



CODE OF ETHICS

Introduction

We believe and acknowledge that each and every employee is a valued member of our workforce. Our goal is to cultivate and preserve a positive culture and foster a working environment where all of our employees are treated with dignity and respect.

Non-discrimination and Equal Opportunity for Employment

We have zero tolerance for workplace discrimination or harassment. In recruiting and promoting our employees, hiring our contractors and all other HR processes, decisions are made without regard to the race, color, national origin, citizenship, religion, ancestry, disability (either physical, mental, or neurological), medical condition, gender identity or gender expression, age, marital status, sexual orientation, veteran status, or any other characteristics protected by law.

Harassment in any form--verbal, physical, or visual--is strictly prohibited in workplace. If you believe that either you or a coworker is being harassed or discriminated against by any of our employees, partners, or vendors, please report such incidents to the human resources (HR) team. HR will take timely and appropriate action after conducting a thorough inquiry.

Anti-Slavery

Forced labor, slavery, human trafficking, and child labor in all forms are prohibited at Zoho. We rigorously ensure that our contractors, subcontractors, vendors, suppliers, partners and others in our supply chain do not engage in any practice that constitutes forced labor, slavery, human trafficking, or child labor.

Privacy

We respect our employees' privacy and protect our employees' personal information disclosed by our employees in connection with their employment. We mandate that all our employees to protect the privacy rights of coworkers and handle all employees' personal information in accordance with this code of conduct. However, please do not expect privacy, when using the Zoho's resources and facilities.

Safe and Positive Work Atmosphere

We are committed to providing a safe, secure, productive, violence-free, healthy, and drug-free work space for our employees and expect our employees to extend their cooperation to keep up our commitment to these goals. We will not tolerate any act of violence or threat of violence towards any person or property. Our employees are prohibited from possessing, selling, or using any illegal substances in the workplace.

Conflict of Interest

A conflict of interest may occur when you or your family member(s) receive a personal benefit as a result of your position at Zoho. Some instances of conflicts of interest include but are not limited to:

- External paid projects or outside employment

- Business opportunities found through work
- Investing in Zoho's competitors
- Business relationships with friends or relatives

Our employees and suppliers should avoid situations that may create or appear to create a conflict between personal benefit and Zoho's interest. If it is not possible to avoid participating in the event or activity creating the conflict, inform existence of the conflict to the HR team and avoid participating in decision-making process.

In other words, avoid participating in an activity involving Zoho and your family members or friends. This includes getting involved in the recruitment process when your relative or close friend is being considered for a position and getting involved in the selection of a vendor or a contractor when your relative or friend is associated with the vendor or contractor. However, Zoho does not prohibit relatives from working together.

Romantic Relationships

Zoho does not prohibit its employees from having relationships with other employees, as long as such relationships do not create conflicts of interest or expose Zoho to legal and/or reputational liability. The work roles and responsibilities of the employees concerned are some of the criteria that determine whether such relationships may present conflicts of interest or expose Zoho to legal/reputational liability. In particular, individuals who are romantically involved cannot be in the same report line. When the roles/positions of the employees involved in a relationship are such that an actual, perceived, or potential conflict of interest is likely to arise, kindly inform the HR team or your manager about the situation. In case it is found that a serious conflict of interest may arise, one of the employees may be asked to move to a different team.

We require you to conduct yourself professionally when you are within the office premises and not to engage in any overt displays of affection and intimacy.

Gifts and Entertainment

Employees are prohibited from offering or accepting business courtesies having significant value, in any form. The appropriateness of offering or accepting business courtesies depends on the circumstances and parties involved. Avoid business courtesies which may create or appear to create a sense of obligation or compromise of professional judgment. You are required to obtain approval from your manager or HR to offer or accept business courtesies, like gifts and entertainment, if market value of such business courtesy is more than \$100. If you have any questions, please contact your manager or HR.

