

# **India Employee Handbook Addendum**

Updated September 2025

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This Employee Handbook Addendum applies to Diligent Governance Private Limited (Formerly Rsam Technologies India Pvt. Ltd.) (the Company). It is an addendum to the Diligent Global Employee Handbook. The Global Employee Handbook and this Addendum will be collectively referred to as the Handbook.

## **1. POLICIES AND PROCEDURES**

### **a) Harassment**

Harassment of any kind is prohibited. Harassment is any form of unwelcome, unwanted or uninvited conduct or behavior, which humiliates, offends, threatens, embarrasses or intimidates a person (or is likely to have that effect), and a reasonable person, having regard to all of the circumstances, would have anticipated that the conduct or behavior would have such an effect or is otherwise provided for under applicable law.

Harassment is unlawful where it occurs because of a person's Protected Characteristics. In addition to being unlawful discrimination, such harassment may also breach legislation by creating an unsafe work environment and, in some cases, constitute criminal or civil offences.

Harassment may consist of acts, requests, spoken words, gestures or the production, display or circulation of written words, pictures or other material and which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person. Types of conduct and behavior that may constitute harassment, include, but are not limited to, the following:

- verbal harassment – jokes, comments, ridicule or songs;
- written harassment – including faxes, text messages, emails or notices;
- physical harassment – jostling, shoving or any form of assault;
- threatening behavior – aggressive gestures, hostile body language or physical intimidation.
- visual display or circulation of racist, pornographic or other offensive material (such as posters, emblems or badges) including in electronic format;
- bullying a person because of certain Protected Characteristics ; or
- isolating or excluding a person from work-related activities because of certain Protected Characteristics.

Sexual harassment includes any form of unwanted verbal, non-verbal or physical conduct of a sexual nature, which may consist of acts, requests, spoken words, gestures or the production, display or circulation of written words, pictures or other material, being conduct (whether directly or by implication) which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person.

Examples of this type of harassment include, but are not limited to, the following:

- sexual gestures and unsolicited requests for dates, sexual favors, a sexual

- relationship or declarations of love;
- displaying sexually suggestive objects, pictures, calendars, screen-savers etc.;
- sending suggestive and/or pornographic correspondence including faxes, text messages, instant messages or emails;
- sexually colored remarks, unwelcome sexual comments or jokes;
- physical contact or advances including but not limited to unwelcome physical conduct of a sexual nature such as pinching, unnecessary touching, etc.; or
- unwelcome pressure for social contact.

The Company strongly believes that every employee has the right to work with dignity and strongly condemns any form of harassment including sexual harassment.

Please refer to the Company's Prevention of Sexual Harassment Policy for further details. The policy applies to all employees at the workplace of the Company with the prime objective of preventing, prohibiting and redressing an incident of sexual harassment occurring at the workplace.

#### b) Workplace Bullying

Workplace bullying is repeated, unreasonable behavior directed by an employee or group of employees toward an employee or group of employees at work that may lead to physical or psychological harm, and, which creates a risk to health and safety.

Unreasonable behavior means behavior that a reasonable person having regard to the circumstances, may see as unreasonable. Conduct or behavior that may constitute bullying can be direct or indirect, verbal, physical or otherwise, and conducted by one or more persons against another or others, at the place of work and/or in the course of employment (whether during work hours or outside of work hours and whether away from the Company's premises). An isolated incident may not constitute bullying.

Bullying does not include reasonable management action carried out in a reasonable manner, such as a performance management process involving legitimate and constructive criticism of your performance or behavior.

Examples of conduct or behavior that may constitute bullying include, but are not limited to, the following:

- verbal abuse/personal insults and name calling;
- persistent unjustified criticism and sarcasm;
- public or private humiliation, or spreading malicious rumors;
- shouting at employees in private and/or public;
- sneering;
- instantaneous rage, often over trivial issues;
- unreasonable delegation of duties & responsibilities;
- setting impossible or unreasonable deadlines;
- unnecessary work interference;

- making it difficult for employees to have access to necessary information;
- isolation or exclusion from work-related activities;
- aggression;
- continuously refusing reasonable requests without good reasons; or
- intimidation and threats in general.

Bullying may also consist of persistent offensive, abusive, aggressive, intimidating, malicious or insulting behavior, or abuse of power carried out by an employee or group of employees, either directly or indirectly, which makes the recipient feel upset, threatened, humiliated or vulnerable.

## **2. WORK, PAY AND BENEFITS**

### **a) Shift Work**

Employees may be required to work shifts accordance with their contract of employment. All shift work must be in alignment with the Shift Work Guidelines that can be found on Launchpad.

### **b) Overtime Guidelines**

Employees must ensure they behave and act in accordance with the 'Overtime] Guidelines - India' that can be found on Launchpad.

