

PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE POLICY

Yext India Private Limited

Version No.	2
Date	24 March 2026

1. Introduction and Scope

- 1.1. Yext India Private Limited (“**Yext**” or the “**Company**”) acknowledges that it has the responsibility of providing a safe and healthy working environment to all its Employees (*as defined below*) and prevent any form of sexual harassment at the workplace. Pursuant to the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013, the Company has prepared this policy to deal with matters related to sexual harassment at the workplace.
- 1.2. This policy is intended to be gender neutral and will apply uniformly in case of sexual harassment of any person, including Employees and any third persons associated with the Company.
- 1.3. While the policy covers aspects in compliance with the Act (*as defined hereinafter*), for any clarification, reference should be made to the Act. The provisions of the Act will prevail over this policy.

2. Applicability

The procedures and other details set out in this policy are applicable to all Employees including contract employees, interns/ trainees, consultants and service providers of the Company or a third party who is visiting workplace of the Company and is effective immediately.

3. Definitions

- 3.1. Words and expressions used herein but not defined will have the same meaning as assigned to it under the Act.
- 3.2. The following words will have the meaning ascribed therein:
 - (i) “**Act**” means Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules made thereunder;
 - (ii) “**Aggrieved Person**” in relation to Workplace (*as defined below*), means an individual, of any age whether employed or not, who alleges to have been subjected to any act of Sexual Harassment (*as defined below*) by the Respondent (*as defined below*);
 - (iii) “**Company**” means Yext India Private Limited;
 - (iv) “**Complaint**” means an allegation of Sexual Harassment submitted in writing to the Internal Committee under this policy;

- (v) “**Complainant**” means any Aggrieved Person (or if the Aggrieved Person is unable to make a Complaint on account of his/her physical or mental incapacity or death or otherwise) or any other person who makes a Complaint on behalf of the Aggrieved Person alleging Sexual Harassment under this policy;
- (vi) “**Employee**” means a person employed at a Workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the Company, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other name. In case an allegation of Sexual Harassment is made against a contract worker, the Company will work with the direct employer of the Respondent to decide how the matter should be dealt with;
- (vii) “**Employer**” means a person responsible for management, supervision and control of the Company;
- (viii) “**External Member**” means the external member of the Internal Committee who will be appointed from amongst non-governmental organizations or associations committed to the cause of women, or any person familiar with the issues relating to Sexual Harassment;
- (ix) “**Internal Committee**” means the committee constituted in terms of Clause 5 below;
- (x) “**Presiding Officer**” means the presiding officer of the Internal Committee;
- (xi) “**Respondent**” means a person against whom the Aggrieved Person has made a Complaint under this policy;
- (xii) “**Sexual Harassment**” has the meaning ascribed to it in Clause 4 below;
- (xiii) “**Special Educator**” means a person trained in communication with people with special needs in a way that addresses their individual differences and needs; and
- (xiv) “**Workplace**” means and includes: (i) the registered office of the Company, along with other such branches, locational offices, departments or units, if any; (ii) virtual offices or work from home; (iii) any physical or digital space provided by the Company where an Employee is connected to work, be it home, coffee shop or a hotel room (including any Company provided telecom or communication channels, including phone, email, video/audio conference tools, collaboration tools, etc.); and (iv) any other place visited by the Employee(s) during the course of employment including transportation provided for undertaking such a journey.
- (xv) Words and expressions used herein and not defined but defined in Act will have the same meaning as assigned to it under the Act.

4. Sexual Harassment

- 4.1. Sexual Harassment includes any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behavior or conduct was directed namely:
- (i) unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit;
 - (ii) physical contact and advances including (but not limited to) touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtones, molestation;
 - (iii) demand or request for sexual favors;
 - (iv) making sexually colored remarks or remarks of sexual nature about a person's clothing or body including but not limited to vulgar/ indecent jokes, letters, phone calls, text messages, emails, gestures, etc;
 - (v) getting request for video calls at odd hours, taking pictures, not maintaining a proper dress code during virtual meetings, staking by colleagues on social media;
 - (vi) threatening about performance ratings
 - (vii) showing pornography, making or posting sexual pranks, sexual teasing, innuendos and taunts with implicit sexual connotation, physical confinement and/ or touching against one's will, sexual jokes, signs sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS etc.;
 - (viii) display of pictures, signs etc. with sexual nature/ connotation/ overtones in the Workplace; or
 - (ix) any other unwelcome physical, verbal or non-verbal conduct of sexual nature
 - (x) verbal or non-verbal communication which offends the individual's sensibilities and affects her/his performance and has sexual connotation/ overtone/ nature.

