

Business Responsibility and Sustainability Reporting (BRSR)- HCLTech

BRSR Statement of Director

Dear Stakeholders,

We are pleased to share our Business Responsibility and Sustainability Report ("BRSR") for the fiscal year spanning April 1, 2023, to March 31, 2024 (FY24). We have engaged DNV Business Assurance India Private Limited ("DNV") to provide independent reasonable assurance of our BRSR Core indicators and limited assurance on all the other disclosures. The assurance statement is also enclosed as part of our annual report.

At HCLTech, we consider reporting on sustainability to be a transparent way to engage with our stakeholders by sharing with them the progress we are making through our initiatives. We understand the profound impact of our actions today on the future, and thus, sustainability is not merely a concept, but a guiding principle deeply entrenched within our organizational ethos. We reaffirm our steadfast dedication to sustainability values and ethics. HCLTech has meticulously established clear and measurable objectives on our material ESG aspects, complemented by holistic strategies aimed at not just reducing the negative footprint, but expanding the positive impact. The progress of the company across the ESG dimensions is validated by the recognitions through various agencies.

- Leadership band rating by **CDP** on climate action
- Recognized among the World's Most Ethical Companies® 2024 by **Ethisphere**
- Continues to receive top ratings from prominent ESG rating agencies such as **MSCI, Sustainalytics, and S&P**.
- Five of our major campuses in India were recognized from The British Safety Council and awarded with 'International Safety Awards'

The Environmental, Social and Governance ("ESG") & Diversity, Equity and Inclusion ("DEI") committee of the board met on four occasions during FY24 to review and evaluate the performance on material aspects against our stated objectives. In alignment to the GHG emission reduction targets, the company has achieved 25% reduction on absolute emissions as compared to baseline year of FY20. Even when the employee footprint to office increased, the company has achieved reductions on water consumption and waste generation. The initiatives by the company on improving diversity among the workforce is also showing improved outcomes.

These accomplishments were possible by the methodical execution by the respective teams and adequate resource allocation and responsible direction from the leadership. A system of internal audits covering all ESG disclosures was implemented by HCLTech in response to committee recommendations, and the audit findings were reviewed by the board's Audit Committee.

Looking ahead to the forthcoming year, let us reinvigorate our commitment to HCLTech's sustainability and ESG objectives and goals. HCLTech shall persevere in its pursuit of innovation, collaboration, and exemplary conduct, demonstrating unequivocally our commitment and responsibility to collaborate with the right stakeholders towards a sustainable future.

I extend my heartfelt gratitude for your unwavering support to our collective vision of a sustainable future and gladly anticipate your feedback on the BRSR.

Robin Abrams
Chairperson – ESG & DEI Committee

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

1.	Corporate Identity Number (CIN) of the Listed Entity	L74140DL1991PLC046369
2.	Name of the Listed Entity	HCL Technologies Limited
3.	Year of incorporation	1991
4.	Registered office address	806, Siddharth, 96, Nehru Place, New Delhi - 110019, India
5.	Corporate Address	HCL Technology Hub, SEZ, Plot No. 3A, Sector 126, Noida - 201304, U.P., India
6.	E-mail	investors@hcltech.com
7.	Telephone	+91-120-4306000
8.	Website	www.hcltech.com
9.	Financial year for which reporting is being done	2023-24
10.	Name of the Stock Exchange(s) where shares are listed	National Stock Exchange of India Limited ("NSE") BSE Limited ("BSE")
11.	Paid-up capital	The paid-up equity share capital of HCL Technologies Limited as on March 31, 2024 is ₹ 542,73,30,192/- comprising of 271,36,65,096 equity shares of face value of ₹ 2/- each.
12.	Name and contact details of the person who may be contacted in case of any queries on the BRSR report	Mr. Santhosh Jayaram Global Head - Sustainability santhosh.jayaram@hcltech.com
13.	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	Disclosures made in this report are on a consolidated basis unless otherwise stated
14.	Name of assurance provider	DNV Business Assurance India Private Limited ("DNV")
15.	Type of assurance obtained	Reasonable Assurance on Core Indicators and Limited Assurance on selected other indicators.

II. Products/services

16. Details of business activities (accounting for 90% of the turnover):

S. No.	Description of the Main Activity	Description of the Business Activity	% of turnover of the entity
1	Information and Communication (Revenue from Operations)	Computer programming, consultancy, and related activities	100%

17. Products/services sold by the entity (accounting for 90% of the entity's turnover):

S. No.	Product/Service	NIC Code	% of total turnover contributed
1	IT & Business Services ("ITBS") - The ITBS business segment improves consumer and employee experiences by empowering multinational corporations to conduct business transformation in an agile and sustainable way. It makes up the largest component of HCLTech's total revenue mix consisting of 4 segments: Digital Business Services, Digital Foundation Services, Digital Process Operations and EdTech Business Services	Services are broadly mapped to NIC classes 620 and 631	72.95%
2	Engineering and R&D Services ("ERS") - Engineering services and solutions in all aspects of product development and platform engineering.		16.56%
3	HCL Software - Provision of modernized software products to global clients for their technological and industry-specific requirements.		10.49%
	Total		100.00%

III. Operations

18. Number of locations where plants and/or operations/offices of the entity are situated:

Location	Number of Plants	Number of offices	Total
National	Not Applicable	53	53
International	Not Applicable	226	226

19. Markets served by entity

a. Number of locations

Locations	Number
National (No. of states)	12
International (No. of countries)	54

b. What is the contribution of exports as a percentage of the total turnover of the entity?

What is the contribution of exports as a percentage of the total turnover of the entity?	93%
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Note: This is for HCL Technologies Ltd. (Standalone Entity)

c. A brief on types of customers

HCLTech focuses on empowering people through digital transformation and technological advancements. It targets G2000 enterprises, including private and government-owned entities as its potential clients, and provides digital solutions to a vast client universe spanning across various industries and sectors. The company provides digital automation and technological innovation solutions for traditional banking firms. The company serves leading life sciences and healthcare companies, including 10 of the top 20 pharmaceutical companies and seven leading medical device firms. In the public services sector, the company caters to a wide array of clients including energy companies, mining and natural resource firms, oil and gas ventures, travel and transport, logistics, and hospitality. In consumer services, HCLTech serves clients in retail, media, entertainment, and telecom sectors, and serves various manufacturing industry sectors such as aerospace, defense, automotive sectors.

IV. Employees

20. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female		Others	
			No. (B)	% (B / A)	No. (C)	% (C / A)	No. (C)	% (C / A)
Employees								
1.	Permanent (D)	227,481	160,982	70.77%	66,268	29.13%	231	0.10%
2.	Other than permanent (E)	9,767	7,437	76.14%	2,238	22.91%	92	0.94%
	Total employees (D + E)	237,248	168,419	70.99%	68,506	28.88%	323	0.14%

Notes:

Disclosing gender is voluntary for HCLTech employees. The employees who have not disclosed their gender are categorized as 'Others'.

The entire workforce of HCLTech is categorized as 'Employees' and none as 'Workers'. Therefore, the information required in all sections in the 'Workers' category is not applicable to HCLTech.

b. Differently abled employees and workers

S. No	Particulars	Total (A)	Male		Female		Others	
			No. (B)	% (B / A)	No.(C)	% (C / A)	No. (C)	% (C / A)
Differently abled employees								
1.	Permanent (D)	736	541	73%	191	26%	4	1%
2.	Other than permanent (E)	5	3	60%	2	40%	0	0%
	Total differently abled employees (D + E)	741	544	73%	193	26%	4	1%

21. Participation/ inclusion/ representation of women

Particulars	Total (A)	No. and % of females	
		No. (B)	% (B / A)
Board of Directors	14	5	35.71
Key Management Personnel	3	0	0

22. Turnover rate for permanent employees

	FY 2023-24 (Turnover rate in current FY)				FY 2022-23 (Turnover rate in previous FY)				FY 2021-22 (Turnover rate in the year prior to the previous FY)			
	Male	Female	Others	Total	Male	Female	Others	Total	Male	Female	Others	Total
Permanent Employees	12.32%	12.72%	7.71%	12.42%	19.83%	18.60%	15.67%	19.50%	21.87%	22.05%	31.67%	21.92%

Notes:

Attrition data provided by HCLTech is voluntary attrition % (LTM – IT Services)

Disclosing gender is voluntary for HCLTech employees. The employees who have not disclosed their gender are categorized as 'Others'.

V. Holding, subsidiary, and associate companies (including joint ventures)

23. (a) Names of holding / subsidiary / associate companies / joint ventures

Details of Holding, Subsidiary and Associate Companies (including joint ventures) are provided in Directors' Report, which forms part of the Annual Report.

All the entities indicated participate in the preparation of BRSR of the listed entity.

VI. CSR details

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013 – Yes
(ii) Turnover (in Crores) – ₹ 48,118 (as per Standalone financial statements)
(iii) Net worth (in Crores) – ₹ 39,480 (as per Standalone financial statements)

VII. Transparency and disclosures compliances

25. Complaints/grievances on any of the principles (principles 1 to 9) under the National Guidelines on Responsible Business Conduct (NGBRC):

Stakeholder group from whom the complaint is received	Grievance Redressal Mechanism in Place (Yes/No) If Yes, then provide web-link for grievance redress policy	FY 2023-24			FY 2022-23		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Re-remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Re-remarks
Community / Non-Governmental Organizations (NGOs)/ Government Authorities/ Project Staff from the CSR	Yes https://www.hcltech.com/corporate/corporate-social-responsibility-policy	0	0	Nil	0	0	Nil
Investors (other than Shareholders)	Yes https://www.hcltech.com/investor-relations/investor-faq	0	0	Nil	0	0	Nil
Shareholders	Yes https://www.hcltech.com/investor-relations/investor-faq	15	0	Nil	20	0	Nil
Employees and Workers	Yes https://www.hcltech.com/corporate/grievance-redressal-protocol https://www.hcltech.com/corporate/human-rights-policy https://www.hcltech.com/corporate/whistleblower-policy	30	17	Nil	53	32	Nil

Stakeholder group from whom the complaint is received	Grievance Redressal Mechanism in Place (Yes/No) If Yes, then provide web-link for grievance redress policy	FY 2023-24			FY 2022-23		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Re-remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Re-remarks
Customers	https://www.hcltech.com/corporate/whistleblower-policy	3	2	Nil	1	0	Nil
Value chain partners	Yes https://www.hcltech.com/corporate/supplier-code-conduct https://www.hcltech.com/corporate/whistleblower-policy	1	1	Nil	Nil	Nil	Nil
Others- (Anonymous Complaints)	Yes https://www.hcltech.com/corporate/grievance-redressal-protocol	50	32	Nil	66	27	Nil

Note: During FY 2022-23, 54 whistleblower complaints have been filed by employees. Additionally, 66 anonymous complaints were also received. During FY 2023-24, 30 whistleblower complaints have been filed by employees. Additionally, 50 anonymous complaints were also received.

26. Overview of the entity's material responsible business conduct issues.

Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk along-with its financial implications, as per the following format:

Details of Company's material issues and associated risks and opportunities is available in Sustainability Report 2024, Section 'Stakeholder Engagement'.

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies, and processes put in place towards adopting the NGRBC principles and core elements.

