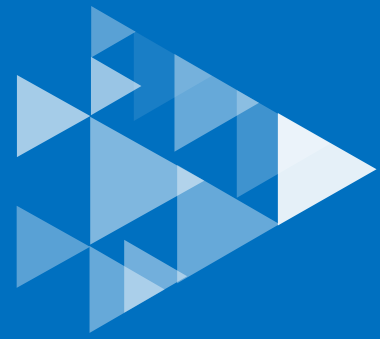


Human Rights Policy

**Objective:**

HCL Limited (together with its subsidiaries, “the Company”) is committed to ensuring that people are treated with dignity and respect. It is the philosophy of the Company to identify, prevent, and mitigate human rights violations resulting from, or caused by our business activities, through human rights due diligence and mitigation. The Company is committed to investigating, addressing, and responding to the concerns of employees and to taking appropriate corrective action in response to any such violations.

Consistent with that commitment, this Human Rights Policy (“Policy”) articulates the Company’s responsibility to respect all applicable employment, labour and human rights laws and regulations as well as internationally proclaimed human rights. In implementing this Policy, the Company is subject to the applicable laws of the jurisdictions in which we carry on our business.

This Policy will be reviewed annually with respect to its suitability and effectiveness, and the Company will provide regular, objective monitoring and reporting on our human rights progress. We welcome feedback and dialogue with interested parties. All feedback and comments on this Policy should be sent to the Policy team.

Applicability:

This Policy is applicable to all employees, officers and directors of the Company, including but not limited to full-time, part-time, fixed term and/or expat employees, whether they are working at the Company’s premises or at any other location, including working remotely (“Employees”). In addition, the Company seeks to do business with stakeholders, agents, consultants, contractors, suppliers, interns, apprentices and other third parties who must act in a manner consistent with this Policy (“Individuals”).

Employees and Individuals are required to become familiar with this Policy and conduct themselves honestly, ethically and in compliance with applicable laws, regulations, standards and the Company’s policies. Furthermore, Employees and Individuals are required to certify, upon joining or contracting with the Company and annually thereafter, as to their compliance with this Policy.

Policy Details:

The Company values diversity and believes in having a long-standing commitment to providing equal opportunity and intolerance of discrimination and harassment at the workplace or at work. The Company is dedicated to maintaining a workplace that is free from discrimination or harassment on the basis of race, religion, sex (including pregnancy, childbirth or related medical conditions, and breastfeeding), colour, age,

national origin, marital status, sexual orientation, military and veteran status, citizenship status, medical condition, disability and/or any other status protected by law (“Protected Status”).

The Company and all Employees/Individuals must continue to respect, support and promote human rights. We confirm that:

- The Company conducts business in a manner that respects the rights and dignity of all, complying with all legal requirements.
- The Company respects internationally recognized human rights. This Policy is aligned with the United Nations Declaration of Human Rights, the two International Covenants making up the International Bill of Human Rights, the International Labor Organization’s Declaration of Fundamental Principles and Rights at Work, the United Nation’s Guiding Principles on Business and Human Rights, and the United Nation’s Global Compact.
- The Company respects the rights of Employees and Individuals to practice their legitimate right of free association. The Company will cooperate in good faith with the bodies that its Employees and Individuals collectively choose to represent them within the appropriate legal frameworks.
- The Company respects the rights of people in communities impacted by its activities. The Company will seek to identify adverse human rights impacts and take appropriate steps to avoid, minimize and/or mitigate them.
- Where the Company identifies that it has caused or directly contributed to adverse impacts on the human rights of others, it shall provide for, or cooperate in the remediation of the adverse impacts through legitimate process.

This Policy focuses on fostering an open and inclusive workplace that upholds all human rights and includes the following components:

- Respect for Human Rights;
- Valuing Diversity;
- Being an Equal Opportunity Employer;
- Ensuring a Safe and Healthy Workplace;
- Workplace Security; and
- Other Policies.

Respect for Human Rights

The following are the basic human rights that shall be granted, to ensure a safe and healthy work environment:

- Right to safety;
- Right to be heard;
- Right to be informed; and
- Right to be redressed.

Valuing Diversity/Being an Equal Opportunity Employer

Regardless of personal characteristics or status, the Company does not tolerate disrespectful or inappropriate behaviour, unfair treatment, or retaliation of any kind. Harassment is unacceptable in the workplace and in any work-related circumstance outside of the workplace.

The Company endeavours to promote equality of opportunity and eliminate discrimination in the planning and delivery of services. In particular, it endeavours to treat all potential candidates, Employees and Individuals equally without regard to their Protected Status. The Company shall ensure that all Employees and Individuals have equal opportunity and a transparent environment to participate in the democratic process of the Company.

The basis for recruitment, hiring, placement, development, training, compensation, and advancement at the Company is qualifications, performance, and experience. The Company expresses its commitment to do business with ethical values and embrace practices that supports environment, human rights, and labour laws.

The Company further provides equal opportunities in employment, upgrading, promotion or transfer, recruitment or recruitment advertising, layoff or termination, wages or other compensation, selection for training, including apprenticeship or pre-apprenticeship.

Safe and Healthy Workplace

The Company strives to provide a safe and healthy workplace and complies with applicable international health and safety regulations, the applicable laws of the jurisdiction the Employees/Individuals work in and internal requirements. The Company is dedicated to maintaining a productive workplace by minimizing the risk of accidents, injury and exposure to health risks. The Company is also committed to engaging its Employees to continually improving health and safety in the workplace, including the identification of hazards and remediation of health and safety issues.

Workplace Security

The Company is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions. Security safeguarding for the workplace is provided as needed, while ensuring that Employees and Individuals' privacy and dignity are maintained. All Employees/Individuals are accountable for reporting concerns or perceived violations of this Policy and ensuring that the workplace is free from unsafe or disruptive conditions.

Other Policies

- Child Labor/Minimum Age/Bonded/Forced Labor/Abolition of Forced labor/Worst Forms of Child Labor;
- Freedom of Association and Protection of the Right to Organize/Right to Organize and Collective Bargaining;
- Prevention & Redressal of Sexual Harassment;
- Anti- Bribery & Anti-Corruption; and
- Equal Opportunity.

Employees and Individuals can access these Policies and other relevant Policies in the Policies Hub on myhcl.com.

How to raise a concern?

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 to one of the following:

- Their Reporting Manager;
- Human Resources;
- The Whistleblower Committee via whistleblower.hcl@com; and/or
- Risk and Compliance team via risk@hcl.com.

It is always advisable for Employees and Individuals 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. The Company is 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.

Implementation:

Awareness amongst Employees and Individuals is fundamental to ensuring that the objectives of this Policy are met and the Company is committed to training and communicating its approach to human rights as part of the implementation of this Policy.

The Company is accountable for ensuring this Policy is effectively implemented and all Employees and Individuals engaged in activities under the Company's control are responsible for the application of this Policy

As this Policy is a key component of the Company's commitment to ensuring that people are treated with dignity and respect, any violation of this Policy by an Employee or Individual may result in serious disciplinary action - up to and including termination where permitted by law. In appropriate cases, the Company may also refer misconduct to the proper authorities for prosecution. This may subject people involved to civil and/or criminal penalties.