Confidential Information

Information that is regularly encountered by employees in the course of their work duties is considered to be confidential if it is shared outside a team or outside the company. In this capacity, confidential information shall be deemed to include, but not be limited to, all information concerning Zoho products, services, trade secrets, business plans, marketing strategies, customers, vendors, partners, anything related to company profits, income, or expense, and others, as well as most any information related to Zoho customers and prospects, including but not limited to the names of individuals or organizations, Zoho products they may use, the number of seats or licenses they purchase, and so on. Ensure that confidentiality and integrity of such information is protected. This responsibility extends also to third parties' confidential information received under non-disclosure agreements. Confidential information may be disclosed on a need-to-know basis in accordance with applicable non-disclosure agreements. However, confidential information shall not be disclosed to persons having no specific need to know.

such confidential information. We respect our competitors and we are committed to having fair competition. Employees who acquired or had access to our competitor's confidential information prior to their employment with Zoho, shall not use, replicate or disclose or publish such confidential information in any format during their employment with Zoho. If you are not sure whether to use or disclose specific information, contact the legal team for assistance.

All business communications, records, and comments are to be fair, accurate, and clear. Please keep in mind that if any misleading or bad-faith statement is used in a business communication, it may lead to claims such as misrepresentation, fraud, unfair disclosure, and antitrust violations.

Zoho encourages employees to use social media or any public forum to promote innovation. Guidelines governing policies regarding participation in social and public media are enumerated in our Social Media Policy.

Resource Usage

Zoho's intellectual property is its valuable asset. Make sure that it is not used other than for the purposes allowed. If you have any questions regarding usage of Zoho's intellectual property, please contact your manager.

Zoho may permit you to use or access its equipment, tools or facilities to perform your job efficiently and effectively. Employees are expected to use such properties for the benefit of Zoho and not for their personal benefit. Apply your best judgment while using such properties. If you spend money on behalf of Zoho, maintain appropriate records for money spent and submit accurate reports to the finance team. In case you enter into any agreement or contract on behalf of Zoho with any third party, make sure that you do so with prior approval from the legal team.

Ensure that you follow security policies. Make sure that you do not by-pass access controls. If you lose any equipment or if you believe that your password has been compromised, immediately report such instances to IT. They will help you out.

Serve the Customers

We are committed to providing world-class products and services. To that end, the trust our customers have in us is our most valuable asset. Each and every one of us here at Zoho is expected to preserve and strive to earn the trust of our customers on an ongoing basis. We recognize that the quality of the products and services we deliver, as well as the way we treat our customers will help us to preserve our customers' trust.

Our customers share their personal information with us based on the assurance that we will take appropriate measures to protect the security of such information. Make sure that you, as a part of Zoho's global workforce, keep Zoho's commitments and protect the privacy and security of customers' data.

All Zoho employees are therefore expected to adhere to all guidelines set out by our IT and SysAdmin teams, as well as by our Compliance Teams, at all times. The care with which we treat not only customer data but also our own electronic devices

Corporate Social Responsibilities

Zoho recognizes the responsibilities it has towards society, and is committed to conducting its business in an ethically, legally, and socially responsible manner. To fulfill its obligation to society, Zoho is committed to building a

sustainable business and give back to society.

Zoho respects internationally proclaimed human rights. We treat each and every person with whom we conduct business, with dignity and respect. Forced labor and child labor in any form is prohibited at Zoho. Zoho recognizes the value and importance of protecting the global environment and believes in sustainable development.

Compliance with Laws

Zoho is committed to complying with all applicable laws. Ignorance of law is not an excuse. So make sure that your act does not violate laws including, but not limited to, competition laws, anti-bribery laws (including the Prevention of Corruption Act) and insider trading laws. If you are not sure whether your act violates any laws, please contact the legal team or HR for assistance.

Reporting Violations

Zoho encourages and expects all employees to report suspected misconduct by other employees and by management through established channels. We will take appropriate action after conducting an inquiry. All discussions and communications made during the inquiry will be treated as confidential unless the law mandates disclosure. We take all complaints seriously, however, making false allegations with *mala fide* intention may result in disciplinary proceedings against the complainant.

Any failure to report violations as required by this Policy shall constitute misconduct and may subject an employee to disciplinary action.

Protection of Whistleblowers

Retaliation in any form is prohibited and against Zoho's code of ethics. We are committed to protecting whistleblowers against any unfair practices like retaliation, threat, or intimidation of termination/suspension of services. Zoho will take whatever action is necessary and appropriate to address violations of this policy.

This code is not comprehensive. There may be situations which are not addressed in this code. In such situations, apply your best judgment. You can also contact your manager or the HR team for guidance or assistance.

