sexual gesture,
- Invading personal space in an unwanted way.

In Quid pro quo Sexual harassment in exchange for romantic or sexual services, the harasser may:

- Offer a job/a promotion/a raise/opportunity,
- Create different working conditions and/or better work locations,
- Threaten a demotion/a termination if advances are denied,
- Making or threatening reprisals after a negative response to sexual advances.

## 2.2 Psychological Harassment

Psychological harassment has a negative impact on a Associate's psychological well-being. The Associate usually feels put down and belittled on a personal level, a professional level or both.

The conduct is offensive enough that there is often a risk that this psychological damage ends up impacting a Associate's physical health, mental health, social life and work life. However, this does not mean that the managers and team leaders cannot have difficult discussions about discipline, behaviors, etc, as long as these conversations are taking place based on well-reasoned assessments that are in alignment with Valtech values.

It is important to distinguish between personal attacks on a Associate's identity versus constructive and objective

feedback around performance.

**Examples:**

Psychological harassment may consist in:

- Isolating or denying the Associate's presence.
- Belittling or trivializing the Associate's thoughts.
- Discrediting or spreading rumors about the Associate.
- Comparing/undermining one Associate as compared to a top performer.
- Repeated verbal abuse.
- Verbal or physical conduct that is threatening or humiliating.
- The sabotage of an Associate's work performance.

## 2.3 Physical Acts

Physical violence (also called physical harassment) are unacceptable behavior(s) by one or more Associates.

This behavior can take many different forms, some of which may be more easily identified than others. This occurs when one or more Associate(s) feel(s) physically attacked or threatened or, in extreme circumstances, assaulted in the workplace.

**Examples:**

Violent behaviors may include, among other things:

- Direct threats of intent to inflict harm.
- Physical attacks (hitting, throwing objects at a person, shoving, kicking...).
- Threatening behavior (shaking fists angrily).
- Destroying property to intimidate.

## 2.4 Verbal Interactions

Verbal harassment or more generally inappropriate verbal behaviors is not always considered to be illegal. However, Valtech does not tolerate any verbal harassment, no matter the medium or frequency.

**Examples:**

The most common types of verbal harassment are: threatening, yelling, insulting or cursing at a victim in public or in private.

## 2.5 Cyberbullying

Cyberbullying is harassment that takes place over digital devices like mobile phones, computers, and tablets.

Cyberbullying can occur through SMS, emails, Instant Messaging, and apps, or online in social media, forums, or gaming where people can view, participate in, or share content.

Cyberbullying includes sending, posting, or sharing negative, harmful, false, or mean content about someone else. It can include sharing personal or private information about someone else causing embarrassment or humiliation.

**Examples:**



An on-line harasser can, for example:

- share humiliating things about the victim by mass email or mass chat.
- spread lies or rumors about the victim on social media or with the victim's employer.
- send harassing instant messages or text messages directly to the victim.

*Please note, these lists are not exhaustive and there may be additional conducts which qualify as harassment under local law*

## 3. What is discrimination?

At Valtech, we are opposed to all forms of unfair and unlawful discrimination. In direct application of our Code of Ethics, our commitment is:

- to provide equality to all our employees, contractors and business partners whom we interact with every day; and
- that all decisions regarding employment practices: recruitment, hiring, promotion, compensation, employee development decisions such as training, and all other terms and conditions of employment, including discipline, will be made without regard to age, race/ethnicity, color, gender, national origin, religion, disability, sexual orientation, gender identity or expression and veteran status or any other prohibited grounds of discrimination under local laws.

Our process is to select the most qualified individual for each position in the organization, whether that is a new hire, a transfer to another position, or a promotion.

### Examples:

Of gender-based discrimination:

- A woman with 2 small children was told not to apply to a job with bigger responsibility because she will not have the time and capacity to do it.
- A man was told not to apply because it is a woman's job or vice versa a woman employee was told not to apply to certain jobs because it is a 'man' job.

Of racial discrimination:

- A candidate was not granted a job because s/he is of a certain race/ethnicity.
- Assigning employees of a certain race/ethnicity different job duties.
- Failure to hire employees of a certain race/ethnicity to maintain a "certain look" in a workplace.
- Unfairly disciplining certain employees on the basis of race/ethnicity.