### **c) Creche Facility**

Office-based employees can claim reimbursement for creche expenses incurred only at Little Millennium Bellandur Preschool and Daycare Facility located at Kariyammana Agrahara, Bellandur, Bengaluru, Karnataka 560103, India.

The creche reimbursement will only include the registration fees and daily fees of the creche. Any additional costs will be borne by the employee.

Employees are required to submit the reimbursement through Concur. Further information on the creche facility can be found on Launchpad.

### **d) Guidelines for Employment of Relatives**

#### **Disclosure**

Be transparent with colleagues and manager or management about the relationship to avoid any perception of favoritism or conflicts of interest. Failure to disclose to HR could result in disciplinary action.

#### **Confidentiality**

Respect the company's confidentiality policies and avoid discussing sensitive information about work with each other outside of appropriate channels.

#### **Avoiding Personal Communication**

Keep personal interactions, including physical affection, to a minimum in the workplace

to maintain a professional environment.

### **Seeking Support**

If necessary, seek guidance from HR or your Manager on how to navigate any challenges or conflicts that may arise from working together as spouses or family member.

### **Avoid Taking Unplanned Leaves Together**

To help maintain smooth team operations, employees who are spouses or family members are encouraged to communicate with their managers and each other when planning leave, especially unplanned absences. While it is understood that occasional simultaneous leave may be unavoidable, where possible, coordinating leave can help minimize impact on project deadlines and team productivity. This is especially important if you work closely within the same team or on shared projects.

## **3. HEALTH AND SAFETY**

The APAC Health and Safety Committee reviews health and safety processes, provides employees with an avenue to report and log any health and safety risks or incidents, and ensures our health and safety policy and processes are effective. Employees must carry out any requirements or instructions sent by the APAC Health and Safety Committee, including the following:

1. Safe Work Survey - All employees will be sent a Safe Work Survey every 6 months. Employees must complete this set of questions relating to your working from home environment and the practices that they are following day to day when working from home.
2. Incident Report Log - The APAC Health and Safety Committee's Incident Report Log is located on the APAC Health and Safety Launchpad page. Employees must complete this log if they experience or witness any Health and Safety Incidents in the office or want to raise any Health and Safety concerns with the Committee.

## **4. TRANSPORTATION POLICY**

### **Purpose**

Diligent is committed to the safety and welfare of its employees. As such, the Company will, as far as is reasonably possible, provide pickup and drop off services for employees in scope using shared vehicles for commuting to and from Diligent's office. This document provides the policy and guidelines for providing and availing of company transport.

### **Scope**

The transport service is available to all regular, full-time employees of Diligent Governance Private Limited (Formerly Rsam Technologies India Pvt. Ltd.) (the Company). The transport service is available for regular full-time employees to avail of during log-in and logout times on days they work from Diligent's office, for transport to and from the employee's residence and Diligent's office.

It is the responsibility of eligible employees to register for the service, to use the transport

services responsibly and to ensure that the services are used only for purposes as outlined in this document. Any cases of misuse are subject to disciplinary action.

### **General Guidelines**

- Transport vehicles will report to the colony gate and employees are expected to report to the location they have provided during the registration process in order to avail of the transportation services. Employees are required to board and alight the shared vehicle from the designated location.
- During dark hours (8 pm to 6 am IST) the drop off point will be at the employee's doorstep regardless of whether it's a gated colony or not.
- For general shift employees, pickup and drop off from nodal points will be up to 2kms from the employee's residence in the event that there is no proper road access. For shift employees, an escort will accompany the employee to the colony gate/ society, if the colony/society permits.
- The maximum number of people to be planned in one vehicle is as follows (excluding driver):
  - Sedan: 3 per vehicle
  - Sport Utility Vehicle (SUV): 5 per vehicle
  - Tempo Traveller (TT): 11 per vehicle
- The vehicle will reach the first pickup point 15 minutes before the scheduled departure time. Employees are required to board the vehicle at their scheduled time.
- For subsequent pick-up points, if the employee is not at the pick-up point at the scheduled time, the vehicle will wait for 5 minutes. After 5 minutes the vehicle will move to the next pick-up point. Employees can check the location and status of their pickup vehicle on the transport management system (TMS) and are advised to plan accordingly.
- Employees must report on time for boarding the transport vehicle for the return journey to their residence. Transport vehicles can wait for a maximum of 10 minutes; any further delay will not be tolerated.
- Trip Sheets: It is mandatory for all employees to share the one-time password (OTP) while boarding and alighting the transport vehicles.
- If an employee is going to be delayed taking the transport vehicle from the office to their residence, they must inform the Transport Helpdesk with at least one hour's notice. The employee must submit an ad-hoc request for a delayed transport vehicle. If a vehicle is readily available, the Transport Helpdesk will assign the transport vehicle accordingly. If a transport vehicle is not available, a minimum of 2 hours is required to arrange one.
- Employees who wish to leave early on their own, on account of personal reasons, must send an email to [blrtransportationdesk@diligent.com](mailto:blrtransportationdesk@diligent.com) copying their immediate supervisor and available floor manager citing the reason for their early departure. Office transportation will not be provided if an employee chooses to leave before their shift ends. Details of floor manager names are displayed in Notice Board and in the front office.
- Employees who need to leave early due to an emergency or illness should promptly contact the Transport Help Desk and their floor manager. Office transportation will be arranged

immediately for those who choose to use it. If an employee opts out of office transportation, either the employee or the floor manager (on employee's behalf) should send an email to [blrtransportationdesk@diligent.com](mailto:blrtransportationdesk@diligent.com), copying the employee's immediate manager.