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:

- (i) any implied or explicit promise of preferential treatment in the employment;
 - (ii) any implied or explicit threat or detrimental treatment in the employment;
 - (iii) any implied or explicit threat about the present or future employment status;
 - (iv) any interference with the work or creating an intimidating or offensive or hostile work environment; or
 - (v) any humiliating treatment likely to affect health or safety.
- 4.2. No person will be subjected to Sexual Harassment at any Workplace. Sexual Harassment in the Workplace is completely prohibited whether it involves co-worker harassment, harassment by a manager, applicants for employment, temporary agency personnel and contractors, customers or vendors, or harassment by or of persons doing business with or for the Company.
- 4.3. The overall conduct of a Respondent on the Aggrieved Person will be determined rather than whether a particular instance was intentionally offensive or not. Further, not only face to face harassment, but

Sexual Harassment by electronic means, including mobile, internet, social media, will also constitute Sexual Harassment under this policy.

5. Constitution of Internal Committee

5.1. The Internal Committee will consist of 4 (four) members to be nominated by the management, in the following manner:

- (i) The Presiding Officer of the Internal Committee will be a senior level woman Employee of the Company. For forming a committee, in case a senior level woman employee is not available, the Presiding Officer will be nominated from other offices or administrative units of the Workplace. Further in case the other offices or administrative units of the Company do not have a senior level woman employee, the Presiding Officer will be nominated from any other office or other department of the Company;
- (ii) At least 2 (two) members of the Internal Committee will be nominated from amongst the Employees, who will preferably be persons who are committed to the cause of women or have experience in social work or have legal knowledge;
- (iii) 1 (one) member of the Internal Committee will be appointed from amongst non-governmental organizations or associations committed to the cause of women, or any person familiar with the issues relating to Sexual Harassment (“**External Member**”); and
- (iv) At least 50% (fifty percent) of the members of the Internal Committee will be women.

5.2. Every member of the Internal Committee will hold office for a maximum period of 3 (three) years from the date of nomination to the Internal Committee. The management may, however, upon providing sufficient reasons in writing, change the constitution of the Internal Committee by removing any member(s) and/or appointing new member(s) at any time in accordance with the provisions of this policy. The members of the Internal Committee can be removed on grounds including but not limited to:

- (i) contravention of any provisions of this policy and/or the Act; or
- (ii) contravention of the obligation to maintain confidentiality; or
- (iii) has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him/her; or
- (iv) has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her; or
- (v) has so abused his/her position as to render his/her continuance in office prejudicial to the public interest.

5.3. Any vacancy created due to cessation of employment, resignation, death, disability or removal, as applicable, will be filled by a fresh nomination by the Company.

5.4. The names and contact details of all the members of the Internal Committee as appointed from time to time, will be displayed on the notice board.

6. Power and Function of Internal Committee

6.1. The Internal Committee will investigate every formal written Complaint of Sexual Harassment and will make recommendations to the Company regarding the actions to be taken against the Respondent.

6.2. The Internal Committee, may, before initiating an inquiry and at the request of the Aggrieved Person take steps to settle the matter between the parties through conciliation. However, no monetary settlement will be made as a basis of conciliation.

6.3. If a settlement has been arrived at between the Aggrieved Person and the Respondent, the Internal Committee will (i) record the settlement so arrived; (ii) forward the same to the management to take action as specified in its recommendation; (iii) provide a copy of the settlement so recorded to the Aggrieved Person and the Respondent; and (iv) not conduct any further inquiry into the Complaint.

6.4. Where the Respondent is an Employee and no settlement is arrived at between the Aggrieved Person and the Respondent, the Internal Committee will proceed to make an inquiry into the Complaint in accordance with the principles of natural justice as contained in Clause 8 below. If the terms of the settlement have not been complied with, the Internal Committee will proceed to make an inquiry in terms of Clause 8 below.

6.5. The Company will provide all necessary assistance to the Internal Committee for the purpose of ensuring full, effective and speedy implementation of the inquiry report in accordance with this policy and the Act.