Of religious discrimination or intolerance:

- Dismissing an employee because of his/her religion.
- Deciding not to hire an applicant because of his/her religion.
- Refusing to develop or promote an employee because of their religion.
- Workplace or job segregation based on religion, such as assigning an employee to a non-customer contact position because of actual or feared customer preference.

Of Age discrimination:

- A candidate is not granted a job because they are considered as too old or too young despite having appropriate and required experience.
- An employee is targeted in a restructuring (dismissal for economic reasons) because of their age.
- Treating a person differently or less favorably from younger employees.
- Treating a person differently or less favorably from older employees.

*Please note, these lists are not exhaustive and there may be additional conducts which qualify as harassment under local law.*

## 4. Reporting, investigating and dealing with unacceptable behaviors

At Valtech, Associates are required to immediately report potential unacceptable behavior(s), or any conduct under this Policy which may pose a real or potential threat to anyone working in Valtech.

Any Associate who feels harassed and/or discriminated against or any Associate who is made aware of a harassment and/or discrimination allegation must report it, so that any potential violation of this Policy can be investigated, and when applicable, corrected promptly. Harassment and discrimination may also be regulated by local legislations, policies or legal procedures, which shall supersede this Policy to the extent of the conflict. This Policy does not prejudice these procedures nor the mandatory legislation that may apply.

Whilst the Group strongly encourages its Associates to share any concerns they may have, doing so is entirely voluntary. Without prejudice to the procedures provided for in local rules and regulations, this section explains how to report a concern, how the concern is investigated and the protection against any kind of retaliation.

### 4.1 How to raise a concern?

It should be considered as everyone's responsibility to immediately raise a concern in compliance with this Policy as soon as they are aware of an unacceptable behavior, save for situation where a local reporting procedure applies.

There are several ways for a Associate faced with or witnessing any (even potential) unacceptable behavior to raise a concern:

- 4.1.1. speak with their manager or to their People & Culture BP. Once informed, Managers/Supervisors are required to promptly (ideally, within 24 hours) report any violation or suspected violation of this Policy to the People & Culture BP;
- 4.1.2. If this option seems difficult or inappropriate given the sensitivity of the situation, the Associate should contact the People & Culture directly, the Group Vice-President of Diversity & Inclusion and the Group General Counsel ([ethics@valtech.com](mailto:ethics@valtech.com)) for investigating harassment or discrimination claims (if any);
- 4.1.3. If any of the two above options does not appear appropriate to the discloser, report the complaint via the Whistleblower Policy. Valtech's whistleblower hotline provide a secured, anonymous way to report an alert. It can also provide a confidential way to interact with the Legal team for follow up questions on the complaint via a secured independent mailbox. The person raising the concern may, at its option, remain anonymous. However, Associates making use of the whistleblowing system are encouraged to identify themselves to allow for a more thorough investigation.

Whenever possible, a complaint should include details of the incident or incidents as well as names of Associates involved, dates, and names of any witnesses.

Valtech encourages all Associates, officers and directors to report any suspected violations promptly and intends to thoroughly investigate any good faith reports of violations. The Group will not tolerate any kind of retaliation for reports or complaints regarding misconduct that were made in good faith. Open communication of issues and concerns by all Associates, officers and directors without fear of retribution or retaliation is vital to the successful implementation of this Policy.

## 4.2 Corrective Measures and Disciplinary actions

All concerns will be impartially and objectively examined. Internal investigations will be conducted as necessary. Details on internal investigations are provided in the [Code of Ethics](#). As a reminder, all Associates to whom a complaint is made or who learn of a complaint as part of a company investigation must do everything reasonably possible, in accordance with applicable law, to keep the complaint confidential, to preserve the integrity of the investigation while it is ongoing, ensuring fairness to all involved, and to protect the privacy of Associates who have raised concerns or are accused of misconduct. The investigation team consists of persons within the People & Culture, Legal, and Compliance teams with potential help from external investigators (the “**Investigation Team**”). The investigators are appointed to ensure that the investigation is done in an independent and objective manner. Further to the investigation, if a Policy violation has occurred, appropriate measures will be taken in relation to the wrongdoing. This may include corrective measures and/or disciplinary actions up to and including dismissal of the wrongdoer, in the conditions described in the Valtech Code of Ethics or as permitted under local law in India.