- In situations where an employee feels unwell, the transport team can arrange office transportation directly from the office to the employee's location per the details shared in TMS tool. However, in case of an emergency, the escort on duty should inform the Transport Help Desk to take the team member to the nearby hospital.
- To ensure safety of the employees, the transport vehicles will not stop anywhere other than the designated pick-up or drop-off points.
- Transport services cannot be used for ridership by families of employees.
- The Company is not responsible for any lost or damaged personal belongings of employees while they are travelling in Company provided transport vehicles. Employees are advised to be careful with their personal belongings while availing of the transport vehicle facility.
- In order to ensure optimum utilization of transport vehicles and to ensure greater efficiencies, the TMS will, wherever possible, group common route commuters during pickups and drop-offs.
- In case of any delays in pickup and/or drop off, the transport team will inform the commuters and advise further course of action. Alternatively, commuters can contact the transport coordinator in instances when the vehicle does not report on time for a scheduled pick up and/or drop off. If there is a delay of more than 30 minutes from the scheduled pick-up time, team members have the option to cancel the cab request and work remotely for that day.
- The transport service cannot be utilized for airport pickup/drop off, ad-hoc travel or spot rentals.
- Please note that transportation will not be arranged for employees in the following cases:
  - To commute one way - either to the office or from the office.
  - To participate in late evening team events (Lunch / Outing / Team dinner).
- General Shift employees are eligible for pick-up and drop off within 25km radius of the office.
- Shift employees have no distance eligibility criteria provided they are within the Bengaluru jurisdiction.

## **Registration**

- Eligible employees can register for the transport facility by sending an email request to <mailto:blrtransportationdesk@diligent.com> who will then provide a link to complete the registration process.
- New hires should allow one week's time for the transport team to make transport arrangements.
- All eligible employees are entitled to book their transport vehicles according to their working hours/days schedule, with advance booking available up to 30 days in advance.



- Eligible employees should ensure to cancel their trips/routes in case of any changes, such as planned leaves, sick leaves, emergency leaves, or vacations. User should cancel the transport vehicle booking at least 8 hours in advance by using TMS tool, or else it will be considered as NO SHOW.
- Any changes in the existing users address needs to be communicated to transport team.

### **Cut-off timings**

All transport service scheduling or cancellation requests must be submitted via the TMS tool before 04:00pm for the next day.

If a team member forgets to book the transport vehicle for the next day, they must send a WhatsApp message to the Transportation Helpdesk at **+91-99013 18777** stating that they require a pickup and drop off transport vehicle for the next day (Cut off time: on or before 6 pm prior day).

### **Cancellation**

- Employees can use the TMS tool to permanently cancel transportation service and manage cancellations effectively.

### **No-shows**

- Transport vehicle trips will automatically cancel after 5 minutes (max) of a NO-SHOW.
- In case any registered user is consistently having no shows (at least 2 rides per month), then an intimation email copying the immediate reporting manager / HR will be sent to the user.

### **Safety and Security**

- Dark hours are 8:00 pm IST to 06:00 am IST.
- The Security team is deployed to take care of the security needs, particularly of female employees and transport operations.
- All female employees will be provided a male security escort during dark hours for first pickup or last drop off.
- All vehicles are GPS enabled.
- All vehicles are enabled with Boarding OTPs and deboarding OTPs.
- The command centre team monitors Diligent vehicles during dark hours.
- Soft panic buttons are available on the employee application on all TMS tools.
- SMS based ETA & Vehicle information is available via the TMS tool.
- Appropriate measures are put in place to ensure that drivers are NOT intoxicated. If an instance is reported or comes to our notice that a driver is intoxicated, then an investigation will be conducted with Vendor / Driver and appropriate action will be taken.

### **Role of Security Escorts**

- Be in constant contact with Front Desk / Transportation.
- Ensure the female employee reaches home/office safely & waits at the gate of her residence till she enters the gate/ society and send the confirmation offboarding OTP.

- No diversion or unauthorized stoppage on any routes.
- Record incidences of any route deviations and inform the transport team immediately.
- Complete the escort form with details such as employee name and drop-off location in the TMS.