6.6. In case a complaint of Sexual Harassment is made against a person who is not a direct employee of the Company (such as a contract worker) the Company will work with the direct employer of the Respondent to decide how the complaint is to be addressed.

6.7. The Internal Committee will on or before December 31 of every year, prepare, an annual report and submit the same to the Company. The annual report will contain the following details:

- (i) number of Complaints of Sexual Harassment received in the year;
- (ii) number of Complaints disposed of during the year;
- (iii) number of cases pending for more than 90 (ninety) days;
- (iv) number of workshops or awareness programme against Sexual Harassment carried out; and
- (v) nature of action taken by the Employer or District Officer.

6.8. The powers of Internal Committee will be the same powers as are vested in a civil court under the Code of Civil Procedure, 1908 when trying a suit in respect of the following matters, namely:

- (i) summoning and enforcing the attendance of any person and examining him on oath;
- (ii) requiring the discovery and production of documents: and
- (iii) any other matter which may be prescribed as per applicable laws.

7. Complaint of Sexual harassment

- 7.1. Any individual who is a victim of Sexual Harassment at the Workplace, may make a formal Complaint by writing to YextICCCommittee@yext.com or to any member of the Internal Committee.
- 7.2. The Complaint should be in writing and can be in the form of a letter or an email, along with supporting documents and details such as description of incident, date and time (as available), the names and addresses of the witnesses, circumstances preceding and following the incident to be recorded. If in letter form, the Complainant will be required to submit 6 (six) copies of the Complaint.
- 7.3. The Complainant may also contact the Presiding Officer or any member of the Internal Committee individually.
- 7.4. In certain special circumstances, where the Aggrieved Person is unable to make the Complaint, on account of his/her physical incapacity the Internal Committee may allow following to make the Complaint on behalf of the Aggrieved Person:
 - (i) his/her relative or friend or co-worker; or
 - (ii) an officer of the National Commission for Women or State Women's Commission; or
 - (iii) any person who has knowledge of the incident, with the written consent of the Aggrieved Person.
- 7.5. If the Aggrieved Person is unable to make a Complaint on account of his/her mental incapacity, a Complaint may be filed by:
 - (i) his/her relative or friend or co-worker; or
 - (ii) a Special Educator; or
 - (iii) a qualified psychiatrist or psychologist; or
 - (iv) the guardian or authority under whose care he/she is receiving treatment or care; or
 - (v) any person who has knowledge of the incident jointly with the Aggrieved Person's relative or friend or a Special Educator or qualified psychiatrist or psychologist, or guardian or authority under whose care he/she is receiving treatment or care.

Further, if the Aggrieved Person is deceased, a Complaint may be filed by any person who has knowledge of the incident, with the written consent of his/her legal heir.

- 7.6. If the Aggrieved Person for any other reason is unable to make a Complaint, a Complaint may be filed by any person who has knowledge of the incident, with his/her written consent.

- 7.7. The Internal Committee will also help / advise the Aggrieved Person in case the Aggrieved Person wants to file a police complaint.
- 7.8. The Complaint should be made within 3 (three) months from the date of occurrence of the alleged incident and in case of series of incidents, within a period of 3 (three) months from the date of the last incident. The Internal Committee may, at its sole discretion, extend this time limit by up to 3 (three) more months if it is satisfied that the circumstances were such which prevented the Aggrieved Person from filing the Complaint within the period of 3 (three) months.
- 7.9. On receipt of the Complaint, the Presiding Officer and the External Member will evaluate if any of the members of the Internal Committee are involved in or closely connected with the Complaint so as to result in a conflict of interest with the parties involved. In the event of a conflict of interest, the Presiding Officer and the External Member may ask the Company to replace such members on the Internal Committee, for the purpose of investigation into the relevant Complaint.

