

INFO EDGE (INDIA) LTD.

HUMAN RIGHTS POLICY

MEANING

Info Edge (India) Limited along with its wholly owned subsidiaries (“Info Edge” or “The Company”) upholds and promotes human rights and is inspired by key human rights tenets laid down by different national & international guidelines. As a responsible entity, we encourage policies and practices that demonstrate our support for these core human rights ideals towards our key stakeholders who help us make our business a success.

SCOPE AND APPLICABILITY

At Info Edge we are committed to respecting the fundamental rights of all the people directly or indirectly related to the Company’s businesses across the value chain which includes all individuals of the Company working at all the levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), trainees, volunteers, seconded staff, casual workers and agency staff, agents, or any other person associated with the Company (collectively referred to as “Associates”) and consultants, vendors, contractors, agents, intermediaries and associates of such third parties with whom the Company enters into contract (collectively referred to as “Business Partners”) and communities where it operates in. The requirements for our Business Partners to adhere to our human rights policy are also laid out in our Supplier Code of Conduct. Info Edge shall not enter into any form of business relationships with any Business Partner or potential business partner, if they are associated with any cases of human rights abuse across any region, they operate in.

VISION AND OBJECTIVES

Respecting human rights is a fundamental part of the Company. It is committed to reinforcing and upholding human rights through this Human Rights Policy. This policy is in line with United Nations Guiding Principles on Business and Human Rights. We have zero-tolerance against human rights violations, and we do our best to ensure that no abuse of human rights happens within any part of our business or supply chains. The Company also encourage its Associates, Business Partners, and community to speak up, without any fear of retaliation about any concerns they may have or any form of harassment faced by them at the workplace.

ROLES AND RESPONSIBILITIES

We strive to respect the human rights of all the employees and people associated with our business. All Associates and Business Partners are expected to abide by this policy. The Business Responsibility & Sustainability Reporting (“BRSR”) Committee will be responsible to review, update and make changes to this policy.

DEFINITIONS

Acts of human rights violation can be defined as

1. **Sexual Harassment**- includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:
 - i. physical contact and advances
 - ii. a demand or request for sexual favours

- iii. making sexually coloured remarks
 - iv. showing pornography
 - v. any other unwelcome physical, verbal or non-verbal conduct of sexual nature
2. **Discrimination**- refers to the unjust or prejudicial treatment of people, especially on the grounds of, but not limited to, caste, creed, sex, race, ethnicity, age, colour, religion, disability, socio-economic status, or sexual orientation.
 3. **Child Labour**- As per Sec 2(ii) of the Child Labour (Prohibition & Regulation) Act, 1986 (as amended), 'Child' means a person who has not completed his/her 14th year of age. It prohibits the employment of adolescents in the age group of 14 to 18 years in hazardous occupations and processes and regulates their working conditions where they are not prohibited.
 4. **'Forced Labour' or 'Involuntary Labour'**- refers to all work or service that is extracted under the menace of penalty. It also includes terms such as bonded labour and modern slavery. It also includes any labour for which the worker receives less than the government-stipulated minimum wage.

The following actions are some examples which can be considered as an act of violation of human rights of an Associate:

- Displaying offensive posters and/or screensavers at the workplace. Sending the same via messages and e-mails also entails violation of human rights
- Using abusive and derogatory language directed at associates through any media
- Unjustified comments on a fellow associate's work
- Use of threatening or insulting language and gestures such as shouting, physical and verbal assault etc
- Derogatory comments about someone's race, colour, sexual orientation, religion etc
- Exclusion of an associate or group from common workplace interactions, projects, social activities relating to work, and networks at work
- Insulting jokes about a particular gender

HUMAN RIGHTS POLICY STATEMENT

1. **Non- Discrimination & Equal Opportunity**

Info Edge is committed to building a work culture where all current and potential associates can compete within a fair, open, and transparent environment. The sole criteria for selection, promotion, remuneration and benefits are formed on merit in qualifications, performance and capabilities of individuals. The Company strives to being fair and equal in all our interactions with our Business Partners. Info Edge does not discriminate or tolerate discrimination against any race, religion, color, disability, medical condition, gender, nationality, gender identity, sexual orientation, age, marital status, pregnancy or any other legally protected status. The company also adheres to Equal Remuneration Act, 1976 and ensures to uphold not making discrimination against female associates in matters of transfers, training, promotion, etc.