Disclosure questions	P1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Policy and management processes									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
c. Web-link of the policies, if available.	P1: Code of Business Ethics and Conduct: https://www.hcltech.com/corporate/code-of-business-ethics-and-conduct-codec Anti-Bribery & Anti-Corruption policy: https://www.hcltech.com/corporate/anti-bribery-and-anti-corruption-policy-abac Whistleblower Policy: https://www.hcltech.com/investors/governance-policies/whistleblowerpolicypdf HCL Group Tax Strategy: https://www.hcltech.com/sites/default/files/HCLGroupTaxStrategyFY22.pdf								

c. Web-link of the policies, if available.	<p>P2: Supplier Code of Conduct: https://www.hcltech.com/corporate/supplier-code-conduct</p> <p>Code of Business Ethics and Conduct: https://www.hcltech.com/corporate/code-of-business-ethics-and-conduct-codec</p> <p>Environmental Sustainability Policy: https://www.hcltech.com/sites/default/files/documents/sustainability/EMS-Policy-2022.pdf</p> <p>Occupational Health & Safety Policy: https://www.hcltech.com/sites/default/files/documents/sustainability/OHS-Policy-2022.pdf</p>
	<p>P3: Supplier Code of Conduct: https://www.hcltech.com/corporate/supplier-code-conduct</p> <p>Code of Business Ethics and Conduct: https://www.hcltech.com/corporate/code-of-business-ethics-and-conduct-codec</p> <p>Occupational Health & Safety Policy: https://www.hcltech.com/sites/default/files/documents/sustainability/OHS-Policy-2022.pdf</p> <p>Whistleblower Policy: https://www.hcltech.com/investors/governance-policies/whistleblowerpolicypdf</p> <p>Remuneration Policy: https://www.hcltech.com/investors/governance-policies/rempolicypdf</p> <p>HCL Group Tax Strategy: https://www.hcltech.com/sites/default/files/HCLGroupTaxStrategyFY22.pdf</p> <p>Human Rights Policy: https://www.hcltech.com/sites/default/files/documents/inline-migration/human-rights-policy.pdf</p>
	<p>P4: Dividend Distribution Policy: https://www.hcltech.com/sites/default/files/dividend_distribution_policy.pdf</p> <p>Policy for determination of materiality of event or information: https://www.hcltech.com/investors/governance-policies/determinationofmaterialityofeventspolicypdf</p> <p>Related Party Policy: https://www.hcltech.com/investors/governance-policies/rptpolicypdf</p> <p>Fair Disclosure Code: https://www.hcltech.com/investors/governance-policies/fair-disclosure-codepdf</p> <p>Code of Business Ethics and Conduct: https://www.hcltech.com/corporate/code-of-business-ethics-and-conduct-codec</p> <p>Whistleblower Policy: https://www.hcltech.com/investors/governance-policies/whistleblowerpolicypdf</p>
	<p>P5: Human Rights Policy: https://www.hcltech.com/sites/default/files/documents/inline-migration/human-rights-policy.pdf</p> <p>Code of Business Ethics and Conduct: https://www.hcltech.com/corporate/code-of-business-ethics-and-conduct-codec</p>
	<p>P6: Environmental and Sustainability Policy: https://www.hcltech.com/sites/default/files/document/open/EMSPolicy-2023.pdf</p> <p>Energy Policy: https://www.hcltech.com/sites/default/files/documents/sustainability/EnMS-Policy-2022.pdf</p> <p>Occupational Health & Safety Policy: https://www.hcltech.com/sites/default/files/documents/sustainability/OHS-Policy-2022.pdf</p> <p>Supplier Code of Conduct: https://www.hcltech.com/corporate/supplier-code-conduct</p>

	<p>P7: Code of Business Ethics and Conduct: https://www.hcltech.com/investors/governance-policies/cobecpdf</p> <p>Anti-Bribery & Anti-Corruption policy: https://www.hcltech.com/investors/governance-policies/abacpdf</p> <p>P8: CSR Policy: https://www.hcltech.com/investors/governance-policies/csrapolicypdf</p> <p>Supplier Code of Conduct: https://www.hcltech.com/corporate/supplier-code-conduct</p> <p>P9: Code of Business Ethics and Conduct: https://www.hcltech.com/corporate/code-of-business-ethics-and-conduct-codec</p> <p>Anti-Bribery & Anti-Corruption policy: https://www.hcltech.com/corporate/anti-bribery-and-anti-corruption-policy-abac</p> <p>Privacy Statement: https://www.hcltech.com/privacy-statement</p> <p>Privacy Trust Center: https://www.hcltech.com/privacy-trust-center</p>																										
2. Whether the entity has translated the policy into procedures (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes																		
3. Do the enlisted policies extend to your value chain partners? (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes																		
4. Name of the national and international codes / certifications / labels / standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) mapped to each principle	<table border="1"> <tr> <td data-bbox="432 961 665 1076">Principle 1:</td> <td data-bbox="665 961 1479 1076">ISO 37001:2022 Ethisphere recognizes HCLTech amongst 2024 World's Most Ethical Companies®</td> </tr> <tr> <td data-bbox="432 1076 665 1163">Principle 2:</td> <td data-bbox="665 1076 1479 1163">ISO 14001:2015 ISO 50001:2018 ISO 9001:2015</td> </tr> <tr> <td data-bbox="432 1163 665 1405">Principle 3:</td> <td data-bbox="665 1163 1479 1405">ISO 37001:2022 ISO 45001:2018 ISO 14001:2015 ISO 14064-1:2018 and 14064-3:2019 ISO 50001:2018 ISO 9001:2015 ABMS ISO 37001-2016 LEED Certification Great Place to Work</td> </tr> <tr> <td data-bbox="432 1405 665 1439">Principle 4:</td> <td data-bbox="665 1405 1479 1439">ISO 9001:2015</td> </tr> <tr> <td data-bbox="432 1439 665 1550">Principle 5:</td> <td data-bbox="665 1439 1479 1550">Signatory to UNGC Founding Member-WEF's Global Parity Alliance on DE&I Certified as a Global Top Employer Included in the Bloomberg Gender-Equality Index ("GEI")</td> </tr> <tr> <td data-bbox="432 1550 665 1768">Principle 6:</td> <td data-bbox="665 1550 1479 1768">ISO 37001:2022 ISO 45001:2018 ISO 14001:2015 ISO 50001:2018 ISO 9001:2015 ABMS ISO 37001-2016 LEED Certification ISO 14064-1:2018 and 14064-3:2019</td> </tr> <tr> <td data-bbox="432 1768 665 1830">Principle 7:</td> <td data-bbox="665 1768 1479 1830">Signatory to UNGC ISO 37001-2016</td> </tr> <tr> <td data-bbox="432 1830 665 1893">Principle 8:</td> <td data-bbox="665 1830 1479 1893">HCL Foundation felicitated by UP government for its impactful work in the state at UPGIS (Feb)</td> </tr> <tr> <td data-bbox="432 1893 665 1923">Principle 9:</td> <td data-bbox="665 1893 1479 1923">ISO 27001:2013</td> </tr> </table>									Principle 1:	ISO 37001:2022 Ethisphere recognizes HCLTech amongst 2024 World's Most Ethical Companies®	Principle 2:	ISO 14001:2015 ISO 50001:2018 ISO 9001:2015	Principle 3:	ISO 37001:2022 ISO 45001:2018 ISO 14001:2015 ISO 14064-1:2018 and 14064-3:2019 ISO 50001:2018 ISO 9001:2015 ABMS ISO 37001-2016 LEED Certification Great Place to Work	Principle 4:	ISO 9001:2015	Principle 5:	Signatory to UNGC Founding Member-WEF's Global Parity Alliance on DE&I Certified as a Global Top Employer Included in the Bloomberg Gender-Equality Index ("GEI")	Principle 6:	ISO 37001:2022 ISO 45001:2018 ISO 14001:2015 ISO 50001:2018 ISO 9001:2015 ABMS ISO 37001-2016 LEED Certification ISO 14064-1:2018 and 14064-3:2019	Principle 7:	Signatory to UNGC ISO 37001-2016	Principle 8:	HCL Foundation felicitated by UP government for its impactful work in the state at UPGIS (Feb)	Principle 9:	ISO 27001:2013
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5. Specific commitments, goals and targets set by the entity with defined timelines, if any	<ul style="list-style-type: none"> (a) Improving the ESG Knowledge and Skills of the employees. (b) Improving the gender diversity in workforce with 40% Women by 2030. (c) Increase gender representation in senior leadership levels to 30% by 2030. (d) Being recognized among the best employers in our key operating geographies. (e) Achieve Net Zero by 2040. (f) 50% reduction in absolute Scope 1 and 2 emissions by FY30 from baseline year of FY20. (g) 80% of electricity usage to be from renewable energy by 2030. (h) 42% reduction in absolute Scope 3 emission by FY30 from baseline year of FY20. (i) Maintain Zero Discharge from all owned facilities. (j) Achieve zero waste to landfill at all owned facilities by FY25. (k) Strengthening the sustainable supply chain process. (l) Being recognized among industry leaders for information security practices and data privacy standards.
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met	<p>Details on performance against the Company commitments are available in the Sustainability Report 2024.</p>
Governance, leadership, and oversight	
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure) <p>The Statement is available at the beginning of the BRSR section.</p>	
8. Details of the highest authority responsible for implementation and oversight of the business responsibility policy/policies	<p>The highest executive authority responsible for the implementation of the policies is the CEO & Managing Director – Mr. C. Vijayakumar.</p>
9. Does the entity have a specified committee of the Board/ Director responsible for decision-making on sustainability-related issues? (Yes / No). If yes, provide details.	<p>Yes, the Company has an ESG & DEI Committee of the Board. The members of the ESG & DEI Committee are:</p> <ul style="list-style-type: none"> • Ms. Robin Ann Abrams (DIN 00030840) Independent Director Chairperson of the Committee • Ms. Roshni Nadar Malhotra (DIN 02346621) Non-Independent Director Chairperson of HCL Technologies Limited • Mr. Simon John England (DIN 08664595) Independent Director <p>Mr. C. Vijayakumar, CEO & Managing Director, is an invitee to this Committee.</p>

10. Details of review of NGRBCs by the company:

Subject for review	Indicate whether the review was undertaken by Director/ committee of the board/ any other committee
Performance against above policies and follow up action	<p>Yes, the ESG & DEI Committee reviews the performance.</p>
Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)	<p>Quarterly</p>
Compliance with statutory requirements of relevance to the principles, and the rectification of any non-compliances	<p>Yes</p>
Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)	<p>Quarterly</p>

<p>11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide the name of the agency.</p>	<p>Yes,</p> <ul style="list-style-type: none"> • Reasonable Assurance of BRSR (core indicators) and Limited Assurance of BRSR (non-core and Sustainability Report: DNV) • External ISO 37001-2016 certification annual audit by BSI • Gap Assessment SA 8000: Bureau Veritas • Global Top Employer Assessment: Top Employers Institute • External ISO 14001 annual audit by BSI Management Systems • External ISO 45001 annual audit by BSI Management Systems • Independent assessment on Human Rights policies by Bureau Veritas • External ISO 27001 annual audit by Bureau Veritas • External ISO 27701 annual audit by Bureau Veritas • External ISO 22301 annual audit by Bureau Veritas • External SOC 2 attestation by Grant Thornton • Cyber Essential Plus by Sophlee Limited • Pricewaterhouse Coopers (PwC): Impact assessment of CSR projects • All HCLTech campuses LEED “Platinum” certified by USGBC or IGBC. <p>In addition, our policies undergo regular evaluation. For instance, HCLTech’s Business Gift and Entertainment Policy (“BGEF”) and Anti-Money Laundering Policy (“AML”) were reviewed by DLA Piper to be in line with current industry standards. HCLTech’s procurement policy was reviewed by PwC to ensure integration of sustainability related aspects.</p>
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12. If answer to question (1) above is “No” i.e., not all principles are covered by a policy, reasons to be stated: Not Applicable

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as “Essential” and “Leadership”. While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally, and ethically responsible.

PRINCIPLE 1: Businesses should conduct and govern themselves with integrity, and in a manner that is ethical, transparent, and accountable.

Essential Indicators

1. Percentage coverage by training and awareness programmes on any of the principles during the financial year:

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	% of persons in respective category covered by the awareness programmes
Board of directors	1	1. Global Regulator Expectations for Compliance 2. US: ABAC and AML Enforcement Trends 3. India: ABAC and AML Enforcement Trends 4. UK and EU: ABAC and AML Enforcement Trends 5. Best Practices to Mitigate Risk	100%
Key managerial personnel	1	1. Making ethical decisions. 2. Your ethical leadership capabilities 3. Cash, gifts, and entertainment risks 4. Building a speak-up culture 5. Responding to employee concerns 6. What matters to you 7. Tell us how you feel	100%
Employees other than BoD and KMPs	5	1. Business ethics 2. What is workplace conduct 3. What is fraud 4. What Are Bribery and Corruption? 5. Cash, gifts and entertainment risks 6. Conflict of Interest 7. What is money laundering 8. Anti-trust 9. Speaking up	94%

Above table covers only mandatory trainings.

