

## **TABOOLA INDIA PRIVATE LIMITED**

### **Sexual and Other Unlawful Harassment Policy**

Taboola is committed to providing a work environment that is free of illicit harassment. As a result, the Company maintains a strict policy prohibiting sexual harassment and harassment, against applicants and employees based on any legally-recognized basis, including, but not limited to: race, color, religion, sex, creed, sexual orientation, gender (including gender identity or expression), national origin, ancestry, alienage, citizenship, age, disability, genetic information or carrier status, protected military or veteran status, pregnancy, childbirth and related medical conditions, HIV status, status as a victim of domestic violence, stalking or sex offense, marital status, caregiver status, domestic partnership, or civil union status, familial status, consumer credit history, unemployment status, or any other characteristic protected by applicable law. All such harassment is prohibited.

Our anti-harassment policy applies to all persons involved in our operations and prohibits harassing conduct by any individual employed or engaged by Taboola, including nonsupervisory employees, supervisors, managers, and third parties, such as vendors, clients, or temporary or seasonal workers, and visitors. If such harassment occurs on the job by someone not employed by Taboola, the procedures in this policy should be followed.

### **SEXUAL HARASSMENT**

This policy has been framed in consonance with applicable law and has been introduced to prohibit, prevent and redress grievances of workplace sexual harassment in a time bound and sensitive manner. Sexual harassment is strictly prohibited under law and this policy. For the purpose of this sexual harassment policy, it is clarified that 'workplace' also includes any place visited by an employee arising out of or during the course of employment, including transportation provided by the Company.

#### ***Sexual Harassment Defined***

Sexual Harassment means any one or more of the following unwelcome acts or behaviour:

- (a) physical contact and advances; or
- (b) a demand or requests for sexual favors; or
- (c) Making sexually coloured remarks; or
- (d) Showing pornography; or
- (e) Any other unwelcome physical, visual, verbal or non-verbal conduct of a sexual nature.

Further, the following circumstances may amount to sexual harassment if it occurs or is present in relation to any other act of Sexual Harassment:

- Submission to such conduct is made a term or condition of employment; or
- Implied or explicit promise of preferential / detrimental treatment in employment;

- Submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual;
- Such conduct has the purpose or effect, of unreasonably interfering with an employee's work performance or creating an intimidating, hostile, or offensive working environment; or
- Humiliating treatment likely to affect health or safety.

A non-exhaustive list of behaviours that would be considered sexual harassment has been provided below:

- Unwanted sexual advances.
- Offering employment benefits in exchange for sexual favors.
- Making or threatening reprisals after a negative response to sexual advances.
- Visual conduct: leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons, posters, websites, emails, or text messages.
- Verbal conduct: making or using derogatory comments, epithets, slurs, sexually explicit jokes, or comments about an employee's body or dress.
- Verbal sexual advances or propositions.
- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, suggestive or obscene letters, notes, or invitations.
- Physical conduct: touching, assault, impeding, or blocking movements.
- Retaliation for making reports or threatening to report sexual harassment.

Please note, the above list is indicative and has been included by way of example only.

### ***Internal Committee***

The Company has constituted an Internal Committee (“IC”) to investigate into allegations of sexual harassment. The Company reserves the right to add to, remove or replace the IC members from time to time.

### ***Complaint***

Any employee who alleges to have been subjected to any act of sexual harassment at the workplace may make a complaint to the IC. The aggrieved employee may request the IC to provide reasonable assistance for making the complaint in writing. In case the complainant is under any physical or mental incapacity, the complaint can be made by the legal heir or any other person authorized in writing by the complainant. The complaint should be made in writing or via email to the IC as soon as possible, not later than 3 months from the date of occurrence of the incident alleged to constitute sexual harassment (in case of a series of incidents, within a period of 3 months from the date of the last incident). The IC may extend the time limit not exceeding three months, if it is satisfied that there were unavoidable circumstances which prevented the aggrieved woman from filing a complaint within the said period.

Hard-copy complaints should be submitted to the HR Manager of Taboola India and email complaints should be sent to [ic-india@taboola.com](mailto:ic-india@taboola.com). All complaints, whether in hard-copy or email form, should be clear and should include details of the incident or incidents, supporting documents, names of individuals involved and the names and addresses of the witnesses.

Any manager or employee who becomes aware of an incident of sexual harassment should promptly report the same to the IC.

If the complainant would like to initiate action under the Indian Penal Code, 1860 (“**IPC**”), she may inform the IC of the same, and the Company shall provide necessary assistance to file such complaint.

### ***Conciliation***

Before the IC initiates an inquiry into the complaint, the complainant may request the IC to settle the matter between the complainant and the respondent through conciliation before initiating an inquiry. However, no monetary settlement shall be made the basis of the conciliation. In the event a settlement has been reached, further inquiry shall not be conducted.

### ***Inquiry***

All claims of sexual harassment will be promptly and thoroughly investigated by the IC in accordance with the principles of natural justice and the provisions applicable law. Neither the complainant nor the respondent shall be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the IC.

In the event that the complainant or respondent fail to appear before the IC without sufficient cause for three consecutive hearings, the IC shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complainant.

The IC shall submit an enquiry report to the Company’s authorized representative upon conclusion of the inquiry. The report of the IC shall be deemed to be the enquiry report for purposes of any disciplinary rules applicable to the employee against whom a complaint of sexual harassment was made. Where the IC determines that the allegation against the respondent has been proved, it may recommend to the Company to take action for sexual harassment as misconduct in accordance with the provisions of the Company’s applicable policies, up to and including termination of employment.

In the event the IC determines that the complaint is false or malicious, the IC may recommend to the Company to subject the complainant making the false complaint to disciplinary action, up to and including termination of employment. It is hereby clarified that mere inability to substantiate a complaint or provide adequate proof shall not attract action against the complainant.

### ***Confidentiality***

Complaints of sexual harassment shall be treated with sensitivity and confidentiality. Contents of the complaint, enquiry report the identity and addresses of the complainant, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the IC and the action taken by the Company shall be treated as confidential.

If any person entrusted with the duty to handle the complaint, inquiry or any recommendations

of the IC, contravenes his/her confidentiality obligation, he/she shall be liable to disciplinary action, in accordance with the provisions of the Company policies, as applicable.

### ***Information***

Please contact Oshrat Binyamin at [oshrat.b@taboola.com](mailto:oshrat.b@taboola.com) for any questions or further guidance in relation to this sexual harassment policy.

### **Employee Acknowledgement:**

I acknowledge that I have received and read the Company's Sexual and Other Unlawful Harassment Policy. I understand that Taboola has provided me with certain channels in which to raise any concerns of violations of this policy, and encourages me to do so promptly so that Taboola may effectively address such situations, and I understand that nothing herein interferes with any right to report concerns or make lawful disclosures regarding potential violations of this Sexual and Other Unlawful Harassment Policy. I agree that it is my responsibility to comply with the Sexual and Other Unlawful Harassment Policy and any revisions made to it, and any such revisions, deletions or additions to this policy shall be made in writing.