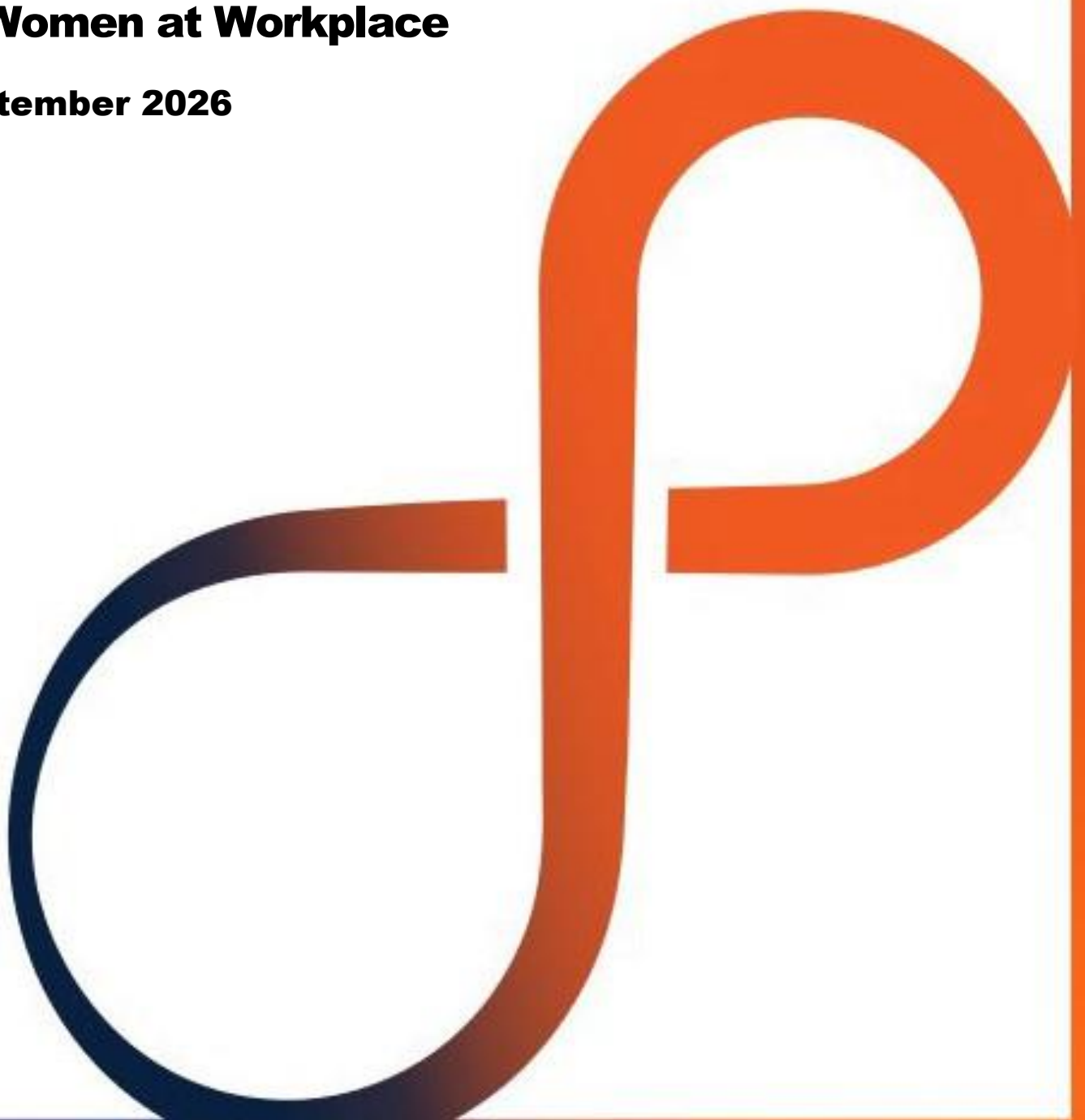




Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace

September 2026



Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace

Version	Description	Author	Approved / Reviewed By	Status	Effective Date
Baseline Policy	Global Anti-Harassment Policy	P&OD Team	Chief People Officer	Approved	August 2025
1.0	Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace	P&OD Team	Chief People Officer	Approved	January 2026
1.1	Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace	P&OD Team	Chief People Officer	Approved	September 2026