2. **Details of fines/penalties/punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/judicial institutions in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and as disclosed on the entity's website):**

Nil

3. **Of the instances disclosed in Question 2 above, details of the Appeal/ Revision are preferred in cases where monetary or non-monetary action has been appealed.**

Not Applicable

4. **Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web link to the policy.**

Yes, HCLTech has a Code of Business Ethics and Conduct ("COBEC"), Anti-Bribery & Anti-Corruption policy ("ABAC") in place. The policies and codes apply to all individuals working worldwide for all affiliates and subsidiaries of HCLTech at all levels and grades. It covers giving and offering of bribes, and bribing of government officials, facilitation payments, charitable donation, political activities. Foreign Corrupt Practices Act ("FCPA") & UK Bribery Act ("UKBA") are the governing legislations of this policy. The Anti-Bribery & Anti-Corruption ("ABAC") policy can be accessed on the company's website through this <https://www.hcltech.com/corporate/anti-bribery-and-anti-corruption-policy-abac>.

HCLTech has also obtained ISO 37001-2016 certification for its Anti-Bribery Management Systems (or "ABMS"), which combat corruption and bribery. The certificate may be accessed through this link: <https://hcltech.com/corporate-certifications> The company also conducts ABMS Quarterly Compliance Certification ("QCC"), allowing for the disclosure of different tasks that occurred during the previous quarter.

Furthermore, the Company also offers a channel: whistleblower@hcltech.com and Global Ethics Helpline reporting system for employees based in Germany and the Netherlands to raise and report their concerns, which also ensures confidentiality. The company is subject to yearly internal and external audits carried out by other organizations for anti-bribery and anti-corruption.

5. **Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption.**

	FY 2023-24	FY 2022-23
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Nil	Nil

6. **Details of complaints with regard to conflict of interest:**

	FY 2023-24		FY 2022-23	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of conflict of interest of the directors	Nil	Not Applicable	Nil	Not Applicable
Number of complaints received in relation to issues of conflict of interest of the KMP's	Nil	Not Applicable	Nil	Not Applicable

7. **Provide details of any corrective action taken or underway on issues related to fines/penalties/action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest.**

Not applicable, since there were no issues related to fines / penalties /action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest at HCL Tech.

8. **Number of days of accounts payable (Accounts payable *365/Cost of goods/services procured) In the following format.**

	FY 2023-24	FY 2022-23
Number of Days of account Payable	40.4	39.2

Note: Computed excluding provisions

9. Open-ness of Business

Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along with loans and advances and investment, with related parties, in the following format:

Parameters	Metrics	FY 2023-24	FY 2022-23
Concentration of purchase	a) Purchase from trading houses as % of total purchase	Not Applicable	Not Applicable
	b) Number of trading houses where purchases are made from	Not Applicable	Not Applicable
	c) Purchases from top 10 trading houses as % of total purchase from trading houses	Not Applicable	Not Applicable
Concentrations of sales	a) Sales to dealers/ distributors as % of total sales	4.03%	3.97%
	b) Number of dealers/distributors to whom sales are made	1,635	1,762
	c) Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	28.27%	27.84%
Share of RPTs in	a) Purchases (purchases with related parties/total purchase)	0.14%	0.13%
	b) Sales (Sales to related parties/total sales)	0.02%	0.00%
	c) Loans and advances (Loans and advances with related parties/total Loans and advances)	0.00%	0.00%
	d) Investments (Investments to related parties/total Investments made)	0.00%	0.00%

Leadership Indicators

1. Awareness programmes conducted for value chain partners on any of the principles during the financial year:

Total number of awareness programmes held	Topics/principles covered under the training	% of value chain partners covered (by value of business done with such partners) under the awareness programmes
1,293	Topics covered includes risk assessment & work permit system awareness, awareness on electrical safety, LOTO (Lockout-Tagout) system, energy consumption & conservation, chemical safety & MSDS awareness, fire safety, emergency preparedness & evacuation procedure awareness, awareness on incident reporting & management, awareness on QHSEE Policy- objectives & targets, awareness on Legal compliances, awareness on power tools safety, PPE & its Importance, waste management, working at height, slip-trip- fall & ergonomics awareness, confined space & lone working awareness, safe driving / road safety, energy conservation, environmental impacts.	100% of high risk value chain partners are covered.

2. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/No) If yes, provide details of the same.

Yes. The Company receives from the members of the Board, a list of entities in which they are interested, at the beginning of every financial year and as and when there is any change in such interest. It is ensured that the requisite approvals as required under the statute as well as the Company's policies are in place before transacting with such entities. Further, the Company has adopted the Code of Business Ethics and Conduct which requires that the Directors of the Company shall avoid any activity or association that creates or appears to create a conflict between the personal interests of the Directors and the business interests of the Company.

PRINCIPLE 2: Businesses should provide goods and services in a manner that is sustainable and safe.

Essential Indicators

1. Percentage of R&D and capital expenditure (CAPEX) investments in specific technologies to improve product and processes' environmental and social impacts to total R&D and capex investments made by the entity, respectively.

	FY 2023-24 (₹ in Crore)	FY 2022-23 (₹ in Crore)	Details of improvements in environmental and social impacts
R&D	(1,651) 100%	(1,632) 100%	R&D investments are made to enhance the effectiveness of our products and services, as well as to develop new ones. Upgrading legacy codes improves performance efficiency, resulting in environmental benefits. Additionally, we strive to improve our products to provide better security and privacy.
Capex	(1,048) 100%	(1,661) 100%	Our capex primarily focusses on infrastructure, which improves our energy efficiency and accessibility through better equipment and buildings.

2. a) Does the entity have procedures in place for sustainable sourcing? (Yes/No)

Yes

HCLTech offers a supplier onboarding approach that is based on sustainability. The company does have a sustainability due-diligence process while onboarding new vendors. The company also have a sustainability risk assessment conducted annually on every category of purchase. Based on the risk criteria, the company has also started a supplier assessment on sustainability parameters and a feedback programme to improve awareness and sustainability performance of vendors.

b) If yes, what percentage of inputs were sourced sustainably?

The company has implemented a robust procedure to onboard suppliers based on sustainability parameters, ensuring that all new vendors undergo HCLTech’s comprehensive Vendor Due Diligence process, which includes sustainability considerations. Additionally, HCLTech has initiated supply chain sustainability risk assessments and is conducting sustainability evaluations of selected vendors. As a result, our sustainable sourcing program now encompasses 100% of the company’s suppliers.

3. Describe the processes in place to safely reclaim your products for reusing, recycling, and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.

Not Applicable to HCLTech as the Company does not engage in any product manufacturing activities.

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity’s activities (Yes / No). If yes, whether the waste collection plan is in line with the EPR plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

Not Applicable to HCLTech as the Company does not engage in any product manufacturing activities.

Leadership Indicators

1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?

NIC Code	Name of product / service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by an independent external agency (Yes/No)	Results communicated in the public domain (Yes/No) If yes, provide the web-link.
Not Applicable to HCLTech as the Company does not engage in any product manufacturing activities.					

2. If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products/services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.

Name of product / service	Description of the risk/concern	Action taken
Not Applicable to HCLTech as the Company does not engage in any product manufacturing activities.		

3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).

Indicate input material	Recycled or reused input material to total material	
	FY 2023-24	FY 2022-23
Not Applicable to HCLTech as the Company does not engage in any product manufacturing activities.		

4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed of.

Not Applicable to HCLTech as the Company does not engage in any product manufacturing activities.

5. Reclaimed products and their packaging materials (as a percentage of products sold) for each product category.

Not Applicable to HCLTech as the Company does not engage in any product manufacturing activities.

PRINCIPLE 3: Businesses should respect and promote the well-being of all employees, including those in their value chains.

Essential Indicators

1. a. Details of measures for the well-being of employees.

Category	% of employees covered by										
	Total (A)	Health insurance*		Accident insurance		Maternity benefits		Paternity benefits		Day care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
Permanent employees											
Male	160,982	160,982	100%	160,982	100%	NA	NA	160,982	100%	-	-
Female	66,268	66,268	100%	66,268	100%	66,268	100%	NA	NA	-	-
Others	231	231	100%	231	100%	NA	NA	NA	NA	-	-
Total	227,481	227,481	100%	227,481	100%	66,268	100%	160,982	100%	-	-

Note: * Health insurance includes ESIC coverage

We provide onsite, proximity and network childcare support options for our employees in India, based on their preference.

C. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format:

	FY 2023-24	FY 2022-23
Cost incurred on well-being measures as a % of total revenue of the company.	1.93%	1.62%

The table presents cumulative percentage of country-specific expenditures associated with employee insurance, including life, health, and other insurance, as well as the amounts spent for employee health checkups.

2. Details of retirement benefits for Current Financial Year and Previous Financial Year

Benefits	FY 2023-24			FY 2022-23		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100%	NA	Y	100%	NA	Y
Gratuity	100%	NA	Y	100%	NA	Y
ESI	9.06%	NA	Y	10.88%	NA	Y
Others – please specify	-	-	-	-	-	-

Note: India employee headcount has been considered for the table above.

3. Accessibility of workplaces

Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

People with disabilities (PwDs) are integral to HCLTech's workforce, and the firm is always working towards providing them with an inclusive and accessible workplace through the four principles of Employ, Enable, Engage, and Empower (4Es). HCLTech has taken several steps to ensure accessibility for all employees with disabilities by developing well-equipped and disability-friendly infrastructure such as ramps, voice-enabled lifts, PWD washrooms, reserved parking spaces, and emergency warning systems with audio and visual alarms. The organization has also conducted third-party inspections to ensure that its facilities are accessible to employees with disabilities. Furthermore, the Company's websites and internal portals comply with the Web Content Accessibility Guidelines (WCAG), and the Company regularly updates its portals to make them more accessible.

4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web link to the policy.

Yes, the Company has an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016 and is available on the website of the Company at <https://www.hcltech.com/geo-presence/india#overview>.

5. Return to work and Retention rates of permanent employees and workers that took parental leave.

Gender	Permanent employees	
	Return to work rate	Retention rate
Male	99.97%	77.64%
Female	99.67%	65.65%
Total	99.80%	73.97%

6. Is there a mechanism available to receive and redress grievances for the following categories of employees and workers? If yes, give details of the mechanism in brief.

	(If Yes, then give details of the mechanism in brief)
Permanent employees	Yes. HCL has a multi-tiered grievance handling mechanism applicable to all permanent and non-permanent employees including, dedicated channels for addressing harassment, whistle-blower complaints, security incidents, discrimination, general grievances, etc. Employees can raise concerns by submitting their grievance in the Global Ethics Helpline (MyHCLTech >>Top Ribbon (Main Menu)>> Ethics Helpline).
Other than permanent employees	

Note: The entire workforce of HCLTech is categorized as 'Employees' and none as 'Workers'. Therefore, the information required in all sections in the 'Workers' category is not applicable to HCLTech.

7. Membership of employees and workers in association(s) or Unions recognized by the listed entity:

Category	FY 2023-24			FY 2022-23		
	Total employees workers in the respective category (A)	No. of employees/workers in the respective category, who are part of the association(s) or Union (B)	% (B/A)	Total employees/workers in the respective category (C)	No. of employees/workers in the respective category, who are part of the association(s) or Union (D)	% (D/C)
Total permanent employees	227,481	9,124	4.01%	225,944	9,120	4.04%
Male	160,982	6,440	4.00%	159,842	6,357	3.98%
Female	66,268	2,684	4.05%	65,907	2,763	4.19%
Others	231	-	-	195	-	-

Note : We have changed the reporting definition this year to cover all employees in countries where we have recognized Unions/Workers councils

8. Details of training given to employees and workers:

Category	FY 2023-24					FY 2022-23				
	Total (A)	On Health and safety measures		On skill upgradation		Total (D)	On Health and safety measures		On skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	160,982	28,226	17.5%	148,524	92.3%	159,842	10,238	6.4%	124,462	77.9%
Female	66,268	10,205	15.4%	62,610	94.5%	65,907	4,228	6.4%	52,947	80.3%
Others	231	49	21.2%	78	33.8%	195	13	6.6%	33	16.9%
Total	227,481	38,480	16.92%	211,212	92.8%	225,944	14,481	6.4%	177,442	78.5%

Note: In this table we have considered training for FTE employees active as on March 31, 2024 and March 31, 2023 respectively.

