

Title:	AntiBullying Policy
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WORKPLACE ANTI-BULLYING & ANTI-HARASSMENT POLICY:

ALight Technology And Services Limited & ALight Technologies USA Inc (Startups) seeks to provide a safe and enjoyable work environment.

Remember free-speech and bullying are different. Free-speech and harassment are different. The Startups support and encourage free-speech. Bullying, harassment, sexual harassment are a big NO-NO! The startups support – “see something, say something, stand-up”.

Bullying has a detrimental effect on the Startups and the society. People who are bullied can become distressed, anxious, withdrawn and can lose self-esteem and self-confidence. Bullying is also in some circumstances against the law. For these reasons, bullying will not be tolerated by the Startups.

This standard aims to be respectful of individuals.

This Policy applies to behaviors that occur:

In connection with work, even if it occurs outside normal working hours; During work activities, for example, when dealing with clients;

This Policy applies to all workers including employees, contractors and volunteers.

In so far as this policy imposes any obligations on the Startups (ie those additional to those set out under legislation), those obligations are not contractual and do not give rise to any contractual rights. To the extent that this policy describes benefits and entitlements for employees (ie those additional to those set out under legislation), they are discretionary in nature and are also not intended to be contractual. The terms and conditions of employment that are intended to be contractual are set out in an employee’s written employment contract.

The Startups may unilaterally introduce, vary, remove or replace this policy at any time.

WHAT IS WORKPLACE BULLYING?

Workplace bullying occurs when an individual, or a group of individuals, repeatedly behaves unreasonably towards a worker, or a group of workers, and the behavior creates a risk to health and safety. It includes both physical and psychological abuse.

Bullying behaviors can take many different forms, from the obvious (direct) to the more subtle (indirect). The following are some examples of direct bullying:

Abusive, insulting or offensive language or comments; Violent, aggressive or intimidating conduct;

Belittling or humiliating comments; Victimization; and practical jokes or initiation.

The following are some examples of indirect bullying: Unjustified criticism or complaints;

Deliberately excluding someone from work-related activities; Withholding information that is vital for effective work performance; Setting unreasonable timelines or constantly changing deadlines;

Setting tasks that are unreasonably below or beyond a person's skill level;

Denying access to information, supervision, consultation or resources to the detriment of the worker; Spreading misinformation or malicious rumors; and

Changing work arrangements such as rosters and leave to deliberately inconvenience a particular worker or workers.

The above examples are not an exhaustive list of bullying behaviors. They are indicative of the type of behaviors that may constitute bullying and are therefore unacceptable to the Startups. If you are unsure whether behavior not provided on this list constitutes bullying you should contact your direct supervisor in the first instance.

WHAT IS NOT WORKPLACE BULLYING?

Reasonable management action taken by managers or supervisors to direct and control the way work is carried out is not considered to be workplace bullying, if the action is taken in a reasonable and lawful way.

The following are some examples of reasonable management action: Realistic and achievable performance goals, standards and deadlines; Fair and appropriate rostering and allocation of working hours; Transferring a worker to another area or role for operational reasons;

Deciding not to select a worker for a promotion where a fair and transparent process is followed; Informing a worker about unsatisfactory work performance in an honest, fair and constructive way; Informing a worker about unreasonable behavior in an objective and confidential way; Implementing organizational changes or restructuring; and

Taking disciplinary action, including suspension or terminating employment where appropriate or justified in the circumstances.

OTHER UNACCEPTABLE CONDUCT

Single incidents of unreasonable behavior (such as harassment, violence or threatening behavior) can also present a risk to health and safety and will not be tolerated.

Harassment is considered to be any form of behavior that is:

Unwanted;

Offends, humiliates or intimidates; or Creates a hostile environment.

Where such conduct occurs towards a person due to a particular characteristic of that person (such as when based on sex, sexual orientation, pregnancy, marital status, age, disability, ethnicity or race,) this may be unlawful under discrimination and equal opportunity law, even if it is limited to a single incident.

For example, sexual harassment is unlawful even where it is not repeated conduct. All workers are required to comply with the Startups Equal Opportunity and Anti-Discrimination Policy which provides further guidance in this area.

The Startups will also not tolerate any form of workplace violence. Workplace violence is considered to be any incident where a person is physically attacked or threatened in the workplace, whether this is directed to a co- worker, subcontractor, client, customer or visitor.

It includes (but is not limited to):

Any type of direct physical contact such as punching, pushing, tripping, spitting or blocking of someone's way;

Any form of unwanted physical contact.

MANAGERS' AND SUPERVISORS' ROLES

Managers and supervisors have an important role to play in terms of fostering a culture that does not tolerate or encourage harassment, bullying or workplace violence and should ensure that they do not engage in any conduct of this nature themselves.

Managers and supervisors should also ensure that workers understand this Policy and consequences of non- compliance. When managers and supervisors observe harassment, bullying or workplace violence occurring, they should take steps to prevent this conduct from continuing and warn the person or people involved of the consequences if the behavior continues (including disciplinary measures up to and including termination of employment).

Managers and supervisors must also treat all grievances raised by workers in accordance with the Startups Grievance Handling Policy.

WORKERS' ROLE

The Startups expects workers:

Not to engage in harassment, bullying or workplace violence;

Not to aid, abet or encourage others to engage in harassment, bullying or workplace violence; To behave in a responsible and professional manner;

Treat others in the workplace with courtesy and respect;

Listen and respond appropriately to the views and concerns of others; and To be fair and honest in their dealings with others.

ARE YOU EXPERIENCING BULLYING, HARASSMENT OR BEING SUBJECT TO VIOLENCE?

Complaints of bullying, harassment and workplace violence will be taken seriously and will be handled in accordance with the Startups Grievance Handling Policy.

If you make a complaint of workplace bullying, harassment or violence it will be taken seriously and will be dealt with sympathetically and in a confidential manner (except where the Startups deems it is necessary to disclose information in order to properly deal with the complaint).

You will not be victimized or treated unfairly for making a complaint.

If the claim is found to be substantiated, the Startups will act in accordance with its Disciplinary & Termination Policy.

Please note that any worker found to have fabricated a complaint may be subject to disciplinary action under the Disciplinary & Termination Policy, up to and including termination of employment.

OTHER MEASURES

The Startups also recognizes the need for open communication in the workplace. The Startups may implement what training it considers necessary in relation to behavioral standards and where appropriate will hold meetings to address standards, expectations and any issues. The frequency, dates and form of this training and meetings will be determined by management of the Startups.

MORE INFORMATION

If you need any more information about workplace bullying, harassment, or violence please see your manager.

REPORTING

- Use the internal sharepoint form, the form submissions are reviewed by Kanti Kalyan Arumilli, the founder & CEO, personally.
- Email Kanti Kalyan Arumilli, the founder & CEO at admin@alightservices.com or kantikalyan.arumilli@alightservices.com or on +44-3333-03-1284 or +44-07718-273-964 or +1-480-347-6849 or +91-789-362-6688.