8. Conduct of Proceedings

- 8.1. The Internal Committee will normally forward a copy of Complaint to the Respondent, within 7 (seven) working days from receipt of the Complaint.
- 8.2. The Respondent will file her/his reply to the Complaint along with her/his list of documents and names and addresses of witnesses within a period of 10 (ten) working days from the date of receipt of the Complaint from the Internal Committee. The Internal Committee will make an inquiry into the Complaint in accordance with the principles of natural justice. The Internal Committee will notify in writing the time and dates of its meetings to the Company, the Complainant and the Respondent, not less than 5 (five) days in advance of any such meeting.
- 8.3. A minimum of 3 (three) members of the Internal Committee including the Presiding Officer will be present while conducting the inquiry.
- 8.4. The Complainant and the Respondent will both appear either in person or virtually through audio/video conferencing facility, as the members of the Internal Committee may deem fit and defend themselves before the Internal Committee and cannot be represented by a legal practitioner at any stage of the inquiry.
- 8.5. The Complainant and the Respondent will have the right to lead evidence and the right to cross-examine witnesses of the other party, as the case may be. All documents to be submitted either by the Aggrieved Person or the Respondent to the Internal Committee will be true copies.
- 8.6. The inquiry will be completed within a period of 90 (Ninety) days.

- 8.7. On the completion of an inquiry of Sexual Harassment, the Internal Committee will submit an electronic copy of the report of its findings to the Presiding Officer. The report will recommend action to be carried out by the Human Resources Manager.
- 8.8. Within a period of 10 (ten) days from the date of completion of the inquiry the report will be made available to the concerned parties. The Employer will act upon the recommendation of the Internal Committee within 60 (sixty) days of its receipt of the recommendations.
- 8.9. Both the Complaint and the Respondent (unless specifically exempted by the Internal Committee in writing) will be required to attend every hearing that they have been called for. If either party fails to attend 3 (three) consecutive hearings without sufficient cause, the Internal Committee may terminate the inquiry or pass an *ex parte* order with 15 (fifteen) days' notice.
- 8.10. Minutes of every meeting of Internal Committee will be recorded.

9. Action during pendency of inquiry

- 9.1. During the pendency of an inquiry, on a written request made by the Complainant, the Internal Committee, may recommend the following actions to be taken –
 - (i) transfer the Aggrieved Person or the Respondent to any other workplace; or
 - (ii) grant leave to the Aggrieved Person up to a period of 3 (three) months which will be in addition to the leave he/she would be otherwise entitled to under the service rules of the Company: or
 - (iii) restrain the Respondent from reporting on the work performance of the Aggrieved Person or writing his/her confidential report and assign the same to another officer; or
 - (iv) any other relief to the Aggrieved Person as the Internal Committee deems fit/ as may be prescribed under the applicable law.
- 9.2. On receiving a recommendation from the Internal Committee, the Company will implement the recommendations and send a report of such implementation to the Internal Committee.

10. Disciplinary Action by the Company

- 10.1. If the Internal Committee arrives at the conclusion that the allegation against the Respondent has been proved, it may recommend to the Company to:
 - (i) take any action against the Respondent by treating Sexual Harassment as a misconduct, including the following:
 - (a) require the Respondent to submit a written apology to the Aggrieved Person;

- (b) require the Respondent to undergo a counselling session or carry out community service;
 - (c) issue a written warning, reprimand or censure to the Respondent;
 - (d) withhold the promotion of the Respondent;
 - (e) withhold any pay raise, or increment of the Respondent; or
 - (f) terminate the employment or other engagement of the Respondent with the Company without any notice or payment in lieu of notice.
- (ii) deduct from the salary of the Respondent or other amount payable to the Respondent by the Company, such sum as it considers appropriate to be paid to the Aggrieved Person or his/her legal heirs.
- 10.2. For the purpose of determining the sums to be paid to the Aggrieved Person or the legal heirs, as the case maybe, the Internal Committee will take into consideration:
- (i) mental trauma, pain, suffering and emotional distress caused to the Aggrieved Person;
 - (ii) loss in the career opportunity due to the incident of Sexual Harassment;
 - (iii) medical expenses incurred by the Aggrieved Person for physical or psychiatric treatment;
 - (iv) income and financial status of the Respondent; and
 - (v) feasibility of such payment in lump sum or in installments.
- 10.3. If based on the inquiry report of the Internal Committee, the Company is unable to make any deduction from the salary or any other amount payable to the Respondent by the Company due to him being absent from duty or cessation of employment/other engagement, the management may direct the Respondent to pay such sum directly to the Aggrieved Person. If the management informs the Internal Committee that the Respondent has failed to pay such sum to the Aggrieved Person, the Internal Committee may forward the order to the concerned district officer for recovery of the sum.
- 10.4. If the Internal Committee arrives at a conclusion that the allegation against the Respondent is malicious or the Aggrieved Person has made the Complaint knowing it to be false or has produced any forged or misleading document, it may recommend to the management to take no action against the Respondent. It will further recommend the management to take, amongst others, any of the following actions against the Aggrieved Person:
- (i) require the Aggrieved Person to submit a written apology to the Respondent; or
 - (ii) require the Aggrieved Person to undergo a counselling session or carry out community service;
 - (iii) issue a written warning, reprimand or censure to such Aggrieved Person; or
 - (iv) withhold the promotion of such Aggrieved Person; or
 - (v) withhold any pay rise or increment of such Aggrieved Person; or
 - (vi) terminate the employment or other engagement of such Aggrieved Person with the Company without any notice or payment in lieu of notice.

