



Lobbying Policy



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Introduction

Persistent Systems Limited (the 'Company' or 'Persistent') has committed to near-term and long-term company-wide emission reductions in line with the Science Based Target Initiative (SBTi). Our strategy involves initiatives to align with the goal of limiting global temperature rise to 1.5°C as per the Paris Agreement. Since 2022, Persistent supports the Ten Principles of the United Nations Global Compact (UNGC) on human rights, labor, environment and anti-corruption. We are committed to making the UNGC principles part of our company's strategy, culture and day-to-day operations.

Persistent has committed to source 100% of its energy from renewable sources in owned facilities, and we have achieved carbon neutrality one year ahead of the target year i.e. 2025. By following the guidelines mentioned in this policy, we aim to foster positive stakeholder relationships and promote practices that encourage sustainable growth and environmental stewardship. This includes engaging with non-profit organizations, trade and business associations, and industry alliances and coalitions.

Purpose

Persistent's business activities include software development, data management, and IT consulting across industries like healthcare, finance, and manufacturing, driving innovation and efficiency. The Persistent Foundation focuses on education, healthcare, and environmental sustainability, positively impacting communities. Our operations align with the Paris Agreement's objectives by enhancing energy efficiency and reducing emissions, demonstrated by our commitment to 100% renewable energy and achieving carbon neutrality.

Scope

This policy applies to all employees, executive leadership, directors, and representatives of Persistent involved in lobbying at local, national, and international levels across all jurisdictions where we have operations.

Lobbying

Lobbying refers to the act of attempting to influence the decisions of government officials and policymakers in favor of specific legislation, policies, or regulations. At Persistent Systems, our approach to lobbying is rooted in transparency, ethics, and integrity. We aim to advocate for

policies that support our commitment to sustainability, ethical business practices, and the global climate goals of the Paris Agreement. By engaging in lobbying activities related to global climate goals, we strive to create a positive impact on society and the environment, ensuring that our business growth aligns with sustainable development and environmental stewardship principles.

Guidelines for Ethical Lobbying

- **Support Paris Agreement:** Align efforts with limiting global warming.
- **Advocate for Positive Policies:** Lobby for policies that promote sustainable development, renewable energy, and greenhouse gas emission reductions.
- **Maintain Transparency:** Ensure practices are transparent, honest, and grounded in integrity.
- **Provide Accurate Information:** Share truthful and clear information based on a thorough understanding of the issue.
- **Promote Informed Decisions:** Support decision-making aligned with Persistent's sustainability/ESG goals.
- **Acknowledge Representation:** Clearly state that lobbying is conducted on behalf of Persistent.
- **Engage Stakeholders:** Collaborate with governments, NGOs, and the public to foster collective climate action.
- **Register Appropriately:** Ensure registration in mandatory and voluntary lobbyist databases as required.
- **Report and Ensure Accountability:** Regularly report climate change policy positions, activities and outcomes of trade associations and direct lobbying activities and outcomes to the Board of Directors (the 'Board') and maintain accountability through internal audits.
- **Select Third Parties Wisely:** Conduct due diligence when choosing third parties for lobbying to ensure compliance with all relevant policies.
- **Legal Compliance:** Ensure all lobbying activities comply with relevant laws and regulations in jurisdictions where Persistent operates.
- **Internal Policies:** Adhere to internal policies on anti-corruption, conflict of interest, and data protection.
- **Avoid Creating Obligations:** Refrain from activities that might create obligations for the recipient or expect immediate returns for the company or individuals.
- **Do Not Mislead:** Never provide false or misleading information.

- **Avoid Improper Influence:** Do not attempt to improperly influence decisions by encouraging stakeholders to act against their lawful duties.

Approval and Compliance

Before engaging in discussions with policymakers, it is essential to obtain Corporate Secretarial and Legal approval based on the technical inputs received from the ESG Team. All lobbying activities must comply with relevant laws and regulations in the jurisdictions where Persistent operates.

Governance Framework

The governance framework for Persistent's lobbying policy ensures that all activities align with the company's values and strategic objectives, maintaining transparency, integrity, and accountability at every level. This framework incorporates several key components designed to uphold the highest standards of ethical conduct and compliance.

Oversight and Monitoring Process

Oversight:

The Stakeholders Relationship (SRC) and ESG Committee of the Board are responsible for regularly reviewing and monitoring lobbying activities to ensure they are consistent with Persistent's values and objectives. This includes ensuring that practices are transparent, honest, and grounded in integrity.

Monitoring:

- **Identify Misalignments:** Regularly evaluate the climate change policy positions of trade associations and direct lobbying activities to identify any misalignments with Persistent's own climate position.
- **Engage in Dialogue:** Initiate constructive dialogue with trade associations to address any discrepancies. Advocate for alignment with Persistent's climate objectives and sustainability goals.
- **Escalate Concerns:** If significant misalignments persist, escalate the issue to the appropriate level of management. Decisions regarding continued membership or other actions will be made based on the impact on Persistent's values and objectives.

- **Report and Adjust:** Document and report any actions taken to address misalignments. Review the effectiveness of these actions and make adjustments as necessary to ensure ongoing alignment with Persistent's climate position.

Grievance Redressal

If any individual wishes to report any malpractice or unethical behavior related to lobbying activities, they may do so through Persistent's [whistleblower mechanism](#). This mechanism provides a confidential and secure channel for employees, contractors, vendors, service providers, trainees, interns or any other parties affiliated to Persistent Systems to raise concerns without fear of retaliation. Persistent's commitment to ethical conduct ensures that all grievances are handled with the utmost seriousness and integrity, maintaining the company's high standards of transparency and accountability.

Review

Lobbying activities and outcomes, contributions to and spending for lobbying organizations are regularly reported in our ESG report, and accountability is maintained through internal audits. The policy should be reviewed at least once in two years by the Stakeholders Relationship (SRC) and ESG Committee of the Board.

About Persistent

Persistent Systems (BSE & NSE: PERSISTENT) is a global services and solutions company delivering Digital Engineering and Enterprise Modernization to businesses across industries. With over 23,900 employees located in 19 countries, the Company is committed to innovation and client success. Persistent offers a comprehensive suite of services, including AI-enabled software engineering, product development, data and analytics, CX transformation, cloud computing, and intelligent automation. The Company is part of the MSCI India Index and is included in key indices of the National Stock Exchange of India, including the Nifty Midcap 50, Nifty IT, and Nifty MidCap Liquid 15 as well as several on the BSE such as the S&P BSE 100 and S&P BSE SENSEX Next 50. Persistent is also a constituent of the Dow Jones Sustainability World Index. The Company has achieved carbon neutrality, reinforcing its commitment to sustainability and responsible business practices. As a participant of the United Nations Global Compact, Persistent is committed to aligning strategies and operations with universal principles on human rights, labor, environment, and anti-corruption, as well as take actions that advance societal goals. With 327% growth in brand value since 2020, Persistent is the fastest-growing IT services brand in the 2024 Brand Finance India 100 Report.

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