### **Incident Management**

- In the event of any untoward incident during the trip, employees should contact the transport helpdesk (+91- 99013 18777) immediately, which is available 24/5.
- The transport team will respond based on the severity of the incident occurred and arrange for an alternate vehicle and provide medical assistance, if required.
- In case of an emergency, kindly press the soft panic button in mobile application and hard panic button in transport vehicle. The transport/facilities team will receive an alert and call you immediately to determine the nature of the emergency.
- Transport team will file an incident report post performing Root Cause Analysis to the HR team.
- Employees should not misuse the panic button. Repeated false alarms raised by an employee will result in escalation to the reporting manager.

### **Contact Details and Escalation Matrix**

- Transport team will be reachable 24/5.
- Emergency point of contact details will be displayed in each of the transport vehicles behind driver seat.
- Eligible employees can get the Transport Helpdesk contact details through the TMS tool.

### **Feedback and Complaint Process**

- Complaint/feedback can be raised by an employee at any time through the TMS tool.
- The transport team will monitor any complaint logged through the portal.
- Response to the complaint will be provided within 24hours of logging the complaint.

### **Employee Do's and Don'ts**

#### **Employee Do's**

- Ensure punctuality in reaching the pickup points as per the defined schedule.
- Be cordial with the driver and transport team for seamless operations.
- Log in through OTP and log out through OTP in the TMS application while boarding and alighting the vehicle.
- Always wear seat belts while travelling in the vehicle.
- Follow the safety instructions given by the escort

#### **Employee Don'ts**

- Do not misuse the transport facility provided by the company.
- Do not request the driver to stop the vehicle at unauthorized locations.

- Do not indulge in any activity which compromises the safety and security of fellow passengers.
- Do not engage in any verbal or physical altercation with the driver or co-passengers.
- Do not interfere in the route planning or schedule adherence.
- Any deviation will be treated as violation of company rules.

## Contact and Escalation Matrix

Name	Vendor	Designation	Phone #	Email ID
Pavan Gowda	Vendor	Transport Supervisor	+91 7760761782	operation.diligent@srtoursandtravels.co.in
Kumaresh B	Vendor	Operation Manager	+91 9148207775	kumaresh@srtoursandtravels.co.in
Raman N	Diligent	Security Officer	+91 9901318777	blrtransportationdesk@diligent.com
Saravanan V	Diligent	Office Manager	+91 9742061903	svijayaraghavan@diligent.com
Brinda Sreedharan	Diligent	Senior Manager	+91 988050039	bsreedharan@diligent.com
Jayakumar G S	Diligent	Senior Manager	+91 9886655623	jsubramanian@diligent.com
Shivani Singh	Diligent	HRBP	N/A	Ssingh@diligent.com
Niranjan J	Diligent	Manager	+91 8105849758	njagadeesh@diligent.com
Shreyas Shankar	Diligent	Team Lead	+91 6366823142	sshankar@diligent.com
Manmohan Mishra	Diligent	Team Lead	+91 8951728308	mamishra@diligent.com

**DISCLAIMER:** Above contact details are "DILIGENT CONFIDENTIAL" and are not to be shared externally.

## 5. LEAVE POLICIES

### a) Earned Leave

#### Accrual

The Earned Leave is calculated at the rate of 1 (one) day's paid leave for every 20 (twenty) days an employee has been in employment ("**Earned Leave**").

As may be applicable/ required from time to time under applicable law:

- full-time employees are eligible to receive up to 18 (eighteen) days of Earned Leave for each full year of employment (inclusive of the statutory entitlement to earned leave in accordance with applicable legislation). Such Earned Leave is earned by an employee progressively during a year of service;
- part-time employees are eligible to receive the pro-rated equivalent of 18 (eighteen) days' Earned Leave, which shall be earned at a rate according to their

ordinary hours of work (inclusive of the statutory entitlement to earned leave in accordance with applicable legislation); and

- iii. in the first year of employment, the employee will earn the Earned Leave for the period from their first day of employment through the last day of the year on a pro-rated basis, which shall be earned at a rate in accordance with their ordinary hours of work.

An employee cannot have a negative Earned Leave balance. A maximum of 45 (forty-five) days (as Earned Leave) may be carried forward to the next year except where the employee has requested for Earned Leave and the request has been rejected. In the event that an Earned Leave request has been rejected, that amount of Earned Leave can be carried over in addition to the 45 (forty-five) days. HR will be notified in instances where an Earned Leave request has been rejected. Any earned but unused Earned Leave (up to 45 (forty-five) days, except where the Earned Leave request was rejected) will be payable on termination of employment.

#### Requesting Earned Leave

Earned Leave requests should be submitted through Oracle as early as possible and in all circumstances all requests require approval by the direct manager, as assigned in Oracle.