Objective

Persistent Systems Limited takes great pride in creating an environment where everyone can thrive, feel safe, equal and be included, including treating each other with respect and dignity. Persistent Systems Limited ensures to provide work environment free of any kind of harassment including sexual harassment. This policy is formulated keeping in view the provisions of The Sexual Harassment of Women at Workplace, (Prevention, Prohibition and Redressal) Act, 2013 and amendments thereto. Persistent Systems Limited promotes and follows zero-tolerance policy towards any kind of sexual harassment or any such act.

Applicability

The policy applies globally to Persistent Systems Limited, including all its subsidiaries (including step-down subsidiaries), affiliates, and associated companies and facilities that Persistent manages and its associate companies located globally across the world (collectively referred to as 'Persistent/Persistent group/Company'). It encompasses any individual employed at the Workplace, for any work on a regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise. All permanent, full-time and part-time employees including employees on probation, temporary employees, fixed term employees, interns, project trainees, job applicants, contractual consultants, retainers, vendors, visitors, suppliers and clients. Furthermore, Persistent expects its suppliers, vendors, partners, and customers to adhere to these principles and adopt similar or equivalent policies in their businesses.

Purpose and Scope

- Promoting a workplace based on equality and mutual respect.
- Providing a safe and amiable environment.
- Ensuring zero tolerance towards incidents relating to sexual harassment.
- Providing training and creating awareness regarding about the sexual harassment at workplace and consequences thereof.
- Persistent being a global company the policy is applicable globally whereas location specific laws, rules and regulations applicable to specific geography shall prevail and are followed as per requirement wherever the Company operates.
- To ensure that the investigations carried out under this policy are effective, appropriate and in line with the applicable laws, rules and regulations.
- This policy being gender specific (for women), in case the harassment is faced by opposite gender (male) the same shall be addressed in the light of Global Policy on Anti-Harassment and Prevention of Discrimination.

Definitions

Company

Company shall mean Persistent Systems Limited, including all its subsidiaries (including step-down subsidiaries), affiliates, and associated companies and facilities that Persistent manages and its associate companies located globally across the world.

Employee

Exclusively for this policy employee means a person employed at a workplace for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name, including potential employees (which will include candidates being interviewed virtually or in person).

Employer

The HR Function is the owner of this policy and the Board of Directors, vide a resolution passed on August 1, 2025, has appointed Mr. Rajiv Naithani, Chief People Officer as the 'Employer' for the purpose of this policy.

Sexual Harassment

Any harassment that is sexual in nature, including but not limited to unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, when, submission to or rejection of such conduct is used as the basis for employment decisions or such conduct has the purpose or effect of creating an intimidating, hostile or offensive working environment. Local law may further define Sexual Harassment.

Sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- i. physical contact and advances; or
- ii. a demand or request for sexual favors; or
- iii. making sexually colored remarks; or
- iv. showing pornography; or
- v. any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Workplace

The workplace includes all premises of Persistent, including but not limited to all offices at various locations globally owned and controlled by the Company. Workplace also extends to informal settings associated with work, such as food courts, recreational facilities, training programs, and any virtual platforms used for work including but not limited to virtual workplaces (which will include personal devices used for work, conversations on laptop chats, WhatsApp, SMS, and all other social media platforms.) Places visited by the employee arising out of or during the course of employment including official events, transportation and accommodation provided by the Company.

Aggrieved woman

In relation to a workplace, a woman (including a transgender woman, on submission of valid certificate of gender), of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent which includes contractual, temporary, visitors.

Respondent

Person(s) against whom a complaint of sexual harassment has been made by the aggrieved woman.

Internal Committee

Internal Committee (IC) refers to the redressal committee which is established within Persistent as per the provisions of The Sexual Harassment of Women at Workplace, (Prevention, Prohibition and Redressal) Act, 2013 and subsequent amendments thereto, to receive and inquire into complaints pertaining to incidents of sexual harassment at workplace and provide its final recommendations/report after investigating the facts of the case by just, equitable approach and present the recommendations/report to the employer /management, and ensure implementation of the approved recommendations.

Policy

- Persistent prohibits harassment of any kind, including sexual harassment, workplace harassment and shall take appropriate and immediate action in response to complaints or knowledge of violations of this policy.
- This policy is in alignment with relevant International Labor Organization (ILO) conventions wherein the term “gender-based violence and harassment” is mentioned which means violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately and includes sexual harassment.

Persistent promotes and follows zero-tolerance, non-retaliation, and confidentiality principles towards any kind of sexual harassment. Persistent conducts annual training for all employees on prevention and prohibition of sexual harassment at the workplace.

Sexual Harassment (in detail)

In addition to the definition elaborated earlier, sexual harassment further includes unwanted conduct of a sexual nature which is perceived as sexual harassment by a woman. Sexual harassment is unlawful whether it involves co-worker harassment, harassment by a supervisor or manager, or by persons doing business with or for the Company.

Actions or behavior that could be interpreted or perceived as sexual harassment are listed below. The following examples of sexual harassment and are not exclusive when determining whether there has been a violation of this policy.

Verbal/physical conduct

- Initiating or engaging in offensive communications containing sexual content.
- Subjecting woman to an unwelcome act of physical intimacy including grabbing, brushing, touching including sexual infiltrations, advances and propositions.
- Passing sexually colored remarks or remarks of a sexual nature about a person's clothing or body, including making graphic comments about another person's body.
- Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a woman's wishes.
- Physical stalking, flirting or pursuing someone against their will.
- Whistling, leering, improper gestures, offensive, derogatory or degrading remarks which may contain sexual content.
- Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy.
- Any other unwelcome physical, verbal conduct of sexual nature.

Nonverbal/virtual conduct

- Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexual demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, etc. including but not limited to sharing of any electronic material which has sexual content.
- Giving gifts or leaving objects that are sexually suggestive.
- Using jokes, personal comments, stories, questions which are sexual in nature.
- Cyber stalking and initiating harassing, threatening emails, messages, creating fake accounts for such activities, morphing images to make them sexually provocative, bullying, trolling, causing online reputation damage, cyber flashing.
- Constant watching, following, indirectly contacting a woman.
- Sending notes, letters, communication through social media containing sexual content.
- Inappropriate dressing in office or on video calls which may be offensive for women employees.
- Any other unwelcome physical, non-verbal or virtual conduct of sexual nature.

Quid pro quo

This includes demands for sexual favors as a condition of employment or in exchange for favorable or preferential treatment. The following circumstances if it occurs or is present in relation to any sexually determined act or behavior amount to sexual harassment:

- Any demand for sexual favors in exchange for promises related to employment.
- Any demand for sexual favors in exchange for implied or explicit promises of preferential/differential treatment in employment.
- Any demand for sexual favors in exchange by way of implied or explicit threats about the present or future employment status.
- Any demand for sexual favors in exchange for implied or explicit promise of preferential treatment in employment.

Sexual harassment also includes engaging in activities which may amount to sexual harassment in future and any act, action or omission which may be perceived as sexual harassment by the woman employee.

Reporting of complaint

Any woman employee who is facing any harassment, act of violence, intimidation, the threat of violence, abuse, threatening behavior or any other such kind of behavior which is perceived as sexual harassment; should be reported to the Company on the below email ID:

AHC@persistent.com.

Grievance redressal mechanism

Constitution of the Internal Committee (IC)

- The provisions for the appointment and cessation of the Presiding Officer and the Members of IC will be determined by Management from time to time with respect to the applicable provisions.
- Presiding Officer under IC, the eligibility of IC “Presiding Officer” is Senior level female woman official of the Company.
- Provided that in case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the workplace.
- Provided further that in case the other offices or administrative units of the workplace do not have a senior level woman employee, the Presiding Officer shall be nominated from any other workplace of the same employer or other department or organization.
- The IC will be constituted at every location of the Workplace in India and will be responsible to carry out the functions and obligations under this policy at its respective location.
- For each location, the IC shall have a Presiding Officer and 3 or more other members (2 / 3 of which will be employees having experience in social work or having legal knowledge and 1 of which will be an external member from NGO or having the relevant knowledge). Provided that at least one-half of the total Members so nominated shall be women. Maximum tenure of IC members - 3 years.
- Core IC (Pune) committee will be in-charge of handling the cases for any new location till the Location IC is formed and published in the policy.
- Reasons (not limited to these reasons only) for potential disqualifications of IC members:
 - a) Contravention of policy/ law.
 - b) Convicted of an offence.
 - c) Found guilty in any disciplinary proceedings.
 - d) Abused his/her position prejudicial to the public interest.
- The constitution of the core IC which will be in Pune and other locations

IC to have quarterly review to discuss

- Efforts on awareness,
- Case resolving capacity building,
- Investigative methodologies, other suggestions,
- Review cases registered, action taken, outcomes.

In criminal cases beyond the jurisdiction of IC

- Law of land shall apply.
- IC shall provide assistance required by complainant.

Timelines for major activities like

- Submission of complaints
- Initiation of investigation
- Closure of investigation
- Reporting
- Shall be summarized in one place for easy access.

Law mandate

Submission of Annual report - Before 31st January of every previous calendar year.

Responsibility of the Internal Committee

- Receiving complaints of Sexual Harassment at the Workplace and performing its duties in accordance with the law.
- Initiating and conducting inquiries as per the established procedure.
- Submitting findings and recommendations of inquiries.
- Coordinating with the employer in implementing appropriate action.
- Maintaining strict confidentiality throughout the process as per established guidelines and ensuring absolute transparency in its activities, disclosing necessary information to the respective stakeholders when required and investigating the complaints while abiding by the principles of natural justice.
- Submitting annual reports as prescribed under the acts, rules and regulation in the prescribed format.

Responsibilities of Stakeholders

All the employees of the Workplace will have the responsibility of implementing this policy.

Responsibilities of Employees

- To read, understand, and acknowledge the Prevention of Sexual Harassment (POSH) Policy.
- To ensure implementation and adhering to this policy in personal capacity.
- To report the instances of sexual harassment without any fear of any backlash.
- To attend the training provided by the Company as per the requirement.
- The incident should be reported to the Company on prescribed email id.
- To co-operate in the cases of investigation and make themselves available before the investigation team as and when required.
- To abide by the directions given by the IC.
- To not use this policy to make frivolous or malicious charges against fellow colleagues or any individuals related to the Company.

Responsibilities of the Organization

- To set up the procedure for grievance redressal in line with the applicable laws and regulations as per respective geographies.
- To set up Internal Committee for investigation of the incidents related to sexual harassment.
- To arrive at the formal or informal resolution of the complaints reported and submit the report to the Employer.
- To recommend the necessary action, or any such action(s) as per the applicable policy as per requirement against the respondent if found guilty.
- Support Internal Committee (IC) to carry out its responsibilities.
- Taking care of matters beyond IC scope (such as criminal matters, etc.)
- Regular training and awareness sessions should be conducted as a preventive action to prevent offensive work environment.
- To conduct yearly audit and updation of this policy in accordance with the applicable laws and regulations.
- Display at any conspicuous place in the workplace, the penal consequences of sexual harassments; and the order constituting, the Internal Committee.

Complaint of Sexual Harassment

- Complainant should make, in writing, a complaint of sexual harassment to IC within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident.
- The IC may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the complainant from filing a complaint within the said period.
- The complainant shall submit to IC six copies of the complaint along with supporting documents and the names and addresses of the witnesses. (in case the complaint is submitted in physical form).
- Where the aggrieved woman is unable to make a complaint on account of her physical, mental incapacity or death or otherwise, her legal heir or such other person including but not limited to relative, friend, co-worker or any person who has knowledge of the incident may make a complaint.
- (The list of persons filing complaint on behalf of aggrieved, can be referred from The Sexual Harassment of Women at Workplace Rules, 2013 including any amendments thereto).
- The form in which the complaint is required to be made is annexed as Annexure A to the Policy.

Conciliation/settlement

- Prior to initiating an inquiry, the IC may, initiate conciliation at the request of the complainant, take steps to settle the matter between the complainant and the respondent through conciliation, provided that no monetary settlement is made the basis of such conciliation
- In case a settlement has arrived at, the IC shall record the settlement so arrive and forward the same to the Company to act as specified in the recommendation of the IC.
- The IC will provide copies of the settlement as recorded to the complainant and the respondent. Upon confirmation being reached, the IC would not be required to conduct any further inquiry.
- Where no settlement has arrived or the settlement provided in the informal resolution/conciliation is not complied with, the IC shall proceed to make an inquiry into a complaint.

Manner of Inquiry into complaint

- For making an inquiry into the complaint, the IC shall have the same powers as are vested in a civil court under the Civil Procedure Code, 1908, while trying a suit.
- On receipt of the complaint, IC shall send one of the copies received from the aggrieved woman to the respondent within a period of seven working days.
- The respondent shall file his reply to the complaint along with his list of documents, and names and addresses of witnesses, within a period not exceeding ten working days from the date of receipt of the complaint copy.
- IC shall make an inquiry into the complaint in accordance with the applicable law and principles of natural justice.
- The IC shall have the right to terminate the inquiry, proceedings or to give an ex-parte decision on the complaint, if the complainant or respondent fails, without sufficient cause, to remain present for three consecutive hearings convened by the Presiding Officer, provided that such termination or ex-parte order may not be passed without giving a notice in writing, fifteen days in advance, to the party concerned.
- The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before IC.
- In conducting the inquiry, a minimum of three Members of IC including the Presiding Officer shall be present.
- The IC will meet with the complainant no later than within seven (7) days of receipt of the complaint.
- They will inform the complainant of this meeting date at the earliest.
- Where there is need for additional facts, the IC will undertake fact-finding or make necessary detailed inquiries relevant to the case. This may include personal interviews with concerned staff members, requests for documents or records and so on.
- The procedure will be thorough, impartial and objective, and carried out in a timely manner with sensitivity and due respect for the rights of all parties concerned.
- The IC shall provide every reasonable opportunity for the complainant and the respondent for putting forward and defending their respective case.
- In the event, the complaint does not fall under the purview of sexual harassment, or the complaint does not amount to an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.

- Any such inquiry must be completed, including the submission of the inquiry report, within 90 days from the date of receipt of the complaint.
- IC Presiding Officer to share all complaints with Administrator of WB (Whistle Blower) Policy on a quarterly basis.
- Steps to be taken if an IC / board member is a party involved:
 - a) Not to be a part of the proceedings of the IC.
 - b) Reporting such matters to the Board immediately.

Guidelines for carrying out virtual inquiry or conciliation

- Video conference or telephonic proceedings will be conducted only with the consent of the parties involved.
- All parties concerned will be given at least 2 days prior notice.
- Parties/witnesses will be sent a copy of the minutes of meetings or other relevant documentation via email.
- Relevant documentation will need to carry digital signatures and wet ink signatures may be taken later.
- If the parties are unwilling to or cannot attend the proceedings online, the IC may postpone the proceedings until in-person meetings are possible.
- All guidelines and rules applicable to in-person inquiries and conciliations shall apply to virtual inquiry/conciliation as well.

Action during pendency of inquiry

- During the pendency of an inquiry on a written request made by the aggrieved woman, the IC may recommend to the employer to:
 - a) transfer the aggrieved woman or the respondent to any other workplace; or
 - b) grant leave to the aggrieved woman up to a period of three months; or
 - c) grant such other relief to the aggrieved woman as may be prescribed.
- The leave granted to the aggrieved woman under this section shall be in addition to the leave she would be otherwise entitled.
- On recommendation of the IC the employer shall ensure implementation of the recommendations in line with the applicable laws, rules and regulations.

Inquiry Report

On completion of an inquiry, the IC shall provide a report of its findings to the employer within a period of 10 (ten) days from the date of the completion of inquiry and such reports will be made available to the parties concerned and the BU Head. After the completion of the inquiry, we can take the necessary action.

No action against the alleged aggrieved

Where the IC arrives at the conclusion that the allegations against the alleged respondent are not proved, then IC will not take any action against the alleged respondent.

Action against the Respondent

Where the IC arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the employer to take any action including a written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, terminating the respondent from service or undergoing a counselling session or carrying out community service, deducting the salary or any such sum as it may deem necessary, direct the respondent to pay to the complainant such sum considering the trauma suffered, loss in career, medical expenses incurred, income or financial status of the respondent or any action up to and including termination of employment.

Recommendation to Employer

The employer shall act upon the recommendation of the IC immediately within 60 days of its receipt.

Appeal

Any person aggrieved by the recommendations or non-implementation of such recommendation may prefer an appeal to the tribunal within a period of 90 days of the date of recommendation.

Frivolous or False Charges

This policy shall not be misused to bring frivolous or malicious charges against fellow colleagues or any individuals covered under this policy. Strict disciplinary action shall be taken against any individual bringing a charge of sexual harassment in bad faith. This may cause disciplinary actions including but not limited to a written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments or any component of the remuneration, terminating from service or undergoing a counseling session or carrying out community service.

SHe-Box Online Complaint Management System (Govt. of India initiative)

SHe-Box is an initiative of Government of India to provide a single window access to every woman employee, irrespective of her work status, whether working in organized or unorganized, private or public sector, to facilitate the registration of complaint related to sexual harassment at workplace. Any woman employee facing sexual harassment at workplace can register her complaint through this portal.

This SHe-Box is in addition to all the existing mechanisms established in India by the Government and as provided under the law. [SHe BOX](#) for more info on SHe-Box.

Confidentiality

Cases that involve allegations of sexual harassment are especially sensitive and confidential and special attention will be given to the issue of privacy for all individuals. No publication or communication of such information will be made to the public, press and media except where the information must be disseminated for securing justice. Information will be released only on a need-to-know basis.

Confidential information includes:

- a) Contents of complaint.
- b) Details of parties involved.
- c) Conciliation or formal inquiry related information.
- d) Committee recommendation.
- e) Action taken by Persistent.

During in-person or virtual proceedings, parties involved are prohibited from recording, circulating revealing/ discussing matters related to the in-person or virtual proceedings.

No Retaliation

This policy strictly prohibits any kind of intimidation or harassment of individuals who have filed complaints, instituted proceedings, assisted in investigations, or formally or informally objected to the incidents of sexual harassment, irrespective of the final outcome.

Persistent will take strict action against those employees/individuals who would indulge in such retaliatory actions.

Zero Tolerance

Persistent upholds a zero-tolerance policy for all forms of harassment including sexual harassment along with no-retaliation principle. Any violations will lead to corrective or appropriate action taken in case of any incident of sexual harassment.

Review of the Policy

The policy has been approved by the Chief People Officer and Board of Directors. This will be reviewed at least annually by the owner of this policy viz, People & Org Development.

ANNEXURE A
Proforma for lodging a complaint:

Complaint Details:

1. Date of Occurrence of the Incidence:
2. Venue of Occurrence of the Incidence:
3. Employee Id of the Accused (if available):
4. Name of the Accused:
5. Project Name, BU Name of the Accused (if available):
6. Relationship between respondent and complainant at work:
7. Non-employee complainant (interns, consultant, contract consultant, vendor representative)
mention name of employer, nature of relationship with PSL.
8. Witness, if any:

Name:

Description of the Complaint:

Declaration

I hereby acknowledge that the above information provided by me is true. I am aware that any malicious, frivolous charges made by me will result in a strict action against me under contract, equity and law.

Complainant's Signature:

Date:

Place:

About Persistent

Persistent Systems (BSE: 533179 and NSE: PERSISTENT) is a global services and solutions company delivering AI-led, platform-driven Digital Engineering and Enterprise Modernization to businesses across industries. With over 27,500 employees located in 18 countries, the Company is committed to innovation and client success. Persistent offers a comprehensive suite of services, including 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 Best-in-Class World Index. The Company has achieved carbon neutrality, reinforcing its commitment to sustainability and responsible business practices. Persistent has also been named one of America's Greatest Workplaces for Inclusion & Diversity 2025 by Newsweek and Plant A Insights Group. As a participant of the United Nations Global Compact, the Company 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 468% growth in brand value since 2020, Persistent is the fastest-growing IT services brand in 'Brand Finance India 100' 2025 Report.

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