9. Details of performance and career development reviews of employees and workers:

Category	FY 2023-24			FY 2022-23		
	Total (A)*	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees						
Male	152,116	152,116	100%	100% of eligible employees have received performance and career development review.		
Female	62,381	62,381	100%			
Others	63	63	100%			
Total	214,560	214,560	100%			

Note: * - Eligible employees

10. Health and safety management system:

a) Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, what is the coverage of such a system?

Yes, while 100% of HCLTech employees are covered under the OH&S Policies and procedures, facilities covering 70% of HCLTech employees are certified against ISO 45001:2018.

b) What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?

The Company has established, implemented, and maintained a formal process for hazard identification, risk assessment and control to effectively manage workplace and safety hazards across our facilities. HCLTech uses the Failure Mode Effect Analysis ("FMEA") to identify work-related hazards and assess risks on a routine and non-routine basis.

c) Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks (Yes/No)

Yes

d) Do the employees/ workers of the entity have access to non-occupational medical and healthcare services? (Yes/No)

Yes

11. Details of safety related incidents, in the following format:

Safety incident/number	Category	FY 2023-24	FY 2022-23
Lost Time Injury Frequency Rate (LTIFR) (per one-million-person hour worked)	Employees	0.008639	The Company is continuously looking to strengthen the monitoring systems in place and will start reporting on this data point in future.
Total recordable work-related injuries	Employees	27	5
No. of fatalities	Employees	0	0
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0

12. Describe the measures taken by the entity to ensure a safe and healthy workplace.

The company has taken the following measures to maintain a safe and healthy workplace:

1. Ensure compliance to Health & Safety laws and provide necessary support to our employees.
2. Training of employees on Occupational Health & Safety.
3. Periodic Inspection & audits to check the compliance level set against our internal benchmarks.
4. Provision of Personal Protective Equipment to employees wherever needed.
5. HCLTech sites are certified under the OHS management system against ISO 45001:2018 standard.
6. Increased the OHS certification (ISO 45001:2018) coverage from 65% during the last year to 70% in the current year.
7. Undertook evaluation for five of our campuses under the International Safety Awards hosted by the British Safety Council.

In addition to these efforts, HCL Healthcare focuses on offering managed healthcare solutions to employees and their families. These services include lab services, virtual specialist doctor consultations, eye care solutions, and dentistry services. The clinics are built to international standards and are dedicated to offering a wide variety of health care services to employees and their families.

The Company has the essential mechanisms in place to protect employees' safety, and they are encouraged to share any workplace risks or health concerns. The company has safety committees that convene at regular intervals. There is a safety incident reporting and management mechanism in place to guarantee that all work-related occurrences are reported and resolved through appropriate corrective actions.

13. Number of complaints on the following made by employees and workers

	FY 2023-24			FY 2022-23		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working conditions	9	0	-	14	1	-
Health & safety	9	2	-	5	0	-

14. Assessments for the year

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	100%
Working conditions	100%

15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks/concerns arising from assessments of health & safety practices and working conditions.

The Company has taken the below mentioned steps as response to incidents or suggestions:

- All the entry/exits of the major campuses have been modernized to enable smooth entry/exits of PWDs (People with Disability).
- One dedicated tank installed in STP for the Eye wash shower- Chennai Campus.
- Rescue Stick: Rescue stick was made up of Non- Conducting material (UPVC material) by inhouse team -ELCOT Madurai.
- Ambulance gate control : Ambulance entry/exit is automated with a RFID/ push button opening , when it arrives near to the gate -3, the security will have a push button to open - ELCOT Madurai.
- Infinity walk : Created infinity walk without any investment for physical activity - Madurai.
- Evacuation chair : Procured 3 no's evacuation chair, placed at all towers for specially abled persons- Chennai Campus.
- Confined space Tripod System introduced to provide a stable overhead anchorage for confined space entry and emergency rescue applications -Jigani Campus.
- All HIRA ,EAIA ,R&O are revisited and updated till Feb-23 in Pan India facility .
- 33 Nos. High volume low speed HVLS fans has been installed in New cafeteria at Chennai campus.
- 5 Nos. Hear Recovery Wheel ("HRW") rectified to ensure 100% safe air supply -Jigani Campus.
- Light sensor fixed in stair case to provide adequate lighting from 6 PM to 7 AM - Jigani Campus.

Leadership Indicators

1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N)

Yes, covering all the employees of the Company.

2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.

At HCLTech, all legal compliances are reviewed as part of our vendor audits.

3. Provide the number of employees/workers having suffered high consequence work-related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2023-24	FY 2022-23	FY 2023-24	FY 2022-23
Employees	0	0	0	0

4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/ No)

Yes

5. Details on assessment of value chain partners

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety conditions	100% of the major value chain partners engaged in facility management are covered.
Working conditions	100% of the major value chain partners engaged in facility management are covered.

6. Provide details of any corrective actions taken or underway to address significant risks/concerns arising from assessments of health and safety practices and working conditions of value chain partners.

The company has proactively implemented a range of corrective measures to address various risks identified during comprehensive assessments of health and safety procedures and working conditions for its our value chain partners. These measures encompass a wide scope of initiatives, including the meticulous repair of phase-3 occupancy sensors in Noida, the strategic partitioning of servers/mix rooms to optimize energy efficiency, the installation of advanced motion sensors in restrooms, the implementation of a

cutting-edge cool roof with high Solar Reflectance Index ("SRI") coating in terrace areas, the translation of Quality, Health, Safety, Environment, and Energy ("QHSEE") policy into local languages, and the provision of thorough first aid training to our Integrated Facilities Management Services ("IFMS") staff with support from, M/s. Usha Fire Safety.

PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its stakeholders.

Essential Indicators

1. Describe the processes for identifying key stakeholder groups of the entity.

HCLTech's stakeholder engagement process focusses on identifying and prioritizing key stakeholders based on their relevance, role, and impact. Following this, tailored engagement strategies are developed. The outcomes of these engagements are then effectively communicated within the company to ensure that stakeholders receive the necessary feedback or resolution. Internal stakeholders include employees, senior leaders, managers, the Board of Directors, and HCL Foundation members. External stakeholders consist of consumers, investors, regulatory authorities, suppliers, service providers, and the media. The stakeholder engagement process has helped the company align its Environmental, Social, and Governance ("ESG") emphasis areas with its fundamental concept of Act, Pact, and Impact. Stakeholder participation is crucial to HCLTech's ESG approach. Stakeholder engagement at HCLTech is an ongoing process that enables the company to understand and meet the expectations of its stakeholders.

2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

Details of stakeholder engagement are available in Sustainability Report (Section 'Stakeholder Engagement').

Leadership Indicators

1. Provide the processes for consultation between stakeholders and the board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the board.

The Executive Directors and Senior Management Personnel are actively engaged in regular interactions with various stakeholders, including investors, employees, and customers. These engagements provide invaluable feedback that plays a crucial role in the Company's commitment to sustainability. The feedback obtained from these interactions is then brought to the attention of the Board to ensure that the concerns and ideas of its stakeholders are given due consideration. In addition, any significant topics that arise through regular stakeholder engagement are brought to the Board through various channels. The Company has a well-defined process in place for addressing suggestions, complaints, and grievances, which are carefully evaluated based on their significance. Depending on the nature and scope of the issues, they are referred to the appropriate committee of the Board.

2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into the policies and activities of the entity.

Yes. The stakeholder consultations are one of the key inputs to determining the material topics. The Company looked at the aspects each stakeholder has brought out during the engagement and prioritized them using a risk and responsibility matrix to arrive at the Company's 12 material topics.

3. Provide details of instances of engagement with, and actions are taken to, address the concerns of vulnerable/ marginalized stakeholder groups.

HCL Foundation's CSR projects prioritize vulnerable and marginalized stakeholders, with interventions designed to benefit these groups. Through its CSR efforts, the HCL Foundation has impacted over 6.5 million lives, with 54% being female beneficiaries and over 13,500 people with disabilities have also benefitted through various initiatives. The foundation has planted over 2.12 million saplings, developed 243 water structures, and harvested 81 million liters of water in the last five years. Additionally, 72,000 acres of land has also been brought under green governance.

PRINCIPLE 5: Businesses should respect and promote human rights.

Essential Indicators

1. Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. of employees/ workers covered (B)	% (B / A)	Total (C)	No. of employees/ workers covered (D)	% (D / C)
Employees						
Permanent	227,481	2,17,733	95.71%	225,944	210,843	93.32%
Other than permanent	9,767	8,599	88.04%	15,408	13,364	86.73%
Total employees	237,248	2,26,332	95.39%	241,352	224,207	92.90%

2. Details of minimum wages paid to employees and workers

Category	FY 2023-24					FY 2022-23				
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees Permanent										
Male	160,982	0	0	160,982	100%	159,842	0	0%	159,842	100%
Female	66,268	0	0	66,268	100%	65,907	0	0%	65,907	100%
Others	231	0	0	231	100%	195	0	0%	195	100%
Other Than Permanent										
Male	7,437	0	0	7,437	100%	11,254	0	0%	11,254	100%
Female	2,238	0	0	2,238	100%	4,007	0	0%	4,007	100%
Others	92	0	0	92	100%	147	0	0%	147	100%

3. Details of remuneration/salary/wages

a. Median remuneration/wages:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category (₹ Lakhs /per annum)	Number	Median remuneration/ salary/ wages of respective category (₹ Lakhs /per annum)
Board of Directors (BoD)	9	116	5	94
Key managerial personnel	3	636	0	0
Employees other than BoD and KMP	168,416	15.29	68,506	7.62

Note:

1. One lakh = 100,000.

2. We have used a conversion ratio of INR 82.83 = 1 USD (average conversion rate across 12 months) in the median calculation.

b. Gross wages paid to females as % of total wages paid by the entity, in the following format:

	FY 2023-24	FY 2022-23
Gross wages paid to females as % of total wage	20.41%	20.16%

4. Do you have a focal point (individual/ committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

Yes, Employees are urged to report any issues pertaining to Human Rights to the Reporting Manager and/or the Global Ethics Helpline. Employees based in Germany/Netherlands can continue to raise their concerns and grievances by emailing to whistleblower@hcltech.com.

5. Describe the internal mechanisms in place to redress grievances related to human rights issues.

Employees and Individuals affected have access to mechanisms to raise concerns and such mechanisms are accessible, equitable and transparent. Any Employee or Individual may report a concern in writing or orally by communicating it either to their concerned reporting manager or Human Resources (HR). Employees can also raise concerns by submitting their grievance in the Global Ethics Helpline (MyHCLTech >>Top Ribbon (Main Menu)>> Ethics Helpline).

The aggrieved employee or individual can also address their concerns to the Whistleblower Committee via whistleblower@hcltech.com. Employees and Individuals are advised to submit a written complaint narrating the true sequence of the events leading to the violation along with any supporting evidence. Concerns may be reported as confidential or on an anonymous basis. We are committed to keeping the identity of the reporting Employee or Individual confidential to the maximum extent as consistent with the Company's legal obligations but subject to the Company's need to investigate reported violations.

6. Number of complaints on the following made by employees and workers:

	FY 2023-24			FY 2022-23		
	Filed during the year	Pending resolution at the end of year**	Remarks	Filed During the year	Pending resolution at the end of year**	Remarks
Sexual harassment*	87	11	-	55	16	-
Discrimination at workplace	0	NA	-	0	NA	-
Child labour	0	NA	-	0	NA	-
Forced labour/ Involuntary labour	0	NA	-	0	NA	-
Wages	0	NA	-	0	NA	-
Other human rights-related issues	0	NA	-	0	NA	-

* This is complaints reported globally and in section 7, the numbers are India specific.

** As on March 31, of the respective financial year.

7. Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format:

	FY 2023-24	FY 2022-23
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	75	46
Complaints on POSH as a % of female employees / workers	0.14%	0.09%
Complaints on POSH upheld	56	30

Note: Since POSH Act is India specific the numbers reported are for India operations.

8. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.

Employees must report any incidents of alleged harassment that they are aware of through channels provided by Global Ethics Helpline (GEH) which allows employees to make complaints about sexual harassment in the workplace online. Employees can also share their concerns and queries at secure@hcltech.com.