### **b) Sick Leave (Casual Leave)**

#### Accrual

As may be applicable/ required from time to time under applicable law:

- (i) full-time employees are eligible to receive 12 (twelve) days of sick and casual leave in accordance with applicable legislation, front loaded during a calendar year ("**Sick Leave**"); and
- (ii) part-time employees are eligible to receive the pro-rated equivalent of 12 (twelve) days' Sick Leave per year, based on their ordinary hours of work.

An employee cannot have a negative Sick Leave balance. If needed, other leave types may be used to cover the desired time off, if appropriate.

Unused Sick Leave will not be carried over year to year. Available but unused Sick Leave will not be paid out upon termination of employment. However, if an employee entitled to any Sick Leave is discharged or dismissed from service when they are sick or suffering from the result of an accident, the Company would pay to them the amount payable in respect of the period of the leave to which he/ she was entitled at the time of their discharge or dismissal, in addition to the amount, if any, payable to them for Earned Leave.

### Requesting Sick Leave

An employee must give notice to their manager that they are taking Sick Leave as soon as practicable and must advise the period that they will be (or expect to be) on Sick Leave for. Sick Leave should be entered into Oracle by noon on the day of illness.

A doctor's note may be required for Sick Leave to be approved greater than three days in length. For patterns of absences, the Company may request a doctor's note for single day absences.

### **c) Compassionate Leave (Bereavement)**

Diligent will provide an employee with 5 (five) paid days of leave in the event of death of an immediate family member, and 3 (three) days of paid leave for other family members, as defined below. Should you require more time off due to circumstances (i.e. such as travel out of country), please contact your manager and HR for approval. An immediate family member is defined as:

- Spouse;
- Child;
- Stepchild;
- Grandchild;
- Parent/ in-laws;
- Step-parent;
- Guardian; or
- Sibling.

Other family members are defined as:

- Grandparent;
- Any person who lives with an employee as a member of the employee's family;
- Aunt/ Uncle; or
- Cousin.

### **d) Leave without Pay**

Leave without pay is not accrued. It can only be approved in special cases and after all other leave balances are exhausted.

Requests need to be submitted and approved by managers. Leave requests can be denied or withdrawn after approval.

### **e) Parental Leave**

Parental leave will apply in accordance with the Maternity Benefit (Amendment) Act 2017 and the Diligent Corporation Parental Leave policy. The Diligent Corporation

Parental Leave policy is inclusive of any Government-funded benefit to which an employee may be eligible to receive.

Parental leave needs to be requested via the Parental Leave request form in accordance with the timeframes required under applicable legislation. The Parental Leave request form will be sent to the employee upon contacting the HR team. Once completed and signed, the form must be submitted for approval to line manager and forwarded to HR.

Other benefits as may be applicable/ provided for from time to time under applicable law shall also be available. Employees who are contributors to Employees' State Insurance (ESI) shall be directly covered under the ESI Act, 1948.

#### **f) Statutory Holidays**

All employees are entitled to be absent from work on the prescribed public holidays in the state in which you are primarily based.

An employee shall be paid during their absence from work on a public holiday.

## **6. PREVENTION OF SEXUAL HARASSMENT POLICY**

### **1. Policy Scope**

- 1.1. Notwithstanding anything to the contrary contained in this Handbook, this policy, and any supporting procedures, applies to employees employed by the Company in India only.
- 1.2. This policy applies to all individuals working for the Company at all levels, including partners, employees (whether permanent or temporary, engaged directly or indirectly through an agent or contractor), apprentices, probationers, part-time and fixed-term employees (collectively known as employees in this policy) regardless of length of service and job applicants. Part-time and fixed-term employees should be treated the same as comparable full-time or permanent employees and enjoy no less favorable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified in a particular case in accordance with the Company's policies and applicable law.
- 1.3. This policy also applies to agency workers, consultants, self-employed contractors and self-employed subcontractors. If the individual who contravenes this policy is not directly employed by the Company, for example, if the worker's contract is with an agency, this policy will apply with any necessary modifications such as that the Company could not dismiss the worker but would instead require the agency to remove the worker, if appropriate, after investigation and disciplinary proceedings. Where the Company receives complaints from temporary employees/workers about the treatment they receive from their employer or agency, the Company will investigate and deal with the matter in accordance with the Company's policies.

- 1.4. The Company may also vary this policy, as appropriate in accordance with applicable law from time to time.
- 1.5. This Policy is also designed to comply with the POSH Act and to promote best practices.

## **2. Anti-Discrimination and Harassment including Sexual Harassment**

- 2.1 The Company is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including sexual harassment. Therefore, the Company expects that all relationships among people in the office will be business-like and free of bias, prejudice and harassment.
- 2.2 The Company encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of the Company to promptly and thoroughly investigate such reports. The Company prohibits retaliation against any individual who reports discrimination or harassment or who participates in an investigation of such reports.