I hereby certify that I have read and understood the points specified above.

Signature

Name

Role/Title

Date



CONFIDENTIALITY AGREEMENT

This Confidentiality ("Agreement") is entered into between _____ ("Employee") and Zoho Corporation, including its affiliates, a California corporation, having its principal office at 4141 Hacienda Drive, Pleasanton, CA 94588, USA ("Zoho").

RECITALS:

A. Employee acknowledges that Zoho desires to protect its confidential proprietary information, that his/her employment creates a duty of trust and confidentiality to Zoho with respect to its confidential proprietary information and, as a condition of employment or continued employment with Zoho, Employee agrees to be bound by the terms of this Agreement.

WHEREFORE, Zoho and Employee agree as follows:

I: CONFIDENTIAL INFORMATION

A. The terms "Confidential Information" and "Proprietary Data" mean trade secrets, information, and data not generally known outside the company concerning Zoho or its businesses and Zoho's business and technical information, including but not limited to, patent applications, information relating to inventions, discoveries, products, plans, calculations, concepts, design sheets, design data, system design, blueprints, computer programs, algorithms, software, firmware, hardware, manuals, drawings, photographs, devices, samples, models, processes, specifications, instructions, research and development, test procedures and results, equipment, identity and description of computerized records, customer lists, supplier identity, marketing and sales plans, financial information, staffing information, employee performance, the compensation of other employees, business plans, costs, pricing information, works of authorship, improvements, anything manufactured or sold by Zoho, and all other concepts or ideas involving or reasonably related to the business or prospective business of Zoho, or information received by Zoho as to which there is a bona fide obligation, contractual or otherwise, on Zoho's part, not to disclose same.

B. Employee understands and agrees that the Confidential Information and Proprietary Data constitute trade secrets of Zoho and that at all times material to this Agreement, Zoho has taken all reasonable steps to protect the confidentiality of this information.

C. Employee agrees not to use Confidential Information and/or Proprietary Data for the benefit of any other person, corporation or entity, other than Zoho, during the term of employee's employment with Zoho, or any time thereafter.

D. Employee agrees that the Confidential Information and Proprietary Data shall be and remain the exclusive property of Zoho and shall not be removed from the premises of Zoho under any circumstances whatsoever without the prior written consent of Zoho, and if removed, shall be immediately returned to Zoho upon any termination of Employee's employment, and no copies thereof may be kept by Employee.

E. All notes, notebooks, memorandums, computer disks and other similar repositories of information containing or relating in any way to Confidential Information and/or Proprietary Data shall be the property of Zoho. All such items

made or compiled by Employee or made available to Employee during the period of employment, including all copies thereof, shall be held by Employee in trust and solely for the benefit of Zoho and shall be delivered to Zoho by Employee upon termination of employment with Zoho, or at any other time upon the request of Zoho.

II: INVENTIONS

A. Employee shall promptly disclose to Zoho, in writing, all inventions, ideas, discoveries, and improvements whether or not patentable or registrable under Copyright or similar statutes, made or conceived or reduced to practice or learned by Employee, either alone or jointly with others, during the period of employment with Zoho. Employee agrees that all such inventions (intellectual, visual or material) are the sole property of Zoho, with the exception of inventions, ideas, discoveries, and improvements described in Section C below.

B. Employee assigns to Zoho all right, title and interest in and to any and all inventions, ideas, discoveries, and improvements, with the exception of inventions, ideas, discoveries, and improvements described in Section C below.

C. This Agreement does not require assignment of an invention for which no equipment, supplies, facility, or trade secret information of the employer was used and which was developed entirely on Employee's time, and (a) which does not relate to the business of Zoho or to Zoho's actual or demonstrably anticipated research or development, or (b) which does not result from any work performed by Employee for Zoho.

III: MISCELLANEOUS PROVISIONS

A. After termination of employment with Zoho, Employee agrees that if he/she engages in employment or other activities independently or in association with others in any business competitive with any business of Zoho or any business which may reasonably be expected to compete with any business of Zoho, Employee is required to inform the prospective employer or association that Employee cannot divulge any secrets or Confidential or Proprietary Information that Employee may have learned during Employee's employment with Zoho.

