



Human Rights Due Diligence Process



Human Rights Due-Diligence Process

Introduction

Persistent System is committed to upholding human rights in all our operations, including those of our employees, contractors, and suppliers. We have a comprehensive risk management process in place to identify and mitigate potential risks or other potential issues related to our business, including new business relations such as mergers, acquisitions, and joint ventures etc., in our operations and our value chain. We have the relevant preventive, detective, and corrective controls in place to enable us to take timely actions to address, prevent, mitigate and type of remediation action plans to manage human rights violations within our own operations and value chain. Our assessment includes Human Rights issues such as Forced labor, Human trafficking, Child labor, Freedom of association, Right to collective bargaining, Equal remuneration for Equal work, Discrimination and safe workplace. The following groups are covered – employees, contractors working on our premises, children, women, suppliers and local communities. We also expect our suppliers to respect human rights when providing goods and services to our Company

Processes implemented to mitigate risk to Human Rights

Our comprehensive Human Rights policies serve as a guiding compass, outlining our unwavering commitment to upholding these fundamental principles in all our operations. Persistent System has a Compliance Management tool. This tool has an all-compliance checklist for the respective geographies. The Human Rights due diligence is conducted as per ISO 45001 to assess the Human Rights compliances. Our vendor partners working in Persistent System premises are assessed to ensure they are complying with the local statutory rules and law of the land. During FY2024, we provided ESG awareness training to our suppliers which covered topics relevant to Human Rights.

Human Rights Assessment

As part of our Human Rights Assessment, we have the relevant preventive, detective, and corrective controls in place to enable us to take timely actions to address, prevent, and manage human rights violations within our own operations and value chain. As part of our Risk assessment and due diligence process, the following groups are covered – employees, contractors working on our premises, children, women, suppliers and local communities. We also expect our suppliers to respect human rights when providing goods and services to our company. Human Rights assessments are conducted on a quarterly basis. All our India operations have been assessed by Persistent Internal Audit Team for Human Rights. Additionally we are 100% certified by an external agency for ISO14001:2015 and ISO 45001:2018. At our overseas locations, we have implemented processes aligned with legal requirements and ensure compliance across our global operations.

Goals and Progress

Human Rights focus	Goal	Progress
Employee health, safety and security	Maintain zero accidents in the workplace Zero tolerance for unethical and non-compliant behaviour	No incidents reported Zero Sexual Harassment cases
Data privacy and Protection	To be recognized as industry leader in information security and cloud practices	No security breaches reported
Human trafficking, child labor and forced labor	No child or forced labor	No cases of child labor or forced labor
Diversity and Inclusion	1. Achieve 35% of female representation in the workforce with special focus to increase women in the senior management. 2. To include people of all genders, ethnicities, sexual preferences, religions and specially-abled persons in our diverse workplaces	1. 29.5% gender diversity. 2. 58 nationalities 3. 45 Specially abled

Risk Mitigation and Remediation Action Process

With the assessment and our Human Rights policy as the guideline, we have identified the material topics that pose risks to Human Rights and have created a comprehensive framework to mitigate those risks, including remediation actions. Based on the assessments conducted by our Internal audit team and external audits by third party, no Human Rights issues were observed during the assessment and hence no remediation actions were expected.

Human Rights Mitigation & Remediation

Freedom of Association and Collective Bargaining	Employee health, safety and security	Data Privacy and Protection	Human Trafficking, Child labour, and Forced labour	Diversity and Inclusion
Risk	Risk	Risk	Risk	Risk
Withholding employee rights to expression and association	Sexual harassment or any 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.
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
	Unsafe and unhealthy workplace	Personal data breaches of employees or others can cause distress to data subjects whose personal data has been breached.	Forced labour	
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	Anti-human trafficking, child labour and forced labour policy in place.	Clear policies in place – Diversity Equity and Inclusion (DEI) Equal Employment Opportunity Robust grievance redressal mechanisms

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Mitigation and Remediation Action	Mitigation and Remediation Action	Mitigation and Remediation Action	Mitigation and Remediation Action	Mitigation and Remediation Action
Strong anti-retaliatory grievance redressal mechanisms	<p>Mandatory training on Safe Workplace for all employees and contractors</p> <p>Mandatory Code of Conduct training as a part employee induction programs.</p> <p>Awareness sessions on occupational health related topics</p>	Robust Information Security Management System (ISMS) aligned to ISO 27001.	Adequate checks in place at all entry points to prohibit employment of people below 18 years.	<p>DEI sensitization and awareness for managers, employees and contractors</p> <p>Unconscious bias training across all levels of the organization</p>
	<p>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</p>		Periodic assessments to ensure compliance	Employee Resource Groups to help create a safe, inclusive and respectful workplace for minority groups

About Persistent

We are a trusted Digital Engineering and Enterprise Modernization partner, combining deep technical expertise and industry experience to help our clients anticipate what's next. Our offerings and proven solutions create a unique competitive advantage for our clients by giving them the power to see beyond and rise above. We work with many industry-leading organizations world-wide including 14 of the 30 most innovative US companies, 80% of the largest banks in the US and India, and numerous innovators across the healthcare ecosystem. Our company fosters a values-driven and people-centric work environment. Our strength of over 22,500+ employees is spread over 18 different countries across the globe.

www.persistent.com

USA

Persistent Systems, Inc.
2055 Laurelwood Road, Suite 210
Santa Clara, CA 95054
Tel: +1(408) 216 7010
Fax: +1(408) 451 9177
Email: Info@persistent.com

India

Persistent Systems Limited
Bhageerath,402
Senapati Bapat Road
Pune 411016
Tel: +91(20) 6703 0000
Fax: +91(20) 6703 0008