**Sexual Harassment.** For the purposes of this policy, sexual harassment includes any form of unwanted verbal, non-verbal or physical conduct of a sexual nature, which may consist of acts, requests, spoken words, gestures or the production, display or circulation of written words, pictures or other material, being conduct (whether directly or by implication) which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person.

## **3. Examples of Sexual Harassment**

- 3.1 The following describes some of the types of acts that may amount to sexual harassment and are strictly prohibited:
  - Physical contact and advances.
  - Demand or request for sexual favors.
  - Making sexually colored remarks.
  - Showing pornography.
  - Making sexually suggestive remarks or innuendos.
  - Serious or repeated offensive remarks, such as teasing related to a person's body or appearance.
  - Offensive comments or jokes.
  - Inappropriate questions, suggestions or remarks about a person's sex life.
  - Displaying sexist or other offensive pictures, posters, multimedia messaging service, short message service, WhatsApp, messages through any other messaging applications, or e-mails.
  - Intimidation, threats, blackmail around sexual favors.



- Threats, intimidation or retaliation against an employee who speaks up about unwelcome behavior with sexual overtones.
- Unwelcome social invitations, with sexual overtones commonly understood as flirting.
- Unwelcome sexual advances which may or may not be accompanied by promises or threats, explicit or implicit.
- Physical contact such as touching or pinching.
- Caressing or fondling someone against his/her will (could be considered assault).
- Invasion of personal space (getting too close for no reason, brushing against or cornering someone).
- Persistently asking someone out, despite being turned down.
- Stalking an individual.
- Abuse of authority or power to threaten a person's job or undermine that person's performance against sexual favors.
- Falsely accusing and undermining a person behind closed doors for sexual favors.
- Controlling a person's reputation by rumormongering about his/her private life.
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

3.2 The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

- implied or explicit promise of preferential treatment in his/her employment; or
- implied or explicit threat of detrimental treatment in his/her employment; or
- implied or explicit threat about his/her present or future employment status; or
- interference with his/her work or creating an intimidating or offensive or hostile work environment for him/her; or
- humiliating treatment is likely to affect his/her health or safety.

Some examples of behavior that may indicate underlying workplace sexual harassment and merit investigation:

- Criticizing, insulting, blaming, reprimanding or condemning an employee in public.
- Exclusion from group activities or assignments without a valid reason.
- Statements damaging a person's reputation or career.
- Removing areas of responsibility, unjustifiably.
- Inappropriately giving too little or too much work.
- Constantly overruling authority without just cause.
- Unjustifiably monitoring everything that is done.
- Blaming an individual constantly for errors without just cause.
- Repeatedly singling out an employee by assigning herewith demeaning and belittling jobs that are not part of that person's regular duties.
- Insults or humiliations, repeated attempts to exclude or isolate a person.
- Systematically interfering with normal work conditions, sabotaging places or instruments of work.
- Humiliating a person in front of colleagues, engaging in smear campaigns.
- Arbitrarily taking disciplinary action against an employee.

- Controlling the person by withholding resources (time, budget, autonomy, and training) necessary to succeed.

### 3.3 Some examples of workplace behavior that may not constitute sexual harassment:

- Following up on work absences.
- Requiring performance to job standards and managing poor performance in accordance with Company policy.
- The normal exercise of management rights.
- Work-related stress, for e.g. meeting deadlines or quality standards.
- Conditions of work.
- Constructive feedback about a work mistake or error, where that feedback is not inappropriately personal.

## 4. Retaliation

4.1 Unlawful retaliation can be any adverse action or victimization that could discourage an aggrieved individual from coming forward to make or support a sexual harassment claim. Adverse action need not be job-related or occur in the workplace to constitute unlawful retaliation (e.g. threats of physical violence outside of work hours). However, the retaliation provision is not intended to protect people making intentionally false charges of harassment. The Company will not tolerate retaliation against any individual who has either made a complaint or participated in an investigation of a complaint under this policy.

## 5. Who can be a target of sexual harassment?

5.1 This policy covers men, women and transgender persons (as may be defined under applicable law from time to time), including same-sex harassment.

Sexual harassment can occur between any individuals, regardless of their sex or gender. Harassers and aggrieved people can be a superior, a subordinate, a co-worker or anyone in the workplace including an independent contractor, contract worker, vendor, client, customer or visitor.

## 6. Where can Sexual Harassment occur?

6.1 Sexual harassment is not limited to the physical workplace itself. It can occur while employees are travelling for business, or at a Company sponsored event or party. Calls, texts, emails, and social media usage by employees can constitute unlawful workplace harassment, even if they occur away from the workplace premises, on personal devices or during non-work hours.

## 7. Reporting Sexual Harassment

7.1 The Company has constituted an internal complaints committee (**ICC**) to deal with any

complaints of sexual harassment and take appropriate measures.