All official mechanisms for reporting issues/complaints are focused on preventing and addressing sexual harassment grievances in the workplace in accordance with HCL's Prevention and Redressal of Sexual Harassment at Workplace Policy. The policies and practices are in accordance with the applicable laws, especially the "The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013" for employees based in India, as well as other relevant rules in the countries where the company operates.

If an employee is subjected to sexual harassment, they should report it to secure@hcltech.com immediately. The Internal Complaints Committee ("ICC") investigates and addresses complaints received through this method with the utmost objectivity and confidentiality. HCL also guarantees that the standard SLAs required by law are satisfied.

False Accusation: If the ICC determines that the complaint against the respondent is malicious, that the aggrieved woman or anyone else filing it knew it was false, or that the aggrieved woman or anyone else filing it has produced any forged or misleading document, it may advise the employer to take appropriate action, such as issuing a written apology, issuing a warning, reprimanding or censured the employee, withholding a promotion, withholding a pay increase, terminating their employment, having them undergo counseling, or having them perform community service. However, this excludes claims that are hard to support or that were made in good faith.

Right to Appeal: Any individual who is dissatisfied with the recommendations made may file an appeal with the court or tribunal within the time frame specified, in the manner required, without prejudice to any provisions contained in any other legislation now in effect.

9. Do human rights requirements form part of your business agreements and contracts? (Yes/No)

Yes

10. Assessments of the year

	% of your plants and offices that were assessed (by the entity or statutory authorities or third parties)
Child labour	73%
Forced/involuntary labour	73%
Sexual harassment	73%
Discrimination at workplace	73%
Wages	73%
Others – please specify	-

11. Provide details of any corrective actions taken or underway to address significant risks/concerns arising from the assessments at Question 9 above.

No significant risk/concern identified.

Leadership Indicators

1. Details of a business process being modified/introduced as a result of addressing human rights grievances/complaints.

No significant changes in process were required resulting from the grievances and complaints this year.

2. Details of the scope and coverage of any human rights due diligence conducted

We have incorporated human rights aspects into the due diligence process for onboarding any new vendor.

3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

Yes, the company's offices are accessible to differently abled visitors as per the requirements of the Rights of Persons with Disabilities Act, 2016.

4. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual harassment	The company's assessment framework prioritizes risk considerations over solely focusing on business value. It emphasizes the inclusion of pertinent contractual clauses in agreements with vendors and ensures comprehensive communication of these requirements. 100% of all new vendor due diligences cover these topics particularly as part of the risk assessment for vendors identified as high-risk.
Discrimination at workplace	
Child labour	
Forced/involuntary labour	
Wages	
Others – please specify	

5. Provide details of any corrective actions taken or underway to address significant risks/concerns arising from the assessments at Question 4 above

Appropriate trainings and capacity buildings are conducted based on the concerns arising from the assessments.

PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment.

Essential Indicators

1. Details of total energy consumption (in Joules or multiples) and energy intensity:

Parameter	FY 2023-24	FY 2022-23
From Renewable Sources		
Total electricity consumption (A)	187403.10 GJ	178,785.52 GJ
Total fuel consumption (B)	0	-
Energy consumption through other sources (C)	0	-
Total energy consumed from renewable sources (A+B+C)	187403.10 GJ	178,785.52 GJ
From non-renewable sources		
Total electricity consumption (D)	782,259.72 GJ	794,631.75 GJ
Total fuel consumption (E)	15,509.60 GJ	44,080.16 GJ
Energy consumption through other sources (F)	0	-
Total energy consumed from non-renewable sources (D+E+F)	797,769.32 GJ	838,712.00 GJ
Total energy consumed (A+B+C+D+E+F)	985,172.42 GJ	1,017,497.43
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations) GJ/Million ₹	0.90	1.00
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted for PPP) Per million ₹	20.5	22.9
Energy intensity in terms of physical output	NA	-
Energy intensity (optional) – the relevant metric may be selected by the entity.	NA	-

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes. DNV Business Assurance India Private Limited (DNV).

2. Does the entity have any sites/facilities identified as designated consumers (DCs) under the performance, achieve, and trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken if any.

Not Applicable

3. Provide details of the following disclosures related to water, in the following format:

Parameter	FY 2023-24	FY 2022-23
Water withdrawal by source (in kiloliters)		
(i) Surface water	0	0
(ii) Groundwater	196,684.43	286,101.20
(iii) Third-party water (municipal water supplies)	301,249.04	342,432.63
(iv) Seawater / desalinated water	0	0
(v) Others (Rainwater, generated drinking water from Air, AHU Condensation and Municipality water)	250,365.57	244,154.00
Total volume of water withdrawal (in kiloliters) (i + ii + iii + iv + v)	748,299	872,688
Total volume of water consumption (in kiloliters)	737,685	863,373
Water intensity per rupee of turnover (water consumed / turnover) KL/Million ₹	0.67	0.85
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP) Per Million ₹	15.4	19.5
Water intensity in terms of physical output	NA	-
Water intensity (optional) – the relevant metric may be selected by the entity	NA	-

(Data covers only India operations)

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency

Yes. DNV Business Assurance India Private Limited (DNV)

4. Provide the following details related to water discharged:

Parameter	FY 2023-24	FY 2022-23
Water discharge by destination and level of treatment (in kiloliters).		
(i) To Surface water	-	-
- No Treatment	-	-
- With treatment-please specify level of treatment	-	-
(ii) To Groundwater	-	-
- No treatment	-	-
- With treatment – please specify level of treatment	-	-
(iii) To Seawater	-	-
- No treatment	-	-
- With treatment-please specify level of treatment	-	-
(iv) Sent to third parties	-	-
- No treatment	10,614	9,315
- With treatment-please specify level of treatment	-	-
(v) Others	-	-
- No treatment	-	-
- With treatment-please specify level of treatment	-	-
Total water discharged (in kiloliters)	10,614	9,315

(Data covers only India operations)

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes. DNV Business Assurance India Private Limited (DNV).

5. Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.

HCLTech treats 97% of its sewage water at its own sewage treatment plants. The treated water is subsequently reused within the company's campuses. Only 3% of the sewage water is directed to the common sewage treatment plants operated by local municipalities. HCLTech has set up two sewage treatment plants to recycle treated sewage, aiming to diminish the need for freshwater consumption. These plants serve various purposes including irrigation and flushing for washrooms and urinals.

6. Please provide details of air emissions (other than GHG emissions) by the entity:

Parameter	Unit	FY 2023-24	FY 2022-23
NOx	Tonnes	2.86	This is not material to the business.
SOx	Tonnes	0.36	
Particulate matter (PM)	Tonnes	0.51	
Persistent organic pollutants (POP)	Tonnes	0	
Volatile organic compounds (VOC)	Tonnes	0	
Hazardous air pollutants (HAP)	Tonnes	0	
Others – Please specify.	Tonnes	0	

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes. DNV Business Assurance India Private Limited (DNV)

7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) and its intensity:

Parameter	Unit	FY 2023-24	FY 2022-23
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	12,507.61	15,878
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	154,918	157,865
Total Scope 1 and Scope 2 emissions per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	MT CO ₂ Equivalent / Million ₹	0.15	0.17
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	Per Million ₹	3.5	3.9
Total Scope 1 and Scope 2 emission intensity in terms of physical output		NA	NA
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity		NA	NA

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes. DNV Business Assurance India Private Limited (DNV).

8. Does the entity have any project related to reducing greenhouse gas emission? If yes, then provide details. Yes. HCLTech has undertaken several projects aimed at reducing greenhouse gas emissions through various initiatives, including increasing renewable energy purchase, optimizing chiller and HVAC operations, utilizing energy-efficient lighting, and improving sewage treatment plant efficiency which has contributed to a reduction of 3.18% in total energy consumption as compared to FY2022- 23. These efforts demonstrate HCLTech's commitment to environmental sustainability and reducing its carbon footprint. Additionally, projects like Net Zero Intelligence Operations (NIO) contribute to real-time monitoring and reduction of energy consumption and emissions. The company has already switched 17.67%, or 36,965 MWh, of its total energy requirement to renewable sources. Out of this, 17,798 MWh are for its facilities in India, which include 1,761 MWh from onsite solar plant installations, and 19,167 MWh for its Geo sites. This has allowed the company to lower its carbon footprint by 16,202 tCO₂e (tonnes of carbon dioxide equivalent), with 14,647 tCO₂e in India and 1,787 tCO₂e in Geolocations.

Energy efficiency and reduction initiatives undertaken during FY 2023-24:

1. Energy efficient tech adoption at HCLTech includes daylight sensors, efficient lighting, and SMART energy meters, reducing emissions.
2. Chiller performance improved via fills replacement and temperature adjustments, saving 58 MWh and cutting 48 tCO₂e emissions.
3. HVAC efficiency boosted through unit upgrades and control enhancements, saving 615 MWh and reducing 506 tCO₂e emissions.
4. LED lighting expansion and control enhancements, including motion sensors, saved 1,757 MWh and cut 1,446 tCO₂e emissions.
5. UPS capacity optimized and passive filters activated, saving 406 MWh and reducing 335 tCO₂e emissions.
6. AHU control process improved with BMS system revamp, saving 148 MWh and cutting 121 tCO₂e emissions.

9. Provide details related to waste management by the entity, in the following format:

Parameter	FY 2023-24	FY 2022-23
Total waste generated (in metric tonnes)		
Plastic waste (A)	9.606	28.44
E-waste (B)	334.90	383.55
Bio-medical waste (C) (India operations)	4	3.97
Construction and demolition waste (D) (India operations)	64	29.10
Battery waste (E)	222	67.60
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G) (Used oil and oil filters) (India operations)	16.41	11.2
Other Non-hazardous waste generated (H). Please specify, if any. (Food waste and other general waste)	1,759	1,468.30
Total (A+B + C + D + E + F + G + H)	2,409.92	1,992.16
Waste intensity per rupee of Turnover (Total waste generated /Revenue from operations) per million ₹	0.0022	0.0020
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP) per million ₹	0.05	0.045
Waste intensity in terms of physical output	NA	NA
Waste intensity (optional) – the relevant metric may be selected by the entity.	NA	NA

For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	1,914	1,525
(ii) Re-used	-	85
(iii) Other recovery operations	-	-
Total	1,914	1,610
For each category of waste generated, total waste disposed of by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	9	8
(ii) Landfilling	0	0
(iii) Other disposal operations	0	0
Total	9	8

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes. DNV Business Assurance India Private Limited (DNV).

10. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce the usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.

- Implementation of glass water bottles for client visits, internal meetings, and events nationwide, eliminating the use of plastic mineral pet bottles.
- Elimination of plastic in cafeterias, all HB boarding houses refrain from using single-use plastic.
- Transition from PET bottles to cans for aerated beverages in cafeterias and automatic F&B vending machines.
- Introduction of glass jars for meeting room snacks across India, replacing cling film-covered plates.
- E-waste management: Replacement of conventional lights with LED lights to mitigate mercury's harmful effects, and substitution of projectors with LEDs to reduce power consumption and waste.
- Paper conservation efforts: Initiatives such as deploying printer pins, limiting printing, encouraging double-sided printing, and reducing font size contribute to a paperless campus.
- Waste management strategy focuses on the principles of Reduce, Recycle, and Reuse (3R's), with waste categorized by source and disposal method. Hazardous waste is disposed of responsibly, paper waste is recycled, biomedical waste is safely disposed of, and food and garden waste are reused for composting.

11. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones, etc.) where environmental approvals/clearances are required, please specify details in the following format:

No

12. Details of Environmental Impact Assessments of projects undertaken by the entity based on applicable laws, in the current financial year:

No

13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India, such as the Water (prevention and control of pollution) Act, Air (prevention and control of pollution) Act, Environment Protection Act, and rules there under (Y/N). If not, provide details of all such non-compliances, In the following format:

Yes

Leadership Indicators

1. Water withdrawal, consumption and discharge in areas of water stress (in kilolitres):

For each facility / plant located in areas of water stress, provide the following information:

- (i) Name of the area: Not Applicable
- (ii) Nature of operations: Not Applicable
- (iii) Water withdrawal, consumption and discharge: Not Applicable

2. Please provide details of total Scope 3 emissions & their intensity:

Parameter	Unit	FY 2023-24	FY 2022-23
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	247,460	277,267
Total Scope 3 emissions per rupee of turnover	MT CO ₂ e / Million Rs	0.23	0.27
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity		NA	NA

3. With respect to the ecologically sensitive areas reported at Question 10 of essential indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along with prevention and remediation activities.

