

HCL Procurement Policy

Objective

Trust and Transparency are two of HCL's core values. These core values, coupled with our obligations to our customers, suppliers, employees, and communities form the foundation of this Procurement Policy. This policy will ensure that the appropriate controls, processes, and fiduciary rigor are applied in all HCL's purchasing of goods and services.

Scope

This policy applies to all purchasing of goods and services in support of HCL's internal business operations or in support of providing goods and services to HCL's customers.

Applicability

This policy applies to all Partners/Suppliers and stakeholders of HCL Technologies LTD. and all its worldwide subsidiaries ("HCL"). By default, all acquired entities will be governed by this policy unless HCL declares otherwise.

Policy Guidelines

All suppliers must review and abide by our Code of Business Ethics and Conduct policy (COBEC) and our Anti-Bribery and Anti-Corruption policy (ABAC). These guidelines set forth the minimum standards and practices that HCL's suppliers are required to uphold. For more details, please visit our policy document using below URL: <https://www.hcltech.com/investors/governance-policies>

Guiding Framework

HCL supports the United Nation Global Compact's Ten Principles in the areas of human rights, Labor, environment, and anti-corruption. HCL is committed to embed these principles in its strategy, culture, and value chain. All the Partners/Suppliers and stakeholders of HCL Technologies LTD are expected to operate in accordance with this Policy and adhere to all applicable laws and regulations.

1) Human Rights and Labor

a. Prevention of Forced and Child Labor

Suppliers shall prohibit use of child Labor at any stage of their business process. Under no circumstances, suppliers will employ any person below the age of 15 (or as per local law, whichever is greater). The suppliers must strictly refrain from forced Labor, human trafficking or modern-day slavery.

b. Compensation and working hours

Subject to all local laws and regulations, workers are not required to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. **Fair**

c. Wages

All workers are provided with a total compensation package that includes wages, employer's operations. overtime pay, benefits and paid leave which meets or exceeds the legal minimum standards or appropriate prevailing industry standards, whichever is higher, and compensation terms established by legally binding collective bargaining agreements are implemented and adhered to.

d. Freedom of Association and Employee Representation

Subject to all local laws and regulations, all workers have the right to form and join organizations of their own choosing without prior authorization.

e. Equality of Treatment

All workers are treated with respect and dignity. There is no discrimination in access to employment, training and working conditions, on grounds of race, color, sex, age, religion, political opinion, national extraction, sexual orientation, disability, or social origin.

2) Environment

In all applicable cases Suppliers should be able to demonstrate environmental policies and management systems sufficient to ensure continuous improvement in environmental performance. Suppliers should be able to demonstrate at any point:

- a) Ability to monitor and review environmental performance
- b) Awareness of potential environmental risks inherent in their production, service, or sourcing activities
- c) Implementation of mechanisms and processes in place to mitigate or minimize potential environmental risks
- d) Degree to which products and services have been designed with environmental considerations in mind.

Suppliers should seek to:

- a) Minimise the use of energy, water, and raw materials where practical
- b) Maximise the use of recyclable and renewable materials including energy where possible
- c) Make practical efforts to minimise waste and dispose of it in a safe, efficient, and environmentally responsible manner in line with the local laws.
- d) Avoid contamination of the local environment and ensure that emissions, air, noise and odour pollution is, as a minimum, within nationally defined limits.

Commitment to Health and Safety: Suppliers must provide clean, safe and healthy working environment for all employees and contractors. Suppliers must comply with all applicable, legally mandated standards for workplace health and safety in the countries in which they operate or engaged and HCL encourages Suppliers to implement industry best practices.

3) Anti-corruption

a. Prohibition on Corrupt Behavior

Suppliers must operate with honesty and integrity. Suppliers must not engage in bribery, corruption, paying kickbacks, acting unethically, or giving anything of value to secure an unfair advantage, whether in dealing with the organization or an individual. Suppliers must not engage in any unethical business activity or arrangements with any HCL employee.

Other Guiding Principles

a. Confidentiality

Suppliers shall safeguard confidential, proprietary, and sensitive information or data at all times and shall not disclose the same. The information provided by HCL should be used only for its intended and designated purpose as decided and agreed upon between HCL and the supplier.

b. Anti-competitive and restrictive trade practices

Suppliers promote free and fair competition and to get business by offering competitive prices and innovative products and services.

c. Local Community Development

Suppliers should ensure that an effective communication channel with local communities is maintained, and appropriate mechanism is established for raising and resolving grievances received from local community.

