Persistent

Global Policy on Anti-Harassment and Prevention of Discrimination

September 2026

Global Policy on Anti-Harassment and Prevention of Discrimination

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 harassment based on gender, gender identity and expression, race, colour, religion, caste, creed, lingual, social origin, national origin, age, ethnicity, cultural and geographical background, marital status, social class, economic status, political ideology, political opinion and inclination, social ostracization, sexual orientation or other protected classifications, disability, any medical conditions, or any other personal or physical aspect. Persistent Systems Limited promotes and follows zero-tolerance policy towards any kind of harassment and discrimination.

Applicability

The policy applies globally to Persistent Systems Limited, including all its subsidiaries, affiliates, and associated companies (collectively referred to as 'Persistent'). It encompasses all employees, including part-time staff and contractors. Furthermore, Persistent expects its suppliers, vendors, partners, and customers to adhere to these principles and adopt similar or equivalent policies in their businesses. The policy will also cover anyone connected with Persistent's business including applicants for employment, trainees, retainers, consultants, visitors. This policy is gender neutral and is aimed at protecting the interests of all individuals to whom this policy is applicable.

Definitions

- 'Company' shall mean Persistent Systems Limited, its subsidiary companies and its associate companies located globally across the world.
- 'Employee' means any person employed in the Company for any work on a regular, temporary, voluntary, ad-hoc basis either directly or through an agent, including co-workers, contractors, contract workers, probationers, consultants, trainees.
- 'Employer' means the policy is applicable to Persistent Systems Limited, its subsidiary companies and its associate companies working anywhere globally. 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.

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- ‘Harassment’, for purposes of this policy, is defined as unwarranted conduct that has purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating, demeaning or offensive environment. Harassment can be based on aspects including but not limited to gender, race, religion, national origin, age, sexual orientation or other protected classifications etc., directed towards a specific person(s), and which affects the working environment adversely. Harassment may take place at work, work related events / activities / outside workplace and may occur during or after office hours. Such act of Harassment can be perpetrated by one individual or more than one individual (group).

  a. Verbal harassment includes comments whether direct or indirect, that are offensive or unwelcome regarding an individual’s nationality, race, color, religion, age, sex, sexual orientation, medical condition, appearance, disability, gender identity or expression, marital status etc.
  b. Non-verbal harassment includes distribution, display or discussion of any written, graphic, or digital material that ridicules, insults, belittles or demonstrates hostility, aversion or disrespect towards an individual or group because of nationality, age, race, color, religion, gender, sexual orientation, disability, sexual identity, marital status etc.

- ‘Discrimination’ may vary based on local laws. For purposes of this policy, Discrimination is defined as treating a person or group of people differently, or less favorably because of a specific characteristic.

- ‘Zero tolerance’- All harassment or discrimination claims are handled with confidentiality, care and non-retaliation. In case the alleged harassment or discrimination is proved beyond reasonable doubt and after following the due process of law, appropriate actions including disciplinary action, oral/written warning, dismissal, transfer etc. or legal steps will follow.

Policy

Persistent prohibits harassment and discrimination 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 on workplace dignity and non-discrimination. In furtherance, Persistent conducts training for all employees including contractors and vendors on discrimination and harassment in the workplace.

Harassment

Harassment includes indulging in unwarranted conduct that has purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating, demeaning, or offensive environment.

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

- threatening and intimidating behavior of any kind towards any individual
- participating in hostile acts
- initiating or engaging in offensive communications either written or verbal
- using jokes, comments, epithets, stories, questions, stereotyping, and derogatory comments towards an individual, characteristic or group of people
- displaying or sharing offensive material either online or offline

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 further includes harassment of any individual by same-sex or opposite sex individual, regardless of gender or sexual orientation. 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:

- initiating or engaging in offensive communications containing sexual content
- using jokes, personal comments, stories, questions which are sexual in nature
- engaging in unwanted touching of any kind or invasion of personal space
- flirting or pursuing someone against their will
- whistling, leering, improper gestures, offensive, derogatory or degrading remarks which may contain sexual content
- making graphic comments about another person’s body
- initiating quid pro quo, or “this for that”, demands for sexual favors as a condition of employment or in exchange for favorable or preferential treatment
- engaging in activities which may amount to sexual harassment in future
- activities perceived as sexual harassment by the victim

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Workplace Harassment

Workplace harassment is repeated harmful or mean-spirited, targeted behavior, which is intimidating, threatening, demeaning, or humiliating for an individual. This type of harassment may render the workplace hostile for the individuals facing such harassment and creates an environment of fear amongst fellow employees.