Not Applicable

4. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge/waste generated, please provide details of the same as well as the outcome of such initiatives:

All initiatives resulting into improved efficiency and reduced environmental impact during the Financial Year 2024 is detailed in the environment section of the Sustainability Report 2024.

5. Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.

Technological, geopolitical, societal, economic, and environmental risks are all coming together to create an intrinsically complex and fast-changing global risk landscape. The Company's reputation as a 21st Century Enterprise is often measured by its resilience to threats, and how efficiently. The Company respond & manage business disruptions. HCLTech is committed to its employees, clients, and interested parties to ensure that necessary efforts are made to safeguard life and safety of personnel, protect property and resume critical services at predefined levels in the event of any untoward incident. To meet the organizational continuity objective, The Company have made significant efforts towards Crisis Management and Resilience planning to ensure effective response, prioritized recovery of its time-sensitive operations and mitigation of potential business continuity risks.

Crisis and Resilience ("C&R") Program falls under the purview of Risk and Compliance function headed by the Chief Risk Officer of HCLTech. The C&R Program is guided by the board, led by subject matter experts, and is based on ISO 22301 standard and global best practices. The Company undertake active engagement with ecosystem partners for real-time horizon scanning of risks and early warning signals. The Company has embedded Resilience-by-Design philosophy in the firm across different dimensions of the "new-normal" including resilience in work, workforce, workplace, technology, supply chain, and leadership. The Company has started integrating climate change risks into each of these dimensions and their business continuity / contingency planning solutions.

Being an IT / ITeS provider, there is a potential that our operations may be affected due to core-technical risks materializing in our environment like technology failures, programming errors, cyberattacks etc. In order to mitigate these risks, The Company has embedded 'Resilience-by-Design' across our organization through:

- Battle hardened Business Continuity & Disaster Recovery Plans including Cyber Incident readiness
- Geographically dispersed Data Centers
- Robust multi-vendor MPLS & Internet Network
- Scalable Work from Home (WFH) Computing capability with stringent security controls

HCLTech's Exercising and Testing Framework provides a comprehensive approach to validate effectiveness of the business continuity strategies implemented across the organization. The Company conduct exercises at facility, city, country level(s) based on nature, scale, and complexity of operations. Types of business continuity exercises include (1) Call Tree, (2) Tabletop and (3) Simulation.

Furthermore, our Crisis Management Framework provides agile response, timely communication with internal and external stakeholders, and recovery & restoration based on the rapidly evolving global threat landscape, which includes climate threats.

6. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard.

There were no significant adverse impacts to the environment arising from the value chain of HCLTech.

7. Percentage of value chain partners (by the value of business done with such partners) that were assessed for environmental impacts.

S. No.	No. of value chain partners that were assessed	% of value chain partners (by value of business done with such partners) that were assessed	Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard
1	1,158	The Company does not monitor the percentage of value chain partners by the value of business. The Company takes a risk based approach to execute vendor assessment.	No significant adverse impacts identified.

PRINCIPLE 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.

Essential Indicators

1. a. Number of affiliations with trade and industry chambers/ associations.

27

b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such a body) the entity is a member of/ affiliated to.

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Confederation of Indian Industry ("CII")	National
2	National Association of Software and Service Companies ("NASSCOM")	National
3	World Economic Forum ("WEF")	Global
4	Federation of Indian Chambers of Commerce & Industry ("FICCI")	National

2. Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities.

Name of authority	Brief of the case	Corrective action taken
There were no incidents pertaining to anti-competitive conduct by the Company.		

Leadership Indicators

1. Details of public policy positions advocated by the entity:

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in the public domain? (Yes/No)	Frequency of review by board (Annually/ half yearly/ quarterly / others – please specify)	Web-link, if available
The Company believes in the public good and contributes to building a responsible society through various platforms, advocacy channels and forums by way of lending Company's ideas, visions expertise and thought leadership. The Company has aligned itself with relevant organizations which work in the larger business / social / environmental and community interests. In addition, the Company also creates and owns innovative pieces of work and solutions such as the Aquaprenuer Initiative with the World Economic Forum (WEF) to foster multi-stakeholder collaboration for the conservation of freshwater.					

PRINCIPLE 8: Businesses should promote inclusive growth and equitable development.

Essential Indicators

- 1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.**

Not Applicable

- 2. Provide information on the project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity:**

Not Applicable

- 3. Describe the mechanisms to receive and redress grievances of the community.**

The corporate social responsibility agenda for HCLTech is delivered by the HCL Foundation. It deeply upholds the value of accountability and aims to accept, assess, and resolve feedback or complaints received from our community of stakeholders ranging from but not limited to HCL Foundation employees, HCLTech employees, volunteers, third-party employees, consultants associated with our projects, NGO partners, social sector organizations, government authorities, programme participants, community members and others. Any deviation from the law of the land, HCLTech Code of Conduct or HCL Foundation Child Protection Policy by any stakeholder associated with our programmes / projects is taken up seriously for review and redressal via multi-pronged, scientific and transparent channels. HCL Foundation aims to ensure that every stakeholder is provided a safe environment to share their concerns/grievances. High level of confidentiality is maintained in sensitive matters to respect and maintain dignity of the complainant. Redressal on grievances is carried out as per the nature of the grievance, basis guidelines defined in the organization's policies

- 4. Percentage of input material (inputs to total inputs by value) sourced from suppliers:**

	FY 2023-24	FY 2022-23
Directly sourced from MSMEs/ small producers	11.58%	8.48%
Directly from within India	93%	93%

Note: This data pertains to procurement in India

- 5. Job creation in smaller towns – Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the following locations, as % of total wage cost**

Location	FY 2023-24	FY 2022-23
Rural	0	0
Semi-Urban	0	0
Urban	0	0
Metropolitan	100%	100%

(Place categorized as per RBI Classification System - rural / semi-urban / urban / metropolitan)

Leadership Indicators

- 1. Provide details of actions taken to mitigate any negative social impacts identified in the social impact assessments (Reference: Question 1 of essential indicators above):**

Not Applicable

- 2. Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:**

S. No.	State	Aspirational district	Amount spent (In ₹)
1	Chhattisgarh	Bastar	1,67,67,575
2	Jammu & Kashmir	Baramulla	20,00,000
3	Jammu And Kashmir	Kupwara	20,00,000
4	Karnataka	Raichur	6,58,240
5	Karnataka	Yadgir	6,58,240
6	Madhya Pradesh	Guna	50,00,000
7	Tamil Nadu	Ramanathapuram	32,34,000

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized/vulnerable groups?

Yes, The company has implemented a procurement policy that emphasizes on the advancement of small, local, and diverse businesses. The definition of “diverse” may vary depending on the country, but it generally encompasses underrepresented segments of the population such as local minorities, gender, veteran, sexual orientation, disability, economically disadvantaged, and others

(b) From which marginalized/vulnerable groups do you procure?

HCLTech is committed to sourcing from marginalized and vulnerable groups such as Minority Business Enterprises (MBE), Women Business Enterprises (WBE), Veteran-Owned Businesses (VET), Disabled individuals, LGBTQIA+ and small suppliers. The company’s procurement procedures are designed in accordance with the local regulatory requirements in the countries where it operates.

(c) What percentage of total procurement (by value) does it constitute?

For combined US, Canada & UK, the spend is 32% of total procurement spend of these geographies.

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

Not Applicable

5. Details of corrective actions taken or underway, based on any adverse order in intellectual property-related disputes wherein usage of traditional knowledge is involved.

Not Applicable

6. Details of beneficiaries of CSR projects:

S. No	CSR project	No. of persons benefited from CSR projects	% of beneficiaries from vulnerable and marginalized groups
1.	Uday: HCL Foundation’s flagship program is designed to break the cycle of urban poverty in the company’s surrounding neighborhoods. Currently, the program operates in eleven cities throughout India, including Noida, Chennai, Bengaluru, Lucknow, Nagpur, Madurai, Vijayawada, Coimbatore, Hyderabad, Kolkata, and Pune	10,32,478	100%
2.	The HCLTech Grant is a flagship program of HCLFoundation, which recognizes, strengthens, and empowers NGOs working in the field of rural development. The grant is awarded PAN India in three thematic categories: Environment, Health, and Education.	20,10,316	100%
3.	HCL Foundation’s flagship programme, Harit, aims to promote the conservation, restoration, and enhancement of indigenous environmental systems in a sustainable manner through community engagement. The programme is currently operational in eleven states of India, namely Uttar Pradesh, Tamil Nadu, Karnataka, Maharashtra, Andhra Pradesh, Telangana, Odisha, West Bengal, Uttarakhand, Rajasthan, and Madhya Pradesh.	17,913	100%
4.	Samuday is a flagship CSR programme that aims to develop a sustainable, scalable, and replicable model for economic and social development of rural areas. This programme is run in partnership with central and state governments, local communities, NGOs, knowledge institutions, and allied partners. The objective is to bring about positive change in selected villages through optimal interventions in the areas of Agriculture, Education, Health, Infrastructure, Livelihood, and WASH (Water, Sanitation & Hygiene). The initiative focuses on creating a source code for the comprehensive development of rural areas that can be implemented across the country.	24,54,138	100%
5.	“My Clean City” is a program aimed at implementing effective solid waste management in Noida and Greater Noida through transformation of cities into waste-free regions by covering residential welfare associations and urban villages	5,89,642	100%
6.	HCL Foundation is dedicated to assisting the country during times of calamity, whether natural or manmade. The foundation’s Disaster Risk Reduction and Management (DRR/M) initiative in India include mitigation, relief and response, rehabilitation, and build-back-better projects. The program strives to mitigate the effect of catastrophes and humanitarian crises by supporting people in need.	4,20,384	100%

PRINCIPLE 9: Businesses should engage with and provide value to their consumers in a responsible manner.

Essential Indicators

1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.

Yes, HCLTech's Grievances and Complaints Management includes a Customer Advisory Board (CAB), CREST, ACSAT & PCSAT, CRISP, Account Management Teams and HR-related complaints. CAB comprises CXOs from strategic accounts across industries, while CREST implements a governance framework for regular client checks and action implementation. ACSAT & PCSAT measure client satisfaction at project and engagement levels, while CRISP enhances customer relationships and services. Account Management Teams connect with customers monthly to capture and highlight feedback, and HR-related complaints are forwarded to hear@hcltech.com.

Furthermore, HCLTech has implemented a Whistleblower Policy, which clearly specifies the procedure for filing a complaint and is available to all stakeholders, including customers and clients. They can email their concerns to whistleblower@hcltech.com for effective redressal.

2. Turnover of products and/or services as a percentage of turnover from all products/services that carry information about:

	As a % to total turnover
Environmental and social parameters relevant to the product	Not Applicable
Safe and responsible usage	Not Applicable
Recycling and/or safe disposal	Not Applicable

3. Number of consumer complaints in respect of the following:

	FY 2023-24		Remarks	FY 2022-23		Remarks
	Receive during the year	Pending resolution at end of year		Received during the year	Pending resolution at end of year	
Data privacy	Nil	Nil	Nil	Nil	Nil	Nil
Advertising	Nil	Nil	Nil	Nil	Nil	Nil
Cyber-security	1	Nil	Nil	Nil	Nil	Nil
Delivery of essential services	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Restrictive trade practices	Nil	Nil	-	Nil	Nil	Nil
Unfair trade practices	Nil	Nil	Nil	Nil	Nil	Nil
Other	Nil	Nil	Nil	Nil	Nil	Nil

Note: A security incident was observed in an isolated cloud environment for one of our client's projects. There was no impact observed due to this incident on the overall HCLTech network. HCL engaged an external agency for investigation, which, reported:

- There was no evidence of data exfiltration.
- There was no evidence of compromise in HCLTech Corporate environment.

4. Details of instances of product recalls on account of safety issues.

Not Applicable

5. Does the entity have a framework/policy on cyber security and risks related to data privacy? If available, provide a web link to the policy.

