

Global Ethics Policy

Purpose of this Policy

The Global Ethics Policy assists in formalizing Firstsource's commitment to following high standards of ethics and integrity. Through the Global Ethics Policy, Firstsource aims to facilitate employees', agents', representatives', vendors' and business partners' ability to fulfill legal and ethical responsibilities in day-to-day business activities and dealings.

Policy coverage

All Firstsource employees, agents, representatives, vendors and business partners must become familiar and comply with Firstsource's Global Ethics Policy.

Key Principles

a. Principle 1: Behavioral Conduct

Firstsource expects employees, agents, representatives, vendors and business partners to exercise good judgment to ensure a safe and healthy working environment for fellow employees, contractors, clients and customers of Firstsource. Firstsource strictly prohibits harassment, victimization, bullying, workplace violence and misuse of company assets and information.

b. Principle 2: Business Philosophy

The organisation encourages the conduct of business in a manner that promotes fair competition and expects employees to uphold the organisational values when undertaking business transactions with clients and government authorities.

c. Principle 3: Legal & Regulatory Compliance

Firstsource expects all employees, agents, representatives, vendors and business partners to ensure legal and regulatory compliance in the activities performed on its behalf. Firstsource prohibits sharing of any material, non-public information about the organization. Firstsource prohibits its employees, agents, representatives, vendors and business partners from making any direct or indirect payment, promises or ex-gratia payment to any official in any country.

d. Principle 4: Conflict of Interest

Firstsource urges employees, agents, representatives, vendors and business partners to avoid situations involving any actual or potential conflicts of interest. Firstsource mandates that personal investments in customer, supplier or competitor organisations should not in any way or form lead to a compromise in the employees, agents, representatives, vendors and/or business partners responsibilities to Firstsource.

e. Principle 5: Relationships with Stakeholders

Firstsource mandates professionalism, honesty and integrity when communicating with stakeholders, and strictly prohibits taking unfair advantage through manipulation, concealment and abuse of privileged information, misrepresentation or any other unfair practices.

Responsibilities as a Supplier and/or Vendor

Suppliers and vendors must:

- a. Work within the ambit of law and deal fairly with Firstsource and its stakeholders, while maintaining flexibility and cost competitiveness.
- b. Raise any queries and report any violations to its Firstsource representative .
- c. Ensure that its accounts are prepared in a fair and accurate manner, in accordance with the accounting and financial reporting standards representing the generally accepted guidelines, principles, standards, laws and regulations of each country that it conducts its business in.
- d. Be transparent in all dealings with Firstsource.
- e. Maintain an environment free of harassment in the workplace.
- f. Not misuse assets and resources belonging to and/or controlled by Firstsource. Assets should be protected and employed efficiently to conduct only duly authorized business activities.
- g. Not receive or offer (directly or indirectly) remuneration, gifts or making any payments or donations or providing comparable benefits to any political party or candidate on behalf of the organisation.

Reporting Concerns

Firstsource encourages prompt reporting of any event of misconduct, crime, misdemeanor or actual/possible violation of the Global Ethics Policy or any act in contravention to the organisation's interests.

Any violation/suspected violation of the Global Ethics Policy can be addressed to ethicscompliance@firstsource.com . In cases where you observe or wish to report issues which impact the organisation at large and/or when the initial lines of communication fail, you can approach the Executive Management or the Chairman of the Board of Directors.