- 7.2 The ICC consist of a presiding officer (i.e. a woman employed at a senior level at workplace from amongst the employees), at least 2 (two) members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge and 1 (one) external member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment, including in compliance with the POSH Act. Also, at least one-half of the total members are women.
- 7.3 Preventing sexual harassment is everyone's responsibility. Any employee paid or unpaid intern, apprentice, or independent contractor who has been subjected to behavior that may constitute sexual harassment is encouraged to report such behavior to the ICC. Anyone who witnesses or becomes aware of potential instances of sexual harassment should report such behavior to the ICC.
- 7.4 Reports of sexual harassment are to be made in writing. A form for submission of a written complaint is attached to this policy (see **Schedule A**) and is also subject to the requirements under Clause 9.2 of this policy. All employees are encouraged to use this complaint form. Employees who are reporting sexual harassment on behalf of other employees should use the complaint form and note that it is on another employee's behalf.
- 7.5 Employees, paid or unpaid interns, apprentice, or independent contractors who believe they have been a target of sexual harassment by an employee of the Company, may also seek assistance in other available forums, as explained below in the section on Protections and Remedies.

## **8. Managerial Responsibilities**

- 8.1 All managers who receive a complaint or information about suspected sexual harassment, observe what may be sexually harassing behavior or for any reason suspect that sexual harassment is occurring, are required to report such suspected sexual harassment to the ICC.

Leaders and managers will be subject to disciplinary action for failing to report suspected sexual harassment or otherwise knowingly allowing sexual harassment to continue. Managers will also be subject to disciplinary action for engaging in any retaliation.

## **9. Complaint and Investigation of Sexual Harassment**

- 9.1 All complaints or information about suspected sexual harassment are to be made in writing. Investigations will be conducted in a timely manner and shall be confidential.

- 9.2 The complaint shall have to be in writing and can also be in the form of a letter or in the format provided under Schedule A submitted within 3 (three) months from the date of the incident and in case of a series of incidents, within a period of 3 (three) months from the date of the last incident. The complainant shall submit to the ICC 6 (six) copies of the complaint along with supporting documents and the names and addresses of the witnesses.
- 9.3 Further, if the ICC is satisfied that the circumstances were such which prevented the person from filing a complaint within the said period, it can extend the time limit for submission of the complaint (not exceeding 3 (three) months), however the reason for such extension would need to be recorded in writing.
- 9.4 While conducting the proceeding, it is mandatory for the ICC to follow principles of natural justice and give fair opportunity to the respondent to defend himself/herself. The Company will accordingly serve a copy of the complaint within 7 (seven) working days of receipt of the complaint.
- 9.5 The respondent may file a reply to the complaint within 10 (ten) working days of receipt thereof along with the respondent's list of documents and names and addresses of witnesses.
- 9.6 Thereafter, the complainant as well as the respondent will be given an opportunity to lead evidence, both documentary as well as through witnesses, and also to cross examine the witnesses presented by the other party.
- 9.7 At any given time during the conduct of the enquiry, a minimum of 3 (three) members of the ICC must be present, which must include the presiding officer or chairperson.
- 9.8 During the pendency of the inquiry, on a written request by the complainant, the ICC may recommend to the Company to:
- a) transfer the complainant or the respondent to any other workplace;
  - b) grant leave to the complainant up to a period of 3 (three) months; or
  - c) restrain the respondent from reporting on the work performance of the complainant or writing his/her confidential report and assign the same to another officer.
- 9.9 An investigation of any complaint, information or knowledge of suspected sexual harassment will be prompt and thorough, commenced immediately and completed as soon as possible. The investigation shall be kept confidential to the extent possible. All people involved, including complainants, witnesses and alleged harassers, will be accorded due process, as outlined below, to protect their rights to a fair and impartial investigation.
- 9.10 Any employee may be required to cooperate as needed in an investigation of suspected sexual harassment. The Company will not tolerate retaliation against

employees who file complaints, support another's complaint or participate in an investigation regarding a violation of this policy.

9.11 While the process may vary from case to case, investigations should be done in accordance with the following steps:

- a) Upon receipt of complaint, the ICC will conduct an immediate review of the allegations and take any interim actions (e.g. instructing the respondent to refrain from communications with the complainant) as appropriate. In case an aggrieved employee is unable to submit a written complaint, the ICC will provide such employee with all necessary assistance to make the complaint in written form.
- b) During the investigation/enquiry, the ICC shall:
  - Take steps to obtain and preserve documents, emails, or phone records relevant to the investigation.
  - Request and review all relevant documents, including all electronic communications.
  - Interview all parties involved, including any relevant witnesses.
  - Collect and create a written documentation report of the investigation (such as a letter, memo or email) which contains the following:
    - a list of all documents reviewed, along with a detailed summary of relevant documents.
    - a list of names of those interviewed, along with a detailed summary of their statements.
    - a timeline of events.
    - a summary of prior relevant incidents, reported or unreported; and
    - the basis for the decision and final resolution of the complaint, together with any corrective action(s).
  - Keep the written documentation and associated documents in a secure and confidential location.
  - Complete the enquiry within a period of 90 (ninety) days.
  - Prepare a report of its findings for the Company within a period of 10 (ten) days from the conclusion of the enquiry and such a report shall be made available to the concerned parties. Based on its findings, the ICC can recommend a written apology, censure, withholding promotion, withholding increments, counselling, community service or termination of the respondent from service.
  - Where the allegations against the respondent have been proved, the ICC may also deduct, such sum as it considers appropriate, to be paid to the complainant from the salary or wages of the respondent, with regards to the mental trauma caused to the complainant, loss in career opportunity due to the incident of sexual harassment, medical expenses incurred by the victim for physical or psychiatric treatment, the income and financial status of the