Yes, HCLTech has a well-established Information Security Management framework based on ISO 27001:2013. Information Security Management System policies, processes and guidelines are established to ensure confidentiality, integrity, and availability of customer data. An Information security policy is hosted on HCLTech Policies HUB and available to all users.

To effectively respond to rapidly evolving data privacy and cyber security landscape, HCLTech, has implemented a comprehensive data privacy and cyber security program. The cybersecurity practices at HCLTech are aligned with the Global NIST cyber security framework and industry standards such as ISO 27001. HCL Tech's privacy program is supported by an enterprise-wide Privacy & Data Protection Framework that is tailored to accommodate HCL's operations, nature, scope and sensitivity of personal data, legal, regulatory, contractual obligations, risks to data, and defined privacy principles and privacy standards such as ISO 27701 Privacy Information Management System. We have established minimum baseline control standards and a defense in depth approach to ensure privacy and cyber security controls are embedded throughout the asset, identity, and data lifecycle.

Continuous validation of controls such as vulnerability assessments, penetration testing, breach & attack simulation (e.g., phishing simulations) etc. covering all infrastructure and application assets are performed to continually manage our risk posture. A 24x7 Cyber Defense Center is established to identify and respond to any potential threats to HCLTech environment. The effectiveness of the privacy and cyber security controls at HCLTech is monitored and tested internally by an independent internal audit team as well as by independent external third parties on a periodic basis.

At HCLTech, we take pride in pursuing ways to enhance privacy and cyber security knowledge and awareness and embed a culture of privacy and data protection throughout the organization. Employees and third-party resources undergo mandatory enterprise-wide privacy and cyber security training covering key privacy and cyber security concepts, principles, laws, best practices, and contractual obligations. HCLTech has also created an extensive network of privacy & cyber security champions who play a critical role in embedding and reinforcing privacy and cyber security knowledge and best practices at an operational level.

The Privacy and Cyber Security programs at HCLTech are overseen by the Chief Privacy Officer (CPO) and Chief Information Security Officer (CISO) respectively. HCLTech has also appointed an external global Data Protection Officer to provide assurances, accountability, and independence as is necessary for complying with privacy laws. Further as a proactive measure and to ensure enhanced protection of personal data processed globally at HCLTech offices, we have documented, and implemented our Binding Corporate Rules (BCRs) framework and are in the process of seeking approval for our BCR applications both as a data controller and processor from EU/EEA data protection authorities.

HCL Tech's global privacy policy sets out the mandate for the organization with regard to personal data processing activities both as a controller and data processor. The policy requires all processing activities to be lawful and comply with a defined set of privacy principles outlined in the privacy policy such as purpose limitation, necessity and proportionality, data minimization, security, and storage limitation, etc. We only process personal data for the purpose it was collected and in line with legal requirements, secondary use of data without an individual's permission is not recommended. HCL Tech respects the rights of data subjects and has enabled an easy-to-use and external-facing Data Subject Rights Portal for data subjects to exercise their rights as per applicable laws and regulations.

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty/action taken by regulatory authorities on the safety of products/services.

HCLTech has a well-defined, Information Cyber Security and Privacy Incident Handling Procedure covering Security and privacy incidents. Any incidents reported to the Incident Response team is Triaged as per the process, Incident Response Playbook is followed, it's analyzed for the root cause, and corrective & preventive action is taken. No reported incident is underway with Regulators.

7. Provide the following information relating to data breaches:

- a. Number of instances of data breaches-**
Zero, No material breaches
- b. Percentage of data breaches involving personally identifiable information of customers –**
Not Applicable
- c. Impact, if any, of the data breaches**
Not Applicable.

Leadership Indicators

1. Channels/platforms where information on products and services of the entity can be accessed.

<https://www.hcltech.com>

2. Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.

Not Applicable

3. Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.

Not Applicable

4. Does the entity display product information on the product over and above what is mandated as per local laws? Did your entity carry out any survey with regard to consumer satisfaction relating to the major products/services of the entity, significant locations of operation of the entity, or the entity as a whole? (Yes/No)

Yes

INDEPENDENT ASSURANCE STATEMENT

Introduction

DNV Business Assurance India Private Limited ('DNV'), has been commissioned by HCL Technologies Ltd (Corporate Identity Number L74140DL1991PLC046369, hereafter referred to as 'HCLTech' or 'the Company') to undertake an independent assurance of the Company's disclosures in Business Responsibility and Sustainability Report (hereafter referred as 'BRSR'). The disclosures include the indicators across 9 core attributes as per Annexure I of SEBI circular dated 12 July 2023 and the non-financial disclosures in BRSR as per the Annexure II of SEBI circular dated 12 July 2023.

Reporting standard/framework

The disclosures have been prepared by HCLTech in reference to:

- BRSR Core – Framework for assurance and ESG disclosures for value chain as per SEBI (Securities and Exchange Board of India) Circular No. SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dated July 12, 2023.
- BRSR reporting guidelines (Annexure II) as per SEBI Circular No. SEBI/HO/CFD/CMD-2/P/CIR/2021/562 dated May 10, 2021, and incorporated Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023.
- Greenhouse Gas Protocol: *A Corporate Accounting and Reporting Standard*.
- ISO 14064-1:2018 - *Specification with guidance at the organization level for quantification and reporting of greenhouse gas emissions and removals*

Assurance Methodology/Standard

This assurance engagement has been carried out in accordance with DNV's VeriSustain protocol, V6.0, which is based on our professional experience and international assurance practice, and the international standard in Assurance Engagements, ISAE 3000 (revised) - *Assurance Engagements other than Audits or Reviews of Historical Financial Information*. DNV's Verisustain Protocol has been developed in accordance with the most widely accepted reporting and assurance standards.

Intended User

The intended user of this assurance statement is the Management of HCLTech ('the Management').

Level of Assurance

- Reasonable Level of assurance for the indicators across 9 core attributes of BRSR as per Annexure I of SEBI circular;
- Limited Level of assurance for the Non-Financial disclosures of BRSR report as per Annexure II of SEBI circular.

Responsibilities of the Management of HCLTech and of the Assurance Provider

The Management of HCLTech has the sole responsibility for the preparation of the BRSR Report and is responsible for all information disclosed in the BRSR Core and BRSR Report. The company is responsible for maintaining processes and procedures for collecting, analyzing and reporting the information and also, ensuring the quality and consistency of the information presented in the Report. HCLTech is also responsible for ensuring the maintenance and integrity of its website and any referenced BRSR disclosures on their website.

In performing this assurance work, DNV's responsibility is to the Management of HCLTech; however, this statement represents our independent opinion and is intended to inform the outcome of the assurance to the stakeholders of the Company.

Scope, Boundary and Limitations

Scope

The scope of our engagement includes independent Reasonable level of assurance of indicators across 9 core attributes (Ref: Annexure I of SEBI Circular) and a Limited level of assurance for the non-financial disclosures in BRSR (Ref: Annexure II of SEBI circular) for the Financial Year (FY) 2023-24.

Boundary of our assurance work:

- *BRSR Core indicators*: Boundary covers the performance of HCLTech operations that fall across the direct operational control of the Company's legal structure. Based on the agreed scope with the Company, the boundary of reasonable assurance covers the operations of HCLTech across all global locations, unless otherwise stated in the table below.

BRSR Core Attribute	Boundary for reasonable Assurance
Attribute 2: Water footprint	India Locations
Attribute 4: Waste reported for Biomedical Waste, C&D waste, Used Oil	India Locations
Attribute 7: Enabling Inclusive Development	India Locations

- *Rest non-financial disclosures in BRSR report:* Boundary for the rest non-financial disclosures in BRSR covers the operations of HCLTech across all global locations, unless otherwise stated below.
 - Same as mentioned for the BRSR core attributes related cross references to the BRSR, and wherever specified in the BRSR report as applicable for India locations only.

Limitation(s):

We performed a reasonable Level of assurance for the BRSR Core attributes and a limited level of assurance for the BRSR reporting based on our assurance methodology VeriSustain, v06.

The assurance scope has the following limitations:

- The assurance engagement considers an uncertainty of $\pm 5\%$ based on materiality threshold for estimation/measurement errors and omissions.
- DNV has not been involved in evaluation or assessment of any financial data/performance of the company. DNV opinion on specific BRSR indicators across 9 core attributes (ref- all sections of core indicators where currency; INR has been applied, attribute 8,9) relies on the third party audited financial reports of the Company. DNV does not take any responsibility of the financial data reported in the audited financial reports of the Company.
- The assessment is limited to data and information within the defined Reporting Period. Any data outside this period is not considered within the scope of assurance.
- Data outside the operations specified in the assurance boundary is excluded from the assurance, unless explicitly mentioned otherwise in this statement.
- The assurance does not cover the Company's statements that express opinions, claims, beliefs, aspirations, expectations, aims, or future intentions. Additionally, assertions related to Intellectual Property Rights and other competitive issues are beyond the scope of this assurance.
- The assessment does not include a review of the Company's strategy, or other related linkages expressed in the Report. These aspects are not within the scope of the assurance engagement.
- The assurance does not extend to mapping the Report with reporting frameworks other than those specifically mentioned. Any assessments or comparisons with frameworks beyond the specified ones are not considered in this engagement.
- Aspects of the Report that fall outside the mentioned scope and boundary are not subject to assurance. The assessment is limited to the defined parameters.
- The assurance engagement does not include a review of legal compliances. Compliance with legal requirements is not within the scope of this assurance, and the Company is responsible for ensuring adherence to relevant laws.
- The assurance engagement is based on the assumption that the data and information provided by the Company are complete, sufficient and authentic.

Assurance process

As part of the assurance process, a multi-disciplinary team of assurance specialists performed assurance work for selected sites of HCLTech. We adopted a risk-based approach, that is, we concentrated our assurance efforts on the issues of high material relevance to the Company's business and its key stakeholders. We carried out the following activities:

BRSR Core Attributes – Reasonable level of Assurance	Rest non-financial disclosures in BRSR Report – Limited Level of Assurance
Reviewed the disclosures across BRSR Core, encompassing the framework for assurance consisting of a set of Key Performance Indicators (KPIs) under 9 ESG attributes. The format of BRSR Core used a basis of reasonable level of assurance	Reviewed the disclosures under BRSR reporting guidelines. Our focus included general disclosures, management processes, principle wise performance (essential indicators, and leadership indicators) and any other key metrics specified under the reporting framework. The BRSR reporting format used a basis of limited level of assurance.
Evaluation of the design and implementation of key systems, processes and controls for collecting, managing and reporting the BRSR Core indicators	Understanding the key systems, processes and controls for collecting, managing and reporting the non-financial disclosures in BRSR report.
Assessment of operational control and reporting boundaries	Walk-through of key data sets. Understand and test, on a sample basis, the processes used to adhere to and evaluate adherence to the reporting principles.
Seek extensive evidence across all relevant areas, ensuring a detailed examination of BRSR Core indicators. Engaged directly with stakeholders to gather insights and corroborative evidence for each disclosed indicator.	Collect and evaluate documentary evidence and management representations supporting adherence to the reporting principles.
Interviews with selected senior managers responsible for management of disclosures and review of selected evidence to support environmental KPIs and metrics disclosed the Report. We were free to choose interviewees and interviewed those with overall responsibility of monitoring, data collation and reporting the selected indicators.	Interviews with the senior managers responsible for management of disclosures. We were free to choose interviewees and interviewed those with overall responsibility of monitoring, data collation and reporting the selected indicators.

BRSR Core Attributes – Reasonable level of Assurance	Rest non-financial disclosures in BRSR Report – Limited Level of Assurance
DNV audit team conducted on-site audits for data testing and also, to assess the uniformity in reporting processes and also, quality checks at different locations of the Company. Sites for data testing and reporting system checks were selected based on the %age contribution each site makes to the reported indicator, complexity of operations at each location (high/low/medium) and reporting system within the organization. Sites selected for audits are listed in Annex-II.	DNV audit team conducted on-site audits for corporate offices and sites. Sample based assessment of site-specific data disclosures was carried out. We were free to choose sites for conducting our assessment.
Conduct a comprehensive examination of key material aspects within the BRSR Core framework supporting adherence to the assurance based on applicable principles plus specified data and information.	Reviewed the process of reporting as defined in the assessment criteria.

