At Zoho, we encourage employees to participate in online communities, blogs, and other social networking platforms as these provide a rich experience of learning, assimilating information, and developing new ideas. However, we believe that the ethics, confidentiality and values of the company

must be respected, while we involve ourselves in any form of communication with an external party or individual(s).

There are some guidelines to remember and observe while participating on ANY online platform:

A. Creation of profiles (or pages)

- 1. You are encouraged to create personal accounts on social media platforms and communities. However, you should avoid using your @zohocorp.com email address for the same.
- 2. While creating personal accounts, you may mention your job/role at Zoho. If you do mention that you work for Zoho, you must use your real full name. However, ensure that your username on any online platform does not include the brand name "Zoho".
- 3. In case you have chosen not to reveal your real name on a social network, please do not associate

yourself with Zoho in any form.

- 4. Do not create profiles or pages on any social network, impersonating a Zoho employee.
- 5. Do not create an online profile (or page) that represents the Zoho brand, team, or any Zoho product.

B. Listening and Learning

- You are encouraged to listen to online conversations and discussions about the Zoho brand, products, teams and events. It is also great to follow industry leaders on social media channels/platforms.
- 2. In case you come across an online conversation, discussion or post that you feel requires a response

or action on behalf of Zoho, you may email it to the central social media team (socialmedia@zohocorp.com).

3. In case you are the owner for a product related feedback reported in an online forum, you may take

appropriate steps to address the feedback. However, you must communicate our response about such

feedback only via a communication channel owned by Zoho.

(See section D 2 and D 3)

C. Sharing Content

- 1. You are free to share any piece of content (from/on your personal social profiles) that has been published on official Zoho sites and social media channels/platforms (like Facebook, Twitter, and blog).
- 2. With respect to third-party content (published by someone outside of Zoho) related to Zoho brand.

products, teams and events, you may share such content. However, we do expect you to use your own

judgment in deciding how a particular piece of content reflects on Zoho's brand image and whether you should be sharing it.

3. Do not create an online profile that shares only Zoho related news and content. It neither adds any

value to Zoho as a brand, nor to you as an individual, nor to the social network in general. Avoid maintaining such Zoho-talk-only accounts.

4. Please remember that any kind of information available on our internal networks: Connect, Forums,

Internal Blogs, etc. is not meant to be shared on external networks, social networking sites or to individual(s) outside of Zoho. This includes announcements from the CEO, HR and Admin. It also includes announcements regarding upcoming products, features, etc. Do not share any such content,

unless you are explicitly asked to share a piece of relevant information with your friends, for e.g. job openings. If there is a news item that needs to be announced, the team handling PR shall speak to the

press and media contacts. Please note that any violation with respect to sharing of internal communication outside of Zoho, during or after employment, is liable for prosecution.

5. No media (images and videos) recorded during internal events or team activities should be shared

without approval from the social media team at Zoho.

D. Communicating with stakeholders

- 1. If you wish to communicate with a stakeholder (a customer, prospect, partner, etc.) you should preferably channelize such official communication through a Zoho-owned channel.
- 2. All official communication and interaction on Facebook, Twitter and Instagram, (including communication with stakeholders as well as official announcements) is managed by the central social

media team. You are requested to refrain from commenting on behalf of Zoho, on such channels. (Also see: section B2 and B3)

3. However, if you wish to communicate with a stakeholder (a customer, prospect, partner, etc.) on a

professional network like LinkedIn, please ensure that you exercise restraint and common sense in all

such communication.

- 4. If you are disclosing your identity as a Zoho employee, your opinions might be directly associated with Zoho by other observers/participants on these platforms. (Also see: section A2.) Hence, it is critical to exercise caution.
- 5. While making such communications and connections with Zoho's stakeholders or anyone who mentions/tags Zoho, remember that it should be about exchanging value and not about pushing your

own agenda or thrusting your own opinion.

E. Responsibility and Ownership

1. As far as your online presence is concerned, understand that there is only a thin line separating your

personal identity and professional identity. While you have complete freedom and right to publish any

content on your personal social profiles in your personal capacity, understand that the reputation of Zoho is associated with you and the content that you publish, as you may be identified as an employee

of Zoho. Therefore, remember to always use good judgment and common sense in deciding what you

publish. Please remember that the internet never forgets and hence, you must always check before you publish. In case you're unsure if a message or a piece of content is appropriate, please seek advice

from any of the contacts mentioned below. Ultimately, you own the responsibility for the content you

publish on the web.

- 2. Remember to maintain a respectful and polite tone in your conversations. Do not make personal attacks or offensive comments against individuals. Stay humble.
- 3. If you realize that you have made a mistake, be the first one to accept it. If you are making an amendment in an article you wrote on the Zoho blog, let the readers know that you have made the change.
- 4. Do not mention or quote a stakeholder (customer, partner, and colleague) without his or her prior approval. Remember, everyone may not feel comfortable about being quoted. Get their consent.
- 5. While you may take photographs/record videos within the Zoho Office premises, always use your sense of judgement, prudence and common sense before sharing such photographs or videos on social

media platforms. If the photographs/videos include individuals other than the intended participants (such as current or former employees, customers, vendors, etc), ensure that you have obtained the concerned individuals' permission before sharing such photographs/videos. Examine the photographs/videos before sharing them to ensure that the photographs/videos do not reveal any sensitive or confidential information about Zoho that is likely to cause security concerns. In case you

are unsure if a photograph or video is appropriate, please seek advice from any of the contacts mentioned below before sharing such photographs/videos.