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

- participating in public ridicule, written or verbal
- usage of unparliamentary language at workplace
- passing derogatory comments and remarks which demean and affect dignity of an individual
- intentionally sabotaging the work of another individual
- shouting, yelling or other aggressive communication at workplace, includes both written and verbal communication
- publicly shaming an individual directly or indirectly
- using offensive nicknames
- physical assault including but not limited to pushing, shoving, kicking, poking, and tripping
- threatening physically, verbally or written
- making intimidating gestures
- inflicting intentional and targeted damage to an individual's property at workplace

Disciplinary actions

Escalation and Investigation Process: The Company has a defined escalation process for reporting incidents specific to discrimination and/or harassment.

Subject to local laws and regulations, a violation of this policy will result in disciplinary action, which may result in any action including but not limited to issuance of warning, termination of employment etc.

Any employee who is facing such harassment or discrimination or any act of violence, intimidation, the threat of violence, abuse, physical retaliation or other threatening behavior; should be reported to the Company on **AHC@persistent.com or ethics@persistent.com.**

Grievance redressal mechanism

On receiving a complaint/grievance, the appointed chairperson for the Anti-Harassment committee at Pune, IND Headquarters will initiate the process for grievance redressal by setting up a local investigating team as per local laws, considering the nature of the incident as per requirement. (Disciplinary, Policy for prevention of sexual harassment etc.).

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Any incident or complaint under this policy shall be investigated in the light of the applicable policy of the Company and the applicable local laws. The Company does not tolerate retaliation and discrimination against any individual who submits any incident or complaint in good faith to report violation or possible violation of this policy. Confidentiality shall be maintained at the time of handling such complaints, the information and allied data related to the complaint and will be made available only on a need-to-know basis.

Responsibilities of Employees

- To report the instances of harassment without any fear of any backlash to Global Policy on Anti-harassment and Prevention of Discrimination should be reported to the Company on **AHC@persistent.com.**
- To co-operate in the cases of investigation and make themselves available before the investigation team as and when required.
- 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
- To conduct independent investigation of the cases of harassment or discrimination reported
- To arrive at the formal or informal resolution of the complaints reported and submit the report to the Employer
- To recommend the necessary disciplinary action, or any such action(s) as per the applicable policy as per requirement against the individual
- Support the investigation team to carry out investigation and allied responsibilities

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 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 the respondent from service or undergoing a counseling session or carrying out community service.

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 discriminatory practices, irrespective of the final outcome.

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The severity of disciplinary action will be proportionate to the nature, frequency, and impact of the discriminatory behavior or harassment, ensuring consistency and fairness in enforcement.

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 discrimination, harassment, and retaliation. Any violations will lead to corrective or appropriate disciplinary action taken in case of discriminatory behavior or harassment.

Review of the Policy

The policy has been approved by the Board of Directors and will be reviewed at least annually by the owners of this policy viz, People & Org Development. This policy and its stakeholders will be governed by the Stakeholders Relationship Committee (SRC) and ESG Committee of the Board. The People & Org Development will consult the above Committee for proposed changes if any, in its periodical review.

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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:

Employee Code:

Name:

Description of the Complaint:

Declaration

I hereby acknowledge that the above information provided by me is true to my knowledge. I am aware that any malicious, frivolous charges made by me will result in a strict disciplinary action leading up to but not limited to my termination.

Employee signature:

Date:

Place:

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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 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.

www.persistent.com

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