A. All provisions of this Agreement shall be severable for purposes of enforcement. If any provision or clause of this Agreement is unenforceable at law or in equity, such clause or provision shall be severed from the remainder of this Agreement, and the remainder of this Agreement shall continue to be enforceable, according to its terms.

B. This Agreement shall be interpreted under and governed by the laws of the State of California as applied to an agreement made and wholly performed within said State.

C. This Agreement constitutes the entire agreement between the parties hereto relating to the subject matter hereof and supersedes any previous agreements between the parties relating to inventions and confidentiality.

Employee

Signature of Employee

Date



ZOHO IT Services Acceptable Use Policy

ZOHO IT Service's intentions for publishing an Acceptable Use Policy are not to impose restrictions that are contrary to ZOHO's established culture of openness, trust and integrity. ZOHO IT Service is committed to protecting ZOHO's employees, partners and the company from illegal or damaging actions by individuals, either knowingly or unknowingly.

IT Infrastructure is the property of ZOHO and should be used for business purposes in serving the interests of the company, and of our clients and customers in the course of normal operations.

Effective security is a team effort involving the participation and support of every ZOHO employee and affiliate who deals with information and/or information systems. It is the responsibility of every IT Infrastructure user to know these guidelines, and to conduct their activities accordingly.

2.0 Purpose

The purpose of this policy is to outline the acceptable use of IT Infrastructure of ZOHO. These rules are in place to protect employees and ZOHO. Inappropriate use exposes ZOHO to risks including virus attacks, compromise of network systems and services, and legal issues.

3.0 Scope

This policy applies to employees, contractors, consultants, trainees and other workers at ZOHO, including all personnel affiliated with third parties.

4.0 Policy

4.1 General Use and Ownership

1. While ZOHO's IT Services Department desires to provide a reasonable level of privacy, users should be aware that the data they create on the corporate systems remains the property of ZOHO. Because of the need to protect ZOHO's network, management cannot guarantee the confidentiality of information stored on any device belonging to ZOHO.
2. Employees are responsible for exercising good judgment regarding the reasonableness of personal use.
3. All sensitive information should be handled with care in accordance with ZOHO Information Sensitivity Policy.
4. For security and network maintenance purposes, authorized individuals within ZOHO may monitor equipment, systems and network traffic at any time.

4.2 Security and Proprietary Information

1. The user interface for information contained on IT Infrastructure-related systems should be classified as either confidential or not confidential, as defined by Information Sensitivity Policy. Examples of confidential information include but are not limited to: company private, competitor sensitive, trade secrets, customer lists, customer data and research data. Employees should take all necessary steps to prevent unauthorized access to this information.

2. Keep passwords secure and do not share accounts. Authorized users are responsible for the security of their passwords and accounts. System level passwords and user level passwords should be changed periodically.
3. It is encouraged to secure all PCs, laptops and workstations with a password-protected screensaver with the automatic activation feature.
4. Use encryption of information in compliance with ZOHO IT Service's Acceptable Encryption Use policy.
5. Because information contained on portable computers is especially vulnerable, special care should be exercised.
6. Protect laptops in accordance with the "Laptop Security Tips".
7. Postings by employees to newsgroups, external blogs and forums should contain a disclaimer stating that the opinions expressed are strictly their own and not necessarily those of ZOHO, unless posting is in the course of business duties.
7. All hosts used by the employee that are connected to the ZOHO IT Infrastructure, whether owned by the employee or ZOHO, shall be continually executing approved virus-scanning software with a current virus database unless overridden by departmental or group policy.
8. Employees must use extreme caution when opening e-mail attachments received from unknown senders, which may contain viruses, e-mail bombs, or Trojans.

4.3. Unacceptable Use

The following activities are, in general, prohibited.

Under no circumstances is an employee of ZOHO authorized to engage in any activity that is illegal under local, state, country or international law while utilizing ZOHO-owned resources.

The lists below are by no means exhaustive, but attempt to provide a framework for activities which fall into the category of unacceptable use.

