

PERSISTENT'S ANTI-HUMAN TRAFFICKING POLICY

Persistent Systems Limited and its group Companies ("Persistent") are strongly committed to supporting and maintaining the highest standards of ethical conduct and respect for human rights. Our policy, practices, procedures reflect our commitment to human rights and sound employment practices. Persistent prohibits employees, subcontractors, subcontractor employees, consultants and agents from engaging in human trafficking related activities. These activities include without limitation engaging in sex trafficking, procuring commercial sex acts (even if this practice is legal in the jurisdiction where it transpires), using force, fraud, or coercion to subject a person to involuntary servitude, or obtaining labor from a person by threats of serious harm to that person or another person, among others.

Persistent prohibits employees, subcontractors, subcontractor employees, consultants and agents from engaging in practices related to trafficking in persons including without limitation:

1. Procuring commercial sex acts during the period of performance of the contract;
2. Use forced or child labor in the performance of the contract;
3. Destroying or otherwise denying access by an employee to the employee's identity or immigration documents;
4. Using misleading or fraudulent practices during the recruitment of employees or offering of employment
5. Charging employees or potential employees recruitment fees;
6. Providing or arranging housing that fails to meet the host country housing and safety standards;
7. Using recruiters that do not comply with local labor laws;
8. Failing to provide an employment contract or work document where required by law;
9. Failing to provide return transportation to certain employees who are brought to a country for the purpose of working on a US Government contract;

We flowdown the Federal Acquisition Regulation (FAR) 52.222-50 combating trafficking in persons requirements to all covered suppliers, subcontractors and agents. We also require suppliers to provide certifications of compliance with respect to their plans regarding anti-human trafficking where required by the FAR.

Persistent operating companies must cooperate fully with the US Government or other appropriate governmental authorities in audits or investigations relating to violations, if any of

this policy, legal regulations, FAR and procedures. Persistent's and its subcontractor's employees and agents should cooperate in any internal or external investigation of suspected wrongdoing under this Policy, and provide reasonable access to its facilities and staff and provide timely and complete responses to Government auditors' and investigators' requests for documents;

Persistent requires its employees, subcontractors, subcontractor employees, consultants and agents to behave in ethical manner, ensure integrity of their operations and be accountable for highest standards of behavior. Persistent shall take appropriate disciplinary actions for violations of these rules, policies, contract provisions, applicable legal requirements and/or laws, including reduction in benefits, termination of service of employees and agents hired for this purpose. Persistent also reserves the right to terminate its relationship for misconduct or to take any other appropriate action with any supplier, subcontractor, subcontractor's employee, agent under the terms of relevant contract.

Reporting Violations and/or Concerns: Persistent expects and asks its employees and any associated persons in this regard (whether any agencies or outsiders) to raise any concerns regarding any actual or potential violations of law, regulations or this policy.

They must report their concerns immediately to whistleblower@persistent.com; or

For offline complaints: Ms. Anuja Ramdasi-Head – Internal Audit- Ph. No.: (020) 6746 2094; e-mail ID: anuja_ramdasi@persistent.com.

Timeliness of reporting is critical as US Government has imposed a stringent reporting obligation when there is credible information of violations. Stakeholders should disclose information sufficient to identify the nature and extent of an offense. Failure to report actual or potential illegal behavior or actual or potential violations of this policy may subject Persistent's employees, its subcontractors or other stakeholders who are found in default to disciplinary actions, including termination of employment/ contract.

Non-Retaliation Policy: Persistent does not tolerate retaliation or threats of retaliation against any individual who raises concern under this Policy or who assists in any relevant audit or investigation. Any person who engages in retaliation or threats of retaliation will face disciplinary action which includes without limitation termination of employment/contract. It is crucial that all employees suspected of being victims of or witnesses to prohibited activities are protected, and sub-contractor, agents shall not prevent or hinder the ability of these employees from cooperating fully with Government authorities.

Review Our Efforts: Persistent periodically reviews its anti-human trafficking mitigation efforts in light of our ongoing compliance obligations to monitor effectiveness and to ensure consistency with our values. Persistent will continue to review and enhance as appropriate our efforts to prevent human trafficking and other misconduct within Persistent or by any of its other stakeholders.

Awareness Program: Persistent provides training and awareness on human trafficking and forced labor through various methods, including online training modules, ethics articles, posters at applicable work sites etc.

Last updated: 15 April 2020