- 10.5. It is clarified that mere inability to substantiate a Complaint or provide adequate proof will not attract such action against the Aggrieved Person. Further, the malicious intent on part of the Aggrieved Person will be established only after a due inquiry is undertaken by the Internal Committee.
- 10.6. If the Internal Committee arrives at a conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading document, it may direct the management to take action against the witness, as it may deem necessary.
- 10.7. If the Aggrieved Person desires to take criminal action against the Respondent, there will be no objection by the Internal Committee and the Company. In such an event, the Company will attempt to provide all reasonable assistance to the victim. The Company may also choose to initiate criminal proceedings against the Respondent.
- 10.8. The disciplinary action recommended will be disclosed to the Respondent and the Complainant.
- 10.9. The Company will act upon the recommendation given by the Internal Committee within 60 (sixty) days of receipt of the recommendation.

11. Confidentiality

- 11.1. To protect the interests of the Aggrieved Person, the Respondent, witnesses and others who may assist with the inquiry into a Complaint of Sexual Harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances. Any Employee of the Company who breach the confidentiality of the inquiry process would be liable for disciplinary action up to and including termination.
- 11.2. The following information will not be published, communicated or made known to the public, press and media in any manner:
 - (i) contents of Complaint;
 - (ii) the identity and addresses of the Aggrieved Person, Respondent and witnesses;
 - (iii) any information relating to conciliation and inquiry proceedings; and
 - (iv) recommendations of the Internal Committee and the action taken by the Employer under the provisions of this policy and/or the Act.
- 11.3. Further, all the Internal Committee members, the investigating Human Resources Manager and any other Yext personnel involved in the inquiry and /or subsequent remediation process would sign a Confidentiality & Non-Disclosure Undertaking declaring that they would maintain utmost confidentiality on all matters discussed under the purview of the Act and this policy.

12. Appeal

- 12.1. Any party aggrieved with any of the recommendations of the Internal Committee as contained in the inquiry report or with the non-implementation of such recommendation(s), may appeal to the prescribed appellate authority within a period of 90 (ninety) days from the date of the recommendations.

13. Miscellaneous

- 13.1. The Company will take all possible steps to ensure that any Employee who brings a Sexual Harassment Complaint or any Employee who assists in investigation of such a Complaint will not be adversely affected in terms and conditions of employment or other engagement with the Company, discriminated against or discharged because of the Complaint. Any individual who believes that she/he is experiencing retaliation, by way of intimidation, pressure to withdraw the case or threats for reporting, testifying or otherwise participating in the proceedings, should report this to the Internal Committee or the Human Resources Department or the Legal Department, as considered feasible, and the Company will then address the concerns raised. Any person who is found to be guilty of retaliation may be subject to appropriate disciplinary action including dismissal from service. Anyone who abuses this procedure (for example, by maliciously putting an allegation knowing it to be untrue) would also be subject to disciplinary action including dismissal from service.
- 13.2. The Company will conduct trainings/sensitivity workshops for all Employees (in-person/online awareness program, ideally once in a year). Each such workshop will be conducted to educate employees on the laws relating to Sexual Harassment as well as training on procedures and rules to be followed by Employees at the Workplace.
- 13.3. A copy of this policy will be provided to all employees recruited and will also be placed on Confluence to which all the employees have access. All such employees / new recruits will sign a statement acknowledging that they have received or accessed the policy, and have understood, accepted and are willing to abide by the policy.
- 13.4. The Company reserves the right to alter, add to, vary or substitute any of the provisions of the policy at any time, in compliance with the Act. Any updates to the policy will be intimated to all employees.