2. **Diversity, Equity and Inclusion**

Info Edge is committed to workplace culture that is rich in diversity, is equitable with respect to all individuals' life journey and encourages inclusion. Info Edge's commitment to diversity and inclusion extends to all areas of our businesses. By creating an inclusive environment, we mean to create a place wherein every associate can have the opportunity to participate, contribute and develop freely and equitably.

Externally, Info Edge endeavours to ensure that services available are inclusive and accessible for all its stakeholders and/or Business Partners.

All our policies are written with the use of inclusive language, such that it raises no social stereotypes in relation to gender, race, age and avoids the use of words and phrases that create or maintain disadvantages or barriers for the people being referenced.

3. **Harassment-Free Workplace**

Info Edge treats all its associates with respect and dignity and provides a work environment that is free from all forms of harassment, intimidation, or humiliation- whether sexual, physical, verbal or psychological. This includes the behaviour and actions directed towards third parties during the course of conducting business. Prevention of Sexual Harassment Policy states that Info Edge is committed to provide a work environment that ensures every associate is treated with dignity and respect. The Company promotes a work environment that is conducive to the professional growth and equal opportunity.

4. **Freedom of Association**

Info Edge recognizes the Associate's right to communicate and associate with an association of their choice in matters related to their employment within the purview of the Company's policies and procedures.

5. **Prohibition of Child Labor and Forced Labor**

Info Edge is against any form of coerced or prison labour, human trafficking, use of physical punishments, or threats of violence of any form including but not limited to physical, sexual, psychological, or verbal abuse as a method of discipline or control.

We are against the exploitation of children through any form of work that deprives children of their childhood, interferes with their ability to attend school, and interferes with the mental, physical, social, or moral well-being of children. Moreover, we ensure to adhere and comply with all applicable laws and regulations pertaining to child and forced labour prohibition.

We require our Business Partners to prohibit the same in their operations.

6. **Safe Work Environment**

Info Edge is committed to focusing on holistic wellbeing and fitness of all Associates and strives to institutionalise health and safety processes. We have put in place several practices, policies, and provisions to ensure a safe and healthy work environment for Associates. The Company also has a Health and Safety policy in place that commits to adherence to all applicable legislations and the minimization of accidents, occupational illnesses, and injuries at work. The Company is also committed to engaging with its Associates to continually improving health and safety in the workplace, including the identification of hazards and remediation of health and safety issues.

7. **Data Privacy**

Info Edge is committed to protecting the data privacy of all its stakeholders including Associates and Business Partners. We have implemented technologies to safeguard data privacy and keep upgrading our systems as the need arises. We strive to implement reasonable and appropriate practices in our collection, use, storage and sharing of personal information about individuals. Further, we do not disclose information

to third parties without the explicit consent of our stakeholders, unless required by law or business to do so.

COMMUNICATION OF POLICY

The Company communicates transparently all necessary and relevant information with all the relevant stakeholders regarding policies and procedures related to human rights. This Policy shall be available on the internal portal and/or on the website of the Company.

GRIEVANCE REDRESSAL MECHANISM

The Company encourages all the Associates and other stakeholders to report actual or suspected violations of Human Rights to the BRSR committee at Infoedge.BRSR@infoedge.com. Through this Policy, the Company intends to encourage its Associates and Business Partners to report matters without risk of subsequent victimization, discrimination, or disadvantage.

Info Edge's Prevention of Sexual Harassment Policy encourages Associates to reach out to the Internal Committee if they have any complaint and provides in detail the process and timelines within which the complaint will be addressed.