System and Network Activities

The following activities are strictly prohibited, with no exceptions:

1. Violations of the rights of any person or company protected by copyright, trade secret, patent or other intellectual property, or similar laws or regulations, including, but not limited to, the installation or distribution of "pirated" or other software products that are not appropriately licensed for use by ZOHO.
2. Unauthorized copying of copyrighted material including, but not limited to, digitization and distribution of photographs from magazines, books or other copyrighted sources, copyrighted music, copyrighted third party code and the installation of any copyrighted software for which ZOHO or the end user does not have an active license is strictly prohibited.
3. Exporting software, technical information, encryption software or technology, in violation of international or regional export control laws, is illegal. The appropriate management should be consulted prior to export of any material that is in question.
4. Introduction of malicious programs into the network or server (e.g., viruses, worms, Trojan horses, e-mail bombs, etc.).
5. Revealing your account password to others or allowing use of your account by others. This includes family and other household members when work is being done at home.
6. Using a ZOHO computing asset to actively engage in procuring or transmitting material that is in violation of HR policy guidelines.

7. Effecting security breaches or disruptions of network communication. Security breaches include, but are not limited to, accessing data of which the employee is not an intended recipient or logging into a server or account that the employee is not expressly authorized to access, unless these duties are within the scope of regular duties.
8. Port scanning or security scanning of devices, computers used for ZOHO Corporate use is expressly prohibited unless prior notification to ZOHO IT Services is made.
9. Executing any form of network monitoring which will intercept data not intended for the employee's host, unless this activity is a part of the employee's normal job/duty.
10. Circumventing user authentication or security of any host, network or account.
11. Using any program/script/command, or sending messages of any kind, with the intent to interfere with, or disable a user's terminal session, via any means, locally or via the IT Infrastructure.

Email and Communications Activities

1. Sending unsolicited email messages (spam), including the sending of "junk mail" or other advertising material to individuals.
2. Any form of harassment via email, telephone or paging, whether through language, frequency, or size of messages.
3. Unauthorized use, or forging, of email header information.
4. Solicitation of email for any other email address, other than that of the poster's account, with the intent to harass or to collect replies.
5. Creating or forwarding "chain letters", "Ponzi" or other "pyramid" schemes of any type.
6. Use of unsolicited emails originating from within ZOHO's networks of other Internet/Intranet/Extranet service providers on behalf of, or to advertise, any service hosted by ZOHO or connected via ZOHO's network.

4.4. Blogging in External Blogs

1. Blogging by employees, whether using ZOHO's property and systems or personal computer systems, is also subject to the terms and restrictions set forth in this Policy. Blogging from ZOHO's systems is also subject to auditing.
2. ZOHO's Information Sensitivity policy also applies to blogging. As such, Employees are prohibited from revealing any ZOHO confidential or proprietary information, trade secrets or any other material covered by ZOHO's Information Sensitivity policy when engaged in blogging.
3. Employees shall not engage in any blogging that may harm or tarnish the image, reputation and/or goodwill of ZOHO and/or any of its employees. Employees are also prohibited from making any discriminatory, disparaging, defamatory or harassing comments when blogging.
4. Employees are expected to reveal their identity while posting in external forums/blogs and while participating/indulging in topics that are directly related to the company's activities.
5. Employees may also not attribute personal statements, opinions or beliefs to ZOHO when engaged in blogging. If an employee is expressing his or her beliefs and/or opinions in blogs, the employee may not, expressly or implicitly, represent themselves as an employee or representative of ZOHO. Employees assume any and all risk associated with blogging.
6. Apart from following all laws pertaining to the handling and disclosure of copyrighted or export controlled materials, ZOHO's trademarks, logos and any other ZOHO intellectual property may also not be used in connection with any blogging activity.
7. For internal blogging guidelines refer to HR guidelines.

5.0 Enforcement

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

6.0 Definitions Term Definition

Blogging :

- Writing a blog: A blog (short for weblog) is a personal online journal that is frequently updated and intended for general public consumption.
- Spam : Unauthorized and/or unsolicited electronic mass mailings.
- IT Infrastructure : Internet/Intranet/Extranet-related systems, including but not limited to computer equipment, software, operating systems, storage media, network accounts providing electronic mail, web browsing, and FTP.

I hereby certify that I have read and understood the terms and conditions specified above.