In both the cases, DNV teams conducted the:

- Verification of the data consolidation of reported performance disclosures in context to the Principle of Completeness.
- Verification of the consolidated reported performance disclosures in context to the Principle of Completeness as per VeriSustain™ for both reasonable level and limited level verification for the disclosures.

Conclusion

Reasonable level of Assurance- BRSR 9 Core Attributes

Based on our review and procedures followed for reasonable level of assurance, DNV is of the opinion that, in all material aspects, the BRSR indicators across 9 core attributes (as listed in Annex I of this statement) for FY 2023-24 are reported in accordance with reporting requirements outlined in BRSR Core (Annexure I of SEBI Circular dated 12 July 2023).

Limited Level of Assurance- BRSR Reporting Format

On the basis of the assessment undertaken, nothing has come to our attention to suggest that the disclosures do not properly adhere to the reporting requirements as per BRSR reporting guidelines (Annexure II of SEBI Circular).

Statement of Competence and Independence

DNV applies its own management standards and compliance policies for quality control, which are based on the principles enclosed within ISO IEC 17029:2019 – Conformity assessment – General principles are requirements for validation and verification bodies, and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

We have complied with the DNV Code of Conduct¹ during the assurance engagement and maintain independence wherever required by relevant ethical requirements. This engagement work was carried out by an independent team of sustainability assurance professionals. During the reporting period i.e. FY 2023-24, DNV, to the best of its knowledge, was not involved in any non-audit/non- assurance work with the Company and its Group entities which could lead to any Conflict of Interest. DNV was not involved in the preparation of any statements or data included in the Report except for this Assurance Statement for internal use of HCLTech. DNV maintains complete impartiality toward stakeholders interviewed during the assurance process. We did not provide any services to HCLTech in the scope of assurance for the reporting period that could compromise the independence or impartiality of our work.

Purpose and Restriction on Distribution and Use

This assurance statement, including our conclusion has been prepared solely for the exclusive use and benefit of management of the Company and solely for the purpose for which it is provided. To the fullest extent permitted by law, DNV does not assume responsibility to anyone other than the Company for DNV's work or this assurance statement. The usage of this assurance statement shall be governed by the terms and conditions of the contract between DNV and the HCLTech. DNV does not accept any liability if this assurance statement is used for an alternative purpose from which it is intended, nor to any third party in respect of this assurance statement. No part of this assurance statement shall be reproduced, distributed or communicated to a third party without prior written consent.

For DNV Business Assurance India Private Limited

Sarkar Chandan <i>Digitally signed by Sarkar, Chandan</i> Date: 2024.06.12 18:08:57 +05'30'	Kakaraparthi Venkata Raman <i>Digitally signed by Kakaraparthi, Venkata Raman</i> Date: 2024.06.13 10:32:37 +05'30'
Chandan Sarkar Lead Verifier, Sustainability Services, DNV Business Assurance India Private Limited, India.	Kakaraparthi Venkata Raman Assurance Reviewer, Sustainability Services, DNV Business Assurance India Private Limited, India.
Assurance Team: Karthik Ramaswamy, Roshni Sarage, Anamika Kumari	

12/06/2024, Bengaluru, India.

¹ DNV Corporate Governance & Code of Conduct - <http://www.dnv.com/about/in-brief/corporate-governance-html>

Annex I

Verified Data

Stipulated as per [BRSR Core](#) provided by the company.

Sr. No.	Attribute	BRSR Core Parameter	Measurement	Unit	FY 24	Comments		
Attribute 1	Green-house gas (GHG) footprint	Total Scope 1 emissions	Total Scope 1 emissions	Metric tonnes of CO2 equivalent	12,507.61			
		Total Scope 2 emissions	Total Scope 2 emissions	Metric tonnes of CO2 equivalent	154,918			
		GHG Emission Intensity (Scope 1 +2)	Total Scope 1 and Scope 2 GHG emissions / Revenue from operations	MT CO2 Equivalent/Million ₹	0.15			
			Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP	MT CO2 Equivalent/Million ₹	3.5			
			Total Scope 1 and Scope 2 emission intensity in terms of physical output		NA			
Attribute 2	Water footprint	Total water consumption	Water withdrawal by source (in kiloliters)					
			(i) Surface water	KL	0			
			(ii) Groundwater	KL	196,684.43			
			(iii) Third-party water (municipal water supplies)	KL	301,249.04			
			(iv) Seawater / desalinated water	KL	0			
			(v) Others (Rainwater and Municipality water)	KL	250,365.57			
			Total volume of water withdrawal (in kiloliters) (i + ii + iii + iv + v)	KL	748,299			
			Total volume of water consumption (in kiloliters)	KL	737,685			
		Water consumption intensity	Water intensity per Million rupee of turnover (water consumed / turnover)	KL/Million ₹	0.6712			
			Water intensity per Million rupee of turnover adjusted for PPP	KL/Million ₹	15.4			
		Water Discharge by destination and levels of Treatment	(i) To Surface water	- No Treatment	Mn Lt or KL	0		
				- With treatment- please specify level of treatment	Mn Lt or KL	0		
				(ii) To Groundwater	- No treatment	Mn Lt or KL	0	
					- With treatment – please specify level of treatment	Mn Lt or KL	0	
					(iii) To Seawater	- No treatment	Mn Lt or KL	0
				- With treatment- please specify level of treatment		Mn Lt or KL	0	
				(iv) Sent to third parties		- No treatment	Mn Lt or KL	10,614.00
					- With treatment- please specify level of treatment	Mn Lt or KL	0	
					(v) Others	- No treatment	Mn Lt or KL	0
				-With treatment- please specify level of treatment		Mn Lt or KL	0	
				Total water discharged (in kiloliters)		Mn Lt or KL	10,614.00	

Sr. No.	Attribute	BRSR Core Parameter	Measurement	Unit	FY 24	Comments
Attribute 3	Energy footprint	% of energy consumed from renewable sources	Energy consumed through renewable sources / total energy consumed	%	19%	
		Total energy consumed	Total electricity consumption (A)	GJ	187,403.1	
			Total fuel consumption (B)	GJ	0	
			Energy consumption through other sources (C)	GJ	0	
			Total energy consumed from renewable sources (A+B+C)	GJ	187,403.1	
			From non- renewable sources	GJ		
			Total electricity consumption (D)	GJ	782,259.72	
			Total fuel consumption (E)	GJ	15,509.60	
			Energy consumption through other sources (F)	GJ	0	
			Total energy consumed from non-renewable sources (D+E+F)	GJ	797,769.32	
			Total energy consumed (A+B+C+D+E+F)	GJ	985,172.42	
		Energy Intensity	Energy intensity per Million rupee of turnover	GJ/Million ₹	0.90	
			Energy intensity per Million rupee of turnover adjusted for PPP	GJ/Million ₹	20.5	
			Energy intensity in terms of physical output		NA	
Attribute 4	Embracing circularity – details related to waste management by the entity	Plastic waste (A)	Kg / MT	Metric tonnes	9.606	
		E-waste (B)	Kg / MT	Metric tonnes	334.9	
		Bio-medical waste (C)	Kg / MT	Metric tonnes	4	
		Construction and demolition waste (D)	Kg / MT	Metric tonnes	64	
		Battery waste (E)	Kg / MT	Metric tonnes	222	
		Radioactive waste (F)	Kg / MT	Metric tonnes	0	
		Other Hazardous waste(G) Please specify, if any.	Kg / MT	Metric tonnes	16.41	
		Other Non-hazardous waste generated (H). Please specify, if any.	Kg / MT	Metric tonnes	1,759	
Total waste generated ((A+B + C + D + E + F + G + H)	Kg / MT	Metric tonnes	2,409.92			

Sr. No.	Attribute	BRSR Core Parameter	Measurement	Unit	FY 24	Comments	
		Waste Intensity	Kg or MT / Revenue from Operations (in Million INR)	MT/Million ₹	0.0022		
			Waste intensity per Million rupee of turnover adjusted for PPP	MT/Million ₹	0.05		
			Kg or MT / Unit of Product or Service		NA		
		Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations	(i) Recycled	Metric Tonnes	1,914	Batteries E-Waste, Oil Waste, Other non-hazardous waste	
			(ii) Re-used	Metric Tonnes	-		
			(iii) Other recovery operations	Metric Tonnes	-		
		For each category of waste generated, total waste disposed by nature of disposal method	(i) Incineration	Metric Tonnes	9	DG filters, Oil soaked cotton, Bio-Medical Waste	
			(ii) Landfilling	Metric Tonnes	0		
			(iii) Other disposal operations	Metric Tonnes	0		
Attribute 5	Enhancing Employee Wellbeing and Safety	Spending on measures towards wellbeing of employees and workers – cost incurred as a % of total revenue of the company	In % terms	%	1.93%		
			Details of safety related incidents for employees and workers (including contract-workforce e.g. workers in the company's construction sites)	Total recordable work-related injuries	Employees	27	
				Lost Time Injury Frequency Rate (LTIFR) (per one- million-person hour worked)	Employees	0.008,639	
				No. of fatalities	Employees	0	
				High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	
Attribute 6	Enabling Gender Diversity in Business	Gross wages paid to females as % of wages paid	In % terms	%	20.41%		
			Complaints on POSH (sexual harassment)	Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	Nos.	75	
				Complaints on POSH as a % of female employees / workers	%	0.14%	
				Complaints on POSH upheld	Nos.	56	

Sr. No.	Attribute	BRSR Core Parameter	Measurement	Unit	FY 24	Comments
Attribute 7	Enabling Inclusive Development	Input material sourced from following sources as % of total purchases – Directly sourced from MSMEs/ small producers	In % terms – As % of total purchases by value (Directly sourced from MSMEs/ small producers)	%	11.58%	
		% of total purchases – Directly sourced from MSMEs/ small producers and from within India	In % terms – As % of total purchases by value (Directly from within India)	%	93%	
		Job creation in smaller towns – Wages paid to persons employed in smaller towns (permanent or non-permanent /on contract) as % of total wage cost	Rural	%	Nil	
			Semi-Urban	%	Nil	
			Urban	%	Nil	
Metropolitan	%		100%			
Attribute 8	Fairness in Engaging with Customers and Suppliers	Instances involving loss / breach of data of customers as a percentage of total data breaches or cyber security events	In % terms	%	0	
		Number of days of accounts payable	(Accounts payable *365) / Cost of goods/services procured	days	40.4	
Attribute 9	Open-ness of business	Concentration of purchases & sales done with trading houses, dealers, and related parties Loans and advances & investments with related parties Loans and advances & investments with related parties	Concentration of purchase	a. Purchase from trading houses as % of total purchase	Not Applicable	
				b. Number of trading houses where purchases are made from	Not Applicable	
				c. Purchases from top 10 trading houses as % of total purchase from trading houses	Not Applicable	

Sr. No.	Attribute	BRSR Core Parameter	Measurement	Unit	FY 24	Comments
			Concentrations of sales	a. Sales to dealers/distributors as % of total sales	4.03%	
				b. Number of dealers/distributors to whom sales are made	1,635	
				c. Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	28.27%	
			Share of RPTs in	a. Purchases (purchases with related parties/total purchase)	0.10%	
				b. Sales (Sales to related parties/total sales)	0.02%	
				c. Loans and advances (Loans and advances with related parties/total Loans and advances)	0.00%	
				d. Investments (Investments to related parties/total Investments made)	0.00%	

Annex II

Sites selected for audits

S. No	Site	Location
1.	Corporate office	Noida
2.	India Offices (onsite)	Chennai, Bangalore, Madurai, Pune, Lucknow
3.	International Offices (Remote audit)	Canada-Mississauga, ON-7125 Mississauga Rd Canada-Vancouver, BC-580 Granville Street Mexico-Guadalajara-Minerva-Av Vallara M Mexico-Guadalajara-Vista-Av Acueducto USA-Cary, NC-Cary2-200 Regency Woods Lane USA-Jersey City, NJ-8F, 1 Evertrust Plaza USA-Frisco, TX-2401 Internet Boulevard UK-London-3F & 6F, 70 Gracechurch Street UK-Watford-1F-2F, 45 Clarendon Road Philippines-TaguigCity-CampusAvT3 Philippines-TaguigCity-CampusAvT4