## 4.3 No Retaliation

Retaliation occurs when any adverse action is taken against an Associate as a result of having raised a concern about a misconduct. The adverse action is taken to punish the Associate for raising a concern or to discourage future attempts to raise concerns.

Adverse actions can include termination, demotion, the withholding of a promotion or other financial incentives. Retaliation may also be less obvious such as a failure to invite a Associate to a meeting or refusal to authorize a training or travel.

Valtech protects the rights of, and prohibits retaliation against, those who volunteer information or cooperate proactively with an investigation. But for this protection to apply, the person must be acting in good faith.

### Example:

- Associate raised a concern against his manager Associate B,
- B hears about the concern raised and B finds out that it was A who launched the alert,
- B starts making A's life miserable excluding A from meetings, taking away valuable work assignments, and referring to A as a troublemaker to make A regret that A raised this alert and to discourage A from raising further complaints.

In this example, B is retaliating against A.

## 4.4 A Healthy Workplace Environment is Everyone's Business

Discrimination or harassment can have both short-term long-term impacts on Associates, and affect Valtech's reputation and healthy working environment. It should be everyone's priority to prevent and mitigate degrading or harmful conducts in the workplace.

Each Associate is expected to:

- read the Valtech Code of Ethic
- participate in the Workplace Harassment training organized within Valtech India (in particular e-learning modules) [available here](#).

## 4.5 Questions / Concerns on this Policy?

Please reach out to [ln.DEI@valtech.com](mailto:ln.DEI@valtech.com)

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Subject to local laws, sexual harassment in the workplace can be described as:

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However, Valtech does not tolerate any verbal harassment, no matter the medium or frequency.

### **Examples:**

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- that all decisions regarding employment practices: recruitment, hiring, promotion, compensation, employee development decisions such as training, and all other terms and conditions of employment, including discipline, will be made without regard to age, race/ethnicity, color, gender, national origin, religion, disability, sexual orientation, gender identity or expression and veteran status or any other prohibited grounds of discrimination under local laws.

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Whilst Valtech strongly encourages its Associates to share any concerns they may have, doing so is entirely voluntary. Without prejudice to the procedures provided for in local rules and regulations, this section explains how to report a concern, how the concern is investigated and the protection against any kind of retaliation.

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2. If this option seems difficult or inappropriate given the sensitivity of the situation, the Associate should contact the People & Culture Lead directly, the Group Vice-President of Diversity & Inclusion and the Group General Counsel (at [ethics@valtech.com](mailto:ethics@valtech.com)) for investigating harassment or discrimination claims (if any);
3. If any of the two above options does not appear appropriate to the discloser, report the complaint via the [Whistleblower Policy](#). Valtech's [whistleblower hotline](#) provide a secured, anonymous way to report an alert. It can also provide a confidential way to interact with the Legal team for follow up questions on the complaint via a secured independent mailbox. The person raising the concern may, at its option, remain anonymous. However, Associates making use of the whistleblowing system are encouraged to identify themselves to allow for a more thorough investigation.

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### **Example:**

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## 6.4 A Healthy Workplace Environment is Everyone's Business

Discrimination or harassment can have both short-term long-term impacts on Associates, an affect Valtech's reputation and healthy working environment. It should be everyone's priority to prevent and mitigate degrading or harmful conducts in the workplace.

Each Associate is expected to:

- read the Valtech Code of Ethics



- participate in the Workplace Harassment training organized within the Group (in particular e-learning modules) [available here](#).

## 6.5 Questions / Concerns on this Policy?

Please reach out to your local DE&I lead at [In.DEI@valtech.com](mailto:In.DEI@valtech.com).

# 7. Policy Revision

Valtech may amend this Policy at any time, at its discretion, and without notice.

This Policy does not in any way limit any right or obligation of Valtech and the people covered under this Policy. Local laws and local policies shall pre-empt this Policy to the extent of a conflict.

.....End of the document.....