Signature of Employee

Employee Name

Role/Title

Date



Discrimination and Harassment Prevention and Complaint Policy

Purpose/Objective

Zoho Corporation is committed to providing equal employment opportunities to all employees and applicants without regard to age, ancestry, color, religious creed (including religious dress and grooming practices), denial of family and medical care leave, disability (mental and physical), including HIV and AIDS, marital status, medical condition (cancer and genetic characteristics), genetic information, military and veteran status, national origin (including language use restrictions), race, sex (including pregnancy, child birth, breastfeeding and medical conditions related to pregnancy, child birth or breastfeeding), gender, gender identity and gender expression, sexual orientation, or any other protected status in accordance with all applicable federal, state and local laws.

In addition, Zoho Corporation is committed to providing a work environment that is free of unlawful harassment. In furtherance of this commitment, the company strictly prohibits all forms of unlawful harassment, including harassment on the basis of age, ancestry, color, religious creed (including religious dress and grooming practices), denial of family and medical care leave, disability (mental and physical), including HIV and AIDS, marital status, medical condition (cancer and genetic characteristics), genetic information, military and veteran status, national origin (including language use restrictions), race, sex (including pregnancy, child birth, breastfeeding, and medical conditions related to pregnancy, child birth or breastfeeding), gender, gender identity and gender expression, sexual orientation, or any other protected status in accordance with all applicable federal, state and local laws.

Similarly, the company is committed to complying with all laws protecting qualified individuals with disabilities, as well as employees' religious beliefs and observances. This policy extends to all aspects of the company's employment practices, including recruiting, hiring, discipline, termination, promotions, transfers, compensation, benefits, training, leaves of absence, and other terms and conditions of employment.

Zoho Corporation will provide a reasonable accommodation for any known physical or mental disability of a qualified individual or for employees' religious beliefs and observances, provided the requested accommodation does not create an undue hardship for the company and does not pose a direct threat to the health or safety of others in the workplace or to the individual. The company will not retaliate or discriminate against a person for requesting an accommodation for his or her disability, regardless of whether the accommodation was granted.

Eligibility

This policy prohibits unlawful discrimination and harassment in the workplace and applies to applicants and employees of the company, including supervisors and managers. The company prohibits managers, supervisors and employees from discriminating against or harassing co-workers as well as customers, vendors, suppliers, independent contractors and others doing business with the company. In addition, the company prohibits customers, vendors, suppliers, independent contractors and others doing business with the company from discriminating against or harassing the company's employees.

Procedures

Examples of prohibited sexual harassment or discrimination

Sexual harassment includes a broad spectrum of conduct, including harassment based on sex, gender, gender identity or expression, and sexual orientation. Sexual harassment is defined as unwanted sexual advances or visual, verbal or physical conduct of a sexual nature. This definition includes many forms of offensive behavior and includes gender-based harassment of a person of the same sex as the harasser. The harassment does not have to be motivated by sexual desire.

Examples of unlawful and unacceptable behavior include:

1. Unwanted sexual advances.
2. Offering an employment benefit (such as a raise, promotion or career advancement) in exchange for sexual favors, or threatening an employment detriment (such as termination or demotion) for an employee's failure to engage in sexual activity.
3. Visual conduct, such as leering, making sexual gestures and displaying or posting sexually suggestive objects or pictures, cartoons or posters.
4. Verbal sexual advances, propositions, requests or comments.
5. Sending or posting sexually related messages, videos or messages via text, instant messaging or social media.
6. Verbal abuse of a sexual nature, graphic verbal comments about an individual's body, sexually degrading words used to describe an individual, and suggestive or obscene letters, notes, or invitations.
7. Physical conduct, such as touching, groping, assault or blocking movement.
8. Physical or verbal abuse concerning an individual's gender, gender identity or gender expression.
9. Verbal abuse concerning a person's characteristics such as pitch of voice, facial hair, or the size or shape of a person's body, including remarks that a male is too feminine or a woman is too masculine.

Other examples of prohibited harassment or discrimination

In addition to the above listed conduct, the company strictly prohibits harassment or discrimination concerning any other protected characteristic. Such prohibited harassment includes:

1. Racial or ethnic slurs, epithets and any other offensive remarks.
2. Jokes, whether written, verbal or electronic.
3. Threats, intimidation and other menacing behavior.
4. Inappropriate verbal, graphic or physical conduct.
5. Sending or posting harassing messages, videos or messages via text, instant messaging or social media.
6. Other harassing or discriminatory conduct based on one or more of the protected categories identified in this policy.