Supplier Onboarding

All partner/supplier onboarding require prior Due Diligence and approvals as per HCL's Standard Operating Procedures and approval process.

Due Diligence

HCL will evaluate the appropriateness of each supplier prior to onboarding. Depending on the specific goods / services, this may include reviewing their financial strength, ownership, customer set, scope of business, geographic coverage, corporate social responsibility, sustainability, employee health and safety record, reputation, reference checks, and other business requirements. Suppliers will be reviewed on a periodic basis under our Supplier Performance program.

Conflicts of Interest

No sourcing award will be granted to an entity for which a member of the "selection team" or their family members have a vest interested. If there is any ambiguity, the concern should be raised to the procurementconcerns@hcl.com mailbox.

Customers as Suppliers

HCL may award business to suppliers who are current or prospective customers.

Supplier Diversity

Consistent with both HCL's vision as a socially responsible business and our position in the global marketplace, HCL supports the development of and will give special consider to small, local, and diverse businesses. The definition of "diverse" is often specific to the country, however, it typically will include local minority, gender, veteran, sexual orientation, disability, economically disadvantaged, and other under-represented segments of a population.

Blacklisted Suppliers

At times, existing suppliers may be suspected of questionable activities, practices, or ethics. In consultation with Internal Audit, the HCL's Chief Procurement Officer may determine to temporarily or permanently "blacklist" a supplier. A blacklisted supplier will be prohibited from receiving new business from HCL and all current business will be terminated as soon as possible.

Sourcing

All sourcing awards require approval from Procurement and Functional team as defined in our SOPs and approval process.

Competition

Transparent and auditable competition is crucial to validating and ensuring that HCL receives the most value from its purchasing transactions while being consistent with this and other policies. This doesn't always mean that the lowest bid is selected, but that the one which appropriately balances cost, value, risk, quality, speed, availability, and other qualitative factors is chosen.

Supplier Negotiations

In order to maintain the sanctity of the negotiation process, all commercial discussions between HCL and a supplier must be conducted by Global Procurement Services (GPS) organization. Sourcing artifacts are required to be maintained and stored for post-award review, as defined in the SOPs.

Compliance with Applicable Laws and Regulations

Suppliers must operate in full compliance with all applicable laws and regulations of the country and locale in which the supplier engaged. Supplier will comply with the requirements of any applicable laws, statutes and regulations relating to the provision of the Services and comply will all applicable laws relating to health and safety, environment, data privacy, personal data, trans-border data flow and data protection.

Approvals

As a mandate, suppliers are expected to follow "No PO No Work" policy of HCL. No services or goods should be delivered without valid Purchase Order or signed contract irrevocably committing HCL to the transaction in question. Prior to the commencement of any service, delivery of any goods, or HCL incurring any financial obligation, approval will be required as per our approval process.

Contracts / Signature

For certain transactions, Purchase Orders must be supplemented by a signed agreement (“Contract”). Templates, guidelines, and checklists may be developed for specific purchasing scenarios, countries, and / or categories, known as Contracting Standards. All Contracts must be approved by General Counsel and Procurement as per our approval matrix.

Performance Management / Auditing

Suppliers will be evaluated periodically depending on several factors such as criticality, business volume, maturity, customer requirements, and / or past performance. They will be assessed across several dimensions such as their account management, service delivery, quality, pricing, invoicing practices, contracting practices, innovation, and / or other important aspects. In addition, suppliers may be audited to ensure compliance and adherence to their contractual obligations. HCL may conduct announced or unannounced on-site inspections at supplier premises to monitor compliance with the Policy guidelines. Suppliers must maintain all documentation necessary to demonstrate compliance with the Procurement Policy on site and cooperate with HCL employee or third-party monitoring firms in connection with such inspections.

Who Should I Contact for any Concern?

HCL is committed to help Suppliers and Partners comply with policies and processes. We periodically review this policy to evaluate its relevance, to monitor compliance and to drive continuous improvement. HCL welcomes feedback and encourages dialogue with any interested party. In case your organization have any question or concerns/grievances regarding policy or guidelines, you may post your concerns at procurementconcerns@hcl.com . This will be reviewed and addressed appropriately