- 6. Respect copyright and Intellectual Property Rights. Don't just assume that you can use an image, just because you found it on the internet.
- 7. Do not engage in any underhand or unethical ways of increasing followers, likes, or other forms of social media engagements for any Zoho product. In case of doubts or clarifications with respect to any of the above, or situations that you feel have not

been addressed in the above mentioned points, please feel free to get in touch with any of the contacts

mentioned below. ANTI-SEXUAL HARASSMENT POLICY

Introduction

Zoho and its subsidiaries (collectively referred as "Zoho") recognize that the right to work with dignity is

a basic human right. Zoho is committed to providing a discrimination-free, harassment-free, and safe

work atmosphere for all its women employees, including temporary employees and trainees. This

Anti-sexual Harassment Policy has been developed to prohibit, prevent, and deter the acts of sexual

harassment at workplace and to provide the procedure for redressal of complaints pertaining to sexual

harassment.

Sexual Harassment

Sexual harassment includes any unwelcomed sexually-determined behavior such as physical contacts and

advances; sexually colored remarks; showing pornography; and sexual demands, by words or actions.

Such conduct can be humiliating and may constitute health and safety problems. It is discriminatory when

the victim has reasonable grounds to believe that his or her objection would disadvantage the victim in

connection with employment or that it might create a hostile working environment.

Constitution of Anti-Harassment Complaints Committee

In accordance with the guidelines laid down by the Supreme Court, a Harassment Complaints Committee

("committee") has been constituted to conduct enquiry and take appropriate actions for redressing harassment complaints.

The members of the committee and their contact details will be published in our internal portal (https://connect.zoho.com/portal/intranet/stream/105000031745804) and in the notice board.

The committee will consist of five (5) members among whom at least three (3) members must/will be

women.

The committee will be headed by the General Counsel. In addition, the committee will consist of the

following:

- 1. A senior women employee who has been working at Zoho for at least ten (10) years,
- 2. An employee from HR team,
- 3. An employee from Legal team, and
- 4. An independent member who is familiar with sexual harassment issues.

The quorum for the purpose of conducting any meeting or enquiry will be three (3) members.

Zoho shall fill the vacancy, if any, arising out of reasons such as retirement or resignation of any committee member, within a reasonable period. The name and contact details of the new member shall be

published on Zoho Corp Wall.

Procedure for Lodging Complaint

If you believe that you are being sexually harassed, or your colleague is being sexually harassed by one or

more other employees of Zoho Corp, you must report the incident to any member of the committee immediately in writing (including by email). If you need assistance for reducing the complaint to writing,

feel free to contact any member of the committee, your manager, or the HR team. They will assist you in

filing the complaint.

Enquiry Procedure

A committee member, upon receipt of a complaint from an employee, shall call for a committee meeting

within a week of receiving the complaint.

During such meetings, the committee shall prepare and hand over a statement of allegation to the person(s) against whom the complaint is made and give such person(s) an opportunity to submit a written

explanation within seven (7) days of the meeting.

The complainant shall be provided with a copy of the written explanation submitted by the person against

whom the complaint is made.

If the complainant or the person against whom complaint is made wishes for any witness(es) to be called.

the complainant or the person against whom complaint shall communicate in writing to the committee,

the names of such witness(es). The committee shall call upon all witnesses mentioned by both the parties

and record his/her/their evidence in writing.

If the complainant wishes to tender any documents by way of evidence before the committee, the complainant shall produce such documents. Similarly, if the person against whom complaint is made,

wishes to tender any documents in evidence before the committee, the said person shall produce such

documents.

The committee shall provide every reasonable opportunity to the complainant and to the person against

whom the complaint is made, to put forward and defend their respective cases.

The committee shall complete the enquiry within reasonable period but not beyond three months and

communicate its findings and its recommendations for action, to the HR team. In accordance with the

recommendations proposed by the committee, the HR Manager will take appropriate action against whom

the complaint is made. Appropriate action may include transfer, withholding promotion, suspension, or

even dismissal.

In case the committee concludes that the conduct of the person against whom the complaint is made

amounts to a specific offence under the Indian Penal Code, it shall be informed to the HR Manager. The

HR Manager shall initiate an appropriate action in accordance with the law, by filing a complaint with the

police. The employee, who is a victim of sexual harassment, may, in addition to the above, seek other

legal remedies available to the victim.

If the enquiry reveals that the allegations in the complaint are false or have been made with malicious

intent, appropriate disciplinary action will be taken against the complainant.

Documentation

All statements, responses, and decisions should be documented and signed by all members of the committee and the parties of the proceedings (including witnesses).

Harassment by an Outsider or a Third Party

If an employee is harassed as a result of an act by a third party or an outsider, Zoho will take all the necessary and reasonable steps to assist the affected employee, in terms of support and preventive actions.

Confidentiality

All information pertaining to the enquiry shall be kept confidential. Any person (including a witness) who

breaches confidentiality shall be subjected to disciplinary action.

Policy against Retaliation

Regardless of the outcome of the complaint, made in good faith, the employee lodging the complaint and

any person providing information or any witness, will be protected from any form of retaliation. While

dealing with complaints of sexual harassment, the committee shall ensure that the complainant or the

witnesses are not victimized or discriminated against by the accused. Any unwarranted pressures,

retaliatory, or any other type of unethical behavior from the accused against the complainant while the

investigation is in progress should be reported by the complainant to the committee as soon as possible.

The committee shall report such incidents to the HR Manager for disciplinary action to be taken