Harassment of the company's customers, clients, vendors, suppliers, independent contractors or employees of the company's customers, clients, vendors, suppliers or independent contractors by the company's employees is also strictly prohibited. Any such harassment will subject an employee to disciplinary action, up to and including termination. Employees who have any questions about what constitutes harassing or discriminatory conduct should contact their supervisor or human resources.

Reporting harassment or discrimination

If an employee feels that he or she is being harassed or discriminated against in violation of this policy by another employee, supervisor, manager or third party doing business with the company, the employee should immediately contact the employee's supervisor or human resources consultant at 510-693-2836. In addition, if an employee observes harassment or discrimination by another employee, supervisor, manager or nonemployee, the employee should immediately report the incident to the individuals identified above. Appropriate action will also be taken in response to violation of this policy by any nonemployee.

All supervisors must report complaints of misconduct under this policy to human resources immediately so the company can investigate and try to resolve the claim internally.

All complaints of unlawful harassment or discrimination that are reported to management or to the persons identified above will be investigated as promptly as possible, and corrective action will be taken where warranted.

All complaints of unlawful harassment or discrimination that are reported to management or to the persons identified above will be treated with as much confidentiality as possible, consistent with the need to conduct an adequate investigation. Complaints will be investigated by impartial and qualified internal personnel unless external involvement is warranted. The process will be documented and tracked for reasonable progress, and all investigations will be completely timely.

The California Department of Fair Employment and Housing (DFEH) may also investigate and process complaints of harassment or discrimination. Violators are subject to penalties and remedial measures that may include sanctions, fines, injunctions, reinstatement, back pay and damages. The toll free number from the DFEH is (800) 884-1684.

Employees' notification to the company is essential to enforcing this policy. Employees may be assured that they will not be penalized in any way for reporting a harassment or discrimination problem. It is unlawful for an employer to retaliate against employees who oppose the practices prohibited by the California Fair Employment and Housing Act (FEHA), or who file complaints or otherwise participate in an investigation, proceeding or hearing conducted by the California DFEH or the Fair Employment and Housing Commission (FEHC). Similarly, the company prohibits employees from hindering its internal investigations or its internal complaint procedure.

Violations of this policy will result in discipline

Violation of this policy will subject an employee to disciplinary action, up to and including immediate termination. In addition, under California law, employees may be held personally liable for harassing conduct that violates the FEHA.

Retaliation prohibited

Zoho Corporation prohibits retaliation against those who report, oppose or participate in an investigation of alleged violations of this policy. Participating in an investigation of alleged wrongdoing in the workplace includes:

1. Filing a complaint with a federal or state enforcement or administrative agency.
2. Participating in or cooperating with a federal or state enforcement agency that is conducting an investigation of the company regarding alleged unlawful activity.
3. Testifying as a party, witness or accused regarding alleged unlawful activity.
4. Associating with another employee who is engaged in any of these activities.
5. Making or filing an internal complaint with the company regarding alleged unlawful activity.

Providing informal notice to the company regarding alleged unlawful activity.

The company strictly prohibits any adverse action or retaliation against an employee for participating in an investigation of alleged violation of this policy. If an employee feels that he or she is being retaliated against, the employee should immediately contact their supervisor or the supervisor's supervisor OR human resources at 510-693-2836. In addition, if an employee observes retaliation by another employee, supervisor, manager or nonemployee, he or she should immediately report the incident to the individuals identified above. Any employee determined to be responsible for violating this policy will be subject to appropriate disciplinary action, up to and including termination. Moreover, any employee, supervisor or manager who condones or ignores potential violations of this policy will be subject to appropriate disciplinary action, up to and including termination.

FEHA Discrimination and Harassment Prevention and Complaint Policy Employee Acknowledgement

I have received a copy and had an opportunity to read the Discrimination and Harassment Prevention and Complaint policy attached. I understand that I may ask my supervisor or Human Resources department any questions I might have concerning this policy. I also understand that it is my responsibility to comply with this policy and any revisions made to it.

Signature of Employee

Company Representative

Employee's Name

Date

Date