

Human Rights Policy - India

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Revision History:

Version	From	To	Description	Author	Approved By
1	15 May 2018	04 Feb 2020	First Copy	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
2	05 Feb 2020	14 Nov 2021	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
3	15 Nov 2021	14 Jun 2023	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
4	15 Jun 2023	-	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head

Objective:

HCLTech 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.

Applicability:

HCