Persistent

Human Rights Due-Diligence Process

October 2026

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Introduction

At Persistent Systems, respect for human rights is integral to our business operations, culture, and value chain. Our approach is guided by internationally recognised frameworks, including the United Nations Global Compact (UNGC), the United Nations Guiding Principles on Business and Human Rights (UNGPs), and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We are committed to upholding dignity, equality, inclusion, and fair treatment across the employee lifecycle and throughout our business relationships. Through our policies, governance mechanisms, due diligence processes and grievance mechanisms, we identify, assess, prevent, mitigate, monitor and, where necessary, remediate actual and potential adverse human rights impacts across our operations and value chain.

Human Rights Policies and Governance Framework

To uphold fairness, integrity, and respect for human dignity across our organization and supply chain, we have established comprehensive policies and codes of conduct. These frameworks form the foundation of our commitment to ethical business practices, fostering a culture of accountability, inclusivity, and social responsibility. These policies establish expectations and controls for managing human rights risks across our operations and relevant business relationships.
The following key policies define our approach to human rights and business ethics:

- Human Rights Policy
- Anti-Harassment Policy
- Anti-Human Trafficking Policy
- Diversity and Inclusion Policy
- Whistle Blower Policy
- Vendor Code of Conduct
- Data Privacy Policy
- Environmental Health and Safety

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- Equal Employment Opportunity Policy
- Privacy Policy
- Responsible AI Policy

Human Rights Due-Diligence Process

Persistent's Human Rights Due Diligence (HRDD) framework is designed to identify, assess, prevent, mitigate, and monitor potential adverse human rights impacts across our operations, supply chain, and business relationships. The framework is aligned with the UN Guiding Principles on Business and Human Rights and is integrated into our enterprise risk management processes. Human rights assessments are conducted across:

- Own operations and workplaces
- Suppliers, contractors, and business partners
- New business relationships, including mergers, acquisitions, and joint ventures
- Periodic risk reviews to identify emerging human rights risks

Findings are reviewed by relevant functions and mitigation measures are implemented where required.

Governance and accountability

The Human Rights Due Diligence process is coordinated by Human Resources Team with participation from ESG, Procurement, Legal and Compliance, Admin, Information Security and Internal Audit teams. Material human rights risks and overdue corrective actions are escalated to relevant heads. The framework is reviewed annually and additionally upon significant changes in operations, geographies, business relationships or regulatory requirements.

Human rights risk-assessment methodology

Potential human rights impacts are assessed using criteria relating to severity, scale, scope, likelihood and ability to remediate. The assessment considers geographic exposure, nature of work, workforce category, supplier category, vulnerable groups, regulatory context, grievance trends, audit observations and changes in business relationships. Risks are prioritised based on the potential impact on people, rather than financial impact to the company alone.

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Key Human Rights Issues Addressed

Our due diligence framework focuses on mitigating actual and potential human rights risks, including:

- Freedom of association and the right to collective bargaining
- Human Trafficking, Modern Slavery Child Labor and Forced or Compulsory Labor
- Non-discrimination at workplace
- Prevention of Sexual Harassment
- Rights of Indigenous Peoples
- Fair Compensation & Work-Life Balance
- Employee Health and safety
- Data Privacy
- Responsible AI
- Digital accessibility and inclusion

Protecting Vulnerable Groups

Persistent Systems ensures fair and ethical treatment of at-risk groups by implementing specific policies and safeguards for:

- Own employees – Ensuring equitable treatment and access to grievance mechanisms.
- Women – Advancing gender equality and workplace inclusivity.
- Children – Preventing child labour in our operations and supply chain
- Third-party employees – Extending protections to contract workers and vendors
- Local communities – Engaging responsibly to prevent adverse social impacts
- Indigenous People
- Migrant workers

Strengthening Compliance & Awareness

Require suppliers to comply with applicable human rights requirements:

- Require suppliers to comply with the UN Guiding Principles on Business and Human Rights and respect internationally recognized human rights as part of their contractual obligations.
- Conduct supplier due diligence and audits to monitor compliance.
- Provide training programs to educate employees and business partners.
- Maintain grievance mechanisms for reporting violations confidentially
- Ensure continuous monitoring and remediation of identified risks

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Human Rights Practices and Due Diligence in Our Supply Chain

Persistent expects suppliers, contractors, and business partners to uphold internationally recognised human rights principles and comply with applicable labour, health and safety, environmental, and ethical business requirements. Human rights considerations are integrated into supplier onboarding, due diligence, contractual requirements, and ongoing monitoring processes. Supplier assessments focus on areas such as forced labour, child labour, human trafficking, workplace conditions, discrimination, freedom of association, and responsible business conduct. Appropriate corrective actions are implemented where risks are identified.

Suppliers are required to acknowledge and comply with the Vendor Code of Conduct, and Persistent continues to work towards 100% acceptance across the applicable supplier population. The human rights due diligence process identifies and assesses potential risks and impacts related to respecting human rights in our value chain or business activities. 100% of our suppliers working on our premises were assessed on human rights in FY2025-26

Vendors must self-monitor, comply with the Code, maintain accurate documentation, audit their activities, and share reports with Persistent upon request. 100% of our suppliers working on our premises were assessed on human rights in FY 2025-26 and zero risks were identified.

Processes implemented to mitigate risk to Human Rights

Persistent System's Human Rights policy provides a clear framework to uphold these principles across all operations. We use a Compliance Management tool with geography-specific checklists and conduct due diligence aligned with ISO 45001 standards. Vendor partners on our premises are evaluated for statutory compliance, and we offer ESG and Human Rights awareness training for suppliers.

Our Human Rights Assessment includes preventive, detective, and corrective controls to manage violations within our operations and value chain. Risk assessment covers employees, contractors, children, women, suppliers, and local communities. We require suppliers to respect human rights in their services. Human Rights assessments occur quarterly; all India operations have undergone internal audits, and we hold ISO14001:2015 and ISO 45001:2018 certifications from an external agency. Overseas processes are subject to applicable local legal and regulatory requirement.

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GRI Disclosures – Social and Human Rights

GRI disclosures related to Social and Human Rights have been subjected to limited assurance by an independent third party. Refer to Independent Assurance statement

GRI Standard	Indicator(s)	Theme	Focus Area	Human Rights Relevance
GRI 401: Employment 2016	401-1, 401-2, 401-3	Employment Practices	New employee hires, benefits, parental leave	Right to work, fair conditions, family life
GRI 402: Labor/Management Relations 2016	402-1	Labor Practices	Notice periods for operational changes	Right to information, participation
GRI 403: Occupational Health and Safety 2018	403-1 to 403-10	Health & Safety	Management systems, hazard identification, worker participation, training, performance	Right to life, safe working conditions
GRI 404: Training and Education 2016	404-1, 404-2, 404-3	Capacity Building	Training hours, programs, career development	Right to education, development
GRI 405: Diversity and Equal Opportunity 2016	405-1, 405-2	Inclusion & Equality	Diversity metrics, equal remuneration	Right to non-discrimination, equal pay
GRI 406: Non-discrimination 2016	406-1	Non-discrimination	Incidents and actions taken	Right to equality, dignity
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1	Labor Rights	Respect for union rights	Freedom of association, collective bargaining
GRI 408: Child Labor 2016	408-1	Child Protection	Risk of child labor	Protection from exploitation

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GRI 409: Forced or Compulsory Labor 2016	409-1	Labor Rights	Risk of forced labor	Freedom from slavery
GRI 410: Security Practices 2016	410-1	Security & Human Rights	Security personnel training	Protection from abuse
GRI 411: Rights of Indigenous Peoples 2016	411-1	Indigenous Rights	Violations of rights	Cultural and land rights
GRI 413: Local Communities 2016	413-1, 413-2	Community Engagement	Impact assessments, engagement	Right to participation
GRI 414: Supplier Social Assessment 2016	414-1, 414-2	Supply Chain	Screening, impact assessments	Responsible sourcing
GRI 415: Public Policy 2016	415-1	Governance	Political engagement	Transparency, accountability
GRI 416: Customer Health and Safety 2016	416-1, 416-2	Consumer Protection	Safety assessments, incidents	Right to health, safety
GRI 417: Marketing and Labelling 2016	417-1, 417-2, 417-3	Consumer Rights	Product info, marketing practices	Right to informed choice
GRI 418: Customer Privacy 2016	418-1	Data Protection	Privacy complaints	Right to privacy

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Human and Labour Rights Risks and Mitigation Measures- Aligned with our commitments under the UN Global Compact and other applicable human rights frameworks.

Materiality: The following are identified as human and labor rights topics relevant to our operations and value chain. There is a policy commitment regarding these human rights and labor rights areas, which is aligned with international standards, approved at the highest company level, and applied across the company's operations and value chain, including suppliers, communities, and other business relationships.

Human Rights Risks	Processes implemented to mitigate human rights risks	Type of remediation actions taken
Freedom of association and the right to collective bargaining	Persistent Systems Limited recognises and respects employees' fundamental rights to freedom of association and collective bargaining, in line with applicable labour laws and international human rights principles, including ILO Conventions. Employees are free to form, join, or choose not to join associations, trade unions, works councils, or collective bargaining bodies, without fear of retaliation, discrimination, intimidation, or harassment. While participation in such structures is voluntary, we foster open dialogue through policies, forums, and support groups to address concerns fairly and transparently. Our Human Rights Policy and Supplier Code of Conduct extend these commitments across our supply chain, ensuring that freedom of association and collective bargaining rights are upheld consistently.	Persistent Systems is committed to fostering a respectful and compliant workplace. While formal engagement mechanisms with worker representatives are not currently in place, we operate in alignment with local regulations, which in certain regions do not require union-related disclosures. We continue to monitor regulatory developments to ensure our practices remain appropriate and responsive. "We regularly engage with employees through various forums such as town halls, all-hands meetings, business unit connections, employee engagement surveys, Employee Resource Groups (ERGs) and committees. We have several committees at the workplace to collaborate with members of the committee on working conditions. Employees can raise their concerns in these forums and through employee engagement surveys. The insights from these inputs are thoroughly examined to identify actionable items to address the concerns raised. During FY 2025-26, none (ZERO) of our employees were represented by an independent trade Union or covered by Collective Bargaining Agreements (CBAs)
Human Trafficking, Modern Slavery Child Labor and Forced or Compulsory Labor	At Persistent Systems, we maintain a strict zero-tolerance policy against child labor, forced labor, and all forms of modern slavery across our operations and supply chain. Guided by the Commonwealth Modern Slavery Act (2018), the UN Declaration of Human Rights, and International Labor Organization (ILO) conventions, we uphold the highest ethical standards in labor practices. Our Anti-Human Trafficking Policy and Vendor Code of Conduct mandate strict adherence to local and international labor laws, ensuring our partners and	No operations or suppliers within the assessed scope were identified as having a significant risk of child labour, modern slavery, forced labour or compulsory labour.. Where concerns are identified, they are subject to investigation, corrective action and follow-up monitoring in accordance with established processes. Refer to **Slavery and Human Trafficking Statement**

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	suppliers comply with ethical sourcing and fair labor standards. Through rigorous supplier due diligence, risk assessments, and regular audits, we proactively mitigate risks of forced or child labor. Additionally, we reinforce responsible labor practices through continuous awareness programs and compliance training for employees and business partners.	
Non-discrimination at workplace	At Persistent Systems, we are committed to fostering a workplace that upholds the principles of equality, fairness, and respect. We strictly prohibit any form of discrimination based on gender, age, race, ethnicity, disability, religion, sexual orientation, or any other protected characteristic, including political opinion and social origin. Our Diversity and Inclusion Policy, along with our Anti-Harassment Policy, ensures a safe, inclusive, and supportive environment for all employees. Additionally, our Whistleblower Policy provides a secure mechanism for reporting any discriminatory practices, reinforcing our commitment to equal opportunities and a biasfree workplace. Human rights principles are integrated into our Code of Conduct (CoC) training programs, ensuring awareness and compliance across all levels of our organization. From new hires to security personnel, every employee, including contract workers, undergoes training on human rights policies and procedures.	Reported concerns are reviewed and investigated under established grievance procedures. Where allegations are substantiated, appropriate corrective and disciplinary actions are taken, and preventive measures are implemented where required.
Prevention of Sexual Harassment	Our workplaces across different geographies are governed by robust safety policies that align with local regulatory requirements. Beyond compliance, we uphold a strong organizational commitment to maintaining harassment-free workplaces, reinforcing our zero-tolerance approach to any form of misconduct, including sexual harassment. **Training & Awareness on Human Rights:** Human rights principles are integrated into our Code of Conduct (CoC) training programs, ensuring awareness and compliance across all levels of our organization. From new hires to security personnel, every employee, including contract workers, undergoes training on human rights policies and procedures.	Complaints are addressed through established reporting and investigation mechanisms. Where complaints are substantiated, appropriate corrective and disciplinary measures are undertaken in accordance with applicable policies and law.
Rights of Indigenous	Respect for indigenous rights and cultural heritage is embedded in our corporate responsibility framework. We are committed to	We actively engage with local communities to foster inclusion, collaboration, and sustainable development, ensuring that our

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Peoples	ethical business practices that safeguard the rights, traditions, and lands of indigenous communities. We actively engage with local communities to foster inclusion, collaboration, and sustainable development, ensuring that our initiatives contribute to their well-being without compromising their cultural integrity. Our projects and partnerships align with the United Nations Guiding Principles on Business and Human Rights, with the objective of identifying, preventing and mitigating potential adverse impacts on Indigenous Peoples, where relevant.	initiatives contribute to their well-being without compromising their cultural integrity.
Fair Compensation & Work-Life Balance	Persistent Systems ensures that all employees are paid above the statutory minimum wage in accordance with the applicable labor laws each country we operate in. Living wage benchmarking - Living wage assessments are conducted regularly to cover basic expenses such as food, housing, and clothing while ensuring competitiveness and social responsibility. This process compares wages with living wage standards in operational regions to ensure compensation meets or exceeds the cost of living. Additionally, an analysis of saving potential is performed to confirm that salaries allow for a certain level of saving after accounting for the standard cost of living. Our fair compensation framework aligns with global labor standards and collective bargaining agreements, ensuring equal pay for equal work, competitive remuneration, and compliance with industry regulations. We provide comprehensive benefits, including hybrid work, parental leave, sabbaticals, and CSR related time off, fostering a supportive work environment.	Our Gender Pay Gap review is conducted continuously with monthly updates to the data. This data is available at the organization level, across business units, and grade levels. Gender parity is evaluated during all promotion cycles. In our recent assessment for this financial year, no significant gaps were identified. In the past, several initiatives have been implemented based on our Gender Gap review. We remain committed to pay equity and will continue to implement initiatives proactively should any material disparities be identified in future assessments.
Employee Health and Safety	At Persistent Systems, we are committed to fostering a culture of safety awareness and proactive risk management. Our approach to Occupational Health & Safety (OHS) is built on a robust Environment, Health and Safety (EHS) Management System, reinforced by EHS policies, safety programs, and regular training sessions. We ensure a safe and ergonomic work environment, prioritizing the well-being of our employees	93% of our global facility area is certified under an Environmental Health & Safety Management system.
Data Privacy	We employ Data Privacy principles, ensuring that data protection measures including customer security are integrated at every stage of data collection, processing, and storage	Security Awareness and Employee Training Recognizing that human awareness is a key defense against cyber threats, Persistent Systems have implemented the “Ctrl-Alt-Defend”

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	covering 100% of our operations. Persistent System's Privacy Information Management System (PIMS) is aligned with global privacy regulations and international standards, including but not limited to: \ General Data Protection Regulation (GDPR) California Consumer Privacy Act (CCPA) \ ISO 22301, ISO 27001, ISO 27701, ISO 27018 ISO 42001	initiative, fostering a security-first culture among employees, contractors, and partners. All employees and third-party users are required to undergo annual mandatory training on security policies and procedures, which includes regular updates. New joiners must complete the training upon onboarding, while all employees undergo annual compliance trainings.
Responsible AI	Persistent assesses human rights considerations associated with the responsible adoption of AI, including potential impacts relating to privacy, bias and discrimination, transparency and human oversight. Relevant AI applications are subject to the Company's applicable AI governance and risk-management processes.	Where concerns are identified, affected use cases are reviewed and appropriate corrective measures are implemented, including strengthening data, process or governance controls as applicable
Digital accessibility and inclusion	Accessibility and inclusive-design considerations are incorporated, where applicable, into relevant digital products, workplace technologies and employee processes. Identified accessibility barriers are assessed and reasonable accommodations are provided in accordance with applicable requirements	

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Human Rights Risk Mitigation and Remediation Action Process

In alignment with our Human Rights Policy and based on a thorough risk assessment, we have identified key areas that could potentially impact human rights. To proactively address these, we have established a robust framework that includes mitigation strategies and, where necessary, remediation measures. Evaluations conducted by both our internal audit team and independent external auditors during the assessment period confirmed that no human rights issues were identified, and therefore, no remediation actions were required. Persistent Systems maintains strong safeguards to manage and mitigate human rights risks across 100% of its operations and value chain. We follow structured processes to continuously identify, assess, and address potential risks through targeted, site-specific mitigation efforts.

Human Rights Mitigation & Remediation

To prevent and mitigate the risks and impacts related to human rights and labor rights, the company has implemented the following actions:

- Provided internal training/ capacity building for the direct workforce
- Built capacity among relevant business relationships (e.g., suppliers, consumers, communities)
- Conducted an audit process and/or corrective action plan
- Set annual targets/ goals, track progress over time

Goals and Progress

<table>
<tr><th>Human Rights focus</th><th>Goals</th><th colspan="3">Progress</th></tr>
<tr><td>Employee health, safety and security</td><td>Maintain zero accidents in the workplace</td><td colspan="3">Zero accidents reported</td></tr>
<tr><td rowspan="4"></td><td rowspan="4">Zero tolerance for unethical and non-compliant behavior</td><td>Category</td><td>Cases Received</td><td>Cases Resolved</td></tr>
<tr><td>Discrimination</td><td>0</td><td>0</td></tr>
<tr><td>Sexual Harassment</td><td>3*</td><td>3</td></tr>
<tr><td>Office Harassment</td><td>2*</td><td>2</td></tr>
</table>

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Human trafficking, child labor and forced labor	**No child or forced labor**	**Cate gory**	**Cases Received**	**Cases Resolv ed**
		Child labor and forced labor	0	0
Diversity and Inclusion	**To include people of all genders, ethnicities, sexual preferences, religions and specially abled persons in our diverse workplaces and aim for 35% gender diversity by FY2030**	29.63% Women in workforce 58 Specially abled people 64 Nationalities		

* All cases were resolved within prescribed timelines

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Human Rights Assessment Coverage and Mitigation - Three-Year Period (FY23-FY26)

Assessment Category	Basis of Reporting	% of Category Assessed in the Last Three Years	% of Assessed Category Where Human Rights Risks Were Identified	% of Identified Risks for Which Mitigation Actions Were Implemented
Own Operations	Locations	100%	0%	0%
Contractors and Tier 1 Suppliers	Number of Tier 1 Suppliers	100%	0%	0%
Joint Ventures (>10% stake)	Not Applicable	Not Applicable	Not Applicable	Not Applicable

No material human rights risks were identified through the formal assessment process during the reporting period. Human rights risks continue to be monitored through audits, grievance mechanisms, supplier due diligence, management reviews and corrective action tracking.

Persistent Systems has conducted human rights risk assessments to identify, mitigate, and address potential adverse impacts. All owned facilities (100% across 6 locations) were audited in accordance with GRI indicators. Based on the site assessments, certain observations and recommendations for improvement were identified. Appropriate actions have since been implemented to mitigate and remediate human rights related issues. Refer to table

S.No	Location Name	City	Country
1	Pune-Bhageerath	Pune	India
2	Pune-AR-PG	Pune	India

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3	Pune – Vedas Complex	Pune	India
4	Pune-Ramanujan	Pune	India
5	Goa-Charak Bhaskar	Goa	India
6	Nagpur-Gargi Maitreyi	Nagpur	India

Plans and corrective actions.

Freedom of Association and Collective Bargaining	Employee health, safety and security	Data Privacy and Protection	Human Trafficking, Child labor, and Forced labor	Diversity and Inclusion	Responsible AI	Digital Accessibility & Inclusion
Risk	Risk	Risk	Risk	Risk	Risk	Risk

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Withholding employee rights to expression and association	Sexual harassment or any other harassment based on other harassment based on age, race, national origin, ethnicity, cultural and geographical background, gender, sexual orientation, religion, marital status, any medical conditions, or any other personal or physical aspect, intimidation in any form and other unsafe conditions arising from internal or external conditions	Non-compliance to data privacy laws across the globe may lead to penalties and may impact company's brand image.	Violating human rights	Discrimination on age, race, national origin, ethnicity, cultural and geographical background, gender, sexual orientation, religion, marital status, any medical conditions, or any other personal or physical aspect.	Potential bias or discrimination arising from AI-enabled systems or automated decision-making	Digital products, workplace technologies or processes may create accessibility barriers for persons with disabilities
Violating regulatory requirements	Violating regulatory requirements	Non-adherence to contractual requirements/obligations may lead to contractual penalties	Exploitation of children (any person below the age of 18 years)	A non-inclusive workplace for diverse employees	Inappropriate processing or use of personal data in AI systems Potential misuse of AI-enabled solutions resulting in adverse impacts on individuals	Risk of exclusion from employment-related opportunities, information or workplace systems due to accessibility barriers

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	Unsafe and unhealthy workplace	Personal data breaches of employees or others can cause distress to data subjects whose personal data has been breached	Forced labor		Inadequate transparency or human oversight in the use of AI	Inadequate provision of reasonable workplace accommodation
Mitigation and Remediation Action						
Ensure employee rights to expression and association within the realm of legal framework in each of our locations	Zero-Tolerance anti-sexual harassment governance through policies like Anti-Harassment Policy EHS Policy	Robust Privacy Information Management System (PIMS) aligned to ISO 27701 to safeguard personal data and ensure compliance with applicable legal, regulatory, and contractual obligations pertaining to data privacy and protection	Anti-human trafficking, child labor and forced labor policy in place.	Clear policies in place – Diversity Equity and Inclusion (DEI) Equal Employment Opportunity Robust grievance redressal mechanisms	AI governance through an ISO 42001:2023-aligned Artificial Intelligence Management System, addressing bias, discrimination, privacy, transparency and human oversight risks.	Accessibility and inclusive-design considerations incorporated into relevant digital solutions, workplace technologies and employee processes.
Strong anti-retaliatory grievance redressal mechanisms	Mandatory training on Safe Workplace for all employees and contractors Mandatory Code of Conduct	Robust Information Security Management System (ISMS) aligned to ISO	Adequate checks in place at all entry points to prohibit employment of people below 18 years.	DEI sensitization and awareness for managers, employees and contractors Unconscious bias training across all levels	Identified AI-related concerns are reviewed and appropriate corrective controls implemented.	Identified accessibility barriers are addressed through reasonable accommodation and

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	training as a part employee induction programs Awareness sessions on occupational health related topics	27001. ISO 42001:2023 Artificial Intelligence Management System ISO 22301:2019 Business continuity		of the Organization		appropriate corrective measures.
	Persistent Internal audit team proactive conducts risk assessments to identify hazards for all existing / new / modified activities, process, products or services and implement measures to minimize or control impacts, and monitor them in a structured manner		Periodic assessments to ensure compliance	Employee Resource Groups to help create a safe, inclusive and respectful workplace for minority groups Gender Pay Gap assessments to ensure equal pay for equal work		

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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 28,500 employees located in 21 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 Sustainability 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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