respondent, the feasibility of such payment in lump sum or in instalments. In case the Company is unable to make such deduction from the salary of the respondent due to his being absent from duty or cessation of employment, it may direct the respondent to pay such sum to the complainant.

- Promptly notify the individual who reported and the individual(s) about whom the complaint was made of the final determination and implement any corrective actions identified in the written document.
- Inform the individual who reported of his or her right to file a complaint or charge externally as outlined in the next section.

## **10. Protections and Remedies**

10.1 An aggrieved individual can file a complaint of sexual harassment before the ICC.

10.2 An aggrieved individual includes an individual working or visiting any workplace whether in the capacity of regular, temporary, ad hoc, or daily wages basis engaged directly or through an agent, including a contractor. They may be working for remuneration, on a voluntary basis or otherwise.

## **11. Individuals and Conduct Covered**

11.1 This policy applies to all employees, apprentices and interns of the Company.

11.2 This policy should not, and may not, be used as a basis for excluding or separating individuals of a particular sex or gender, or any other protected characteristic, from participating in business or work-related social activities or discussions in order to avoid allegations of harassment. The law and the policies of the Company prohibit disparate treatment on the basis of sex or any other protected characteristic, with regard to terms, conditions, privileges and perquisites of employment. The prohibitions against harassment, discrimination and retaliation are intended to complement and further these policies, not to form the basis of an exception to them.

11.3 In addition, employees who are managers or have supervisory responsibility may not have a romantic, dating, sexual or other intimate relationship with any employee to whom they assign work, directly supervise, or whose employment or compensation decisions they influence, without both parties promptly advising the HR Department of such a relationship, so that appropriate assurances/arrangements can be made to assure mutual consent and no adverse impact or favoritism in the workplace. Furthermore, employees should understand that there may be situations where it is determined that no such appropriate arrangements can be made and, therefore, employment decisions may need to be made if the relationship in question is to continue. Should a conflict arise, at the discretion of the Company, individuals will be given the opportunity to decide who is to be transferred to another available position. If no decision can be reached by the individuals

themselves within the timeframe set by the Company, management will decide who is to be transferred or, if necessary, terminated from employment.

## **12. Data Protection**

The Company processes personal data collected in relation to this policy in compliance with applicable law. Data collected is held securely and accessed by, and disclosed to, individuals only for the purposes intended. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported immediately. It may also constitute a disciplinary offence, which will be dealt with under the Disciplinary Policy.

## **13. Who To Contact**

Any questions regarding this policy or the associated procedures should be directed to [HRBP@diligent.com](mailto:HRBP@diligent.com).

## **14. Policy Effective Date**

This policy is effective from July 2022 and has been last updated as of September 2025.

## Schedule A: Complaint Form for Reporting Sexual Harassment

Complainant Information	
Complainant Name:	
Job Title:	
Work Address:	
Work Phone:	
Select Preferred Communication Method:	<input type="checkbox"/> Email <input type="checkbox"/> Phone <input type="checkbox"/> In-Person
Manager Information	
Immediate Manager's Name:	
Manager's Title:	
Work Address:	
Work Phone:	
Complaint Information	
1. Your complaint of Sexual Harassment is made about:	
Name:	
Job Title:	
Work Address:	
Work Phone:	
Relationship to you:	<input type="checkbox"/> Manager <input type="checkbox"/> Co-Worker <input type="checkbox"/> Subordinate <input type="checkbox"/> Other
2. Please describe what happened and how it is affecting you and your work. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.	
3. Date(s) sexual harassment occurred:	
Is the sexual harassment continuing?	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. Please list the name and contact information of any witnesses or individuals who may have information related to your complaint:	
The questions below are optional but may help the investigation.	



5. Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?	
If you have retained legal counsel and would like us to work with them, please provide their contact information.	
<b>Complainant Signature</b>	
Signature:	
Date:	

**Send completed form to** [poshicc-india1@diligent.com](mailto:poshicc-india1@diligent.com)

*Souvik Hazra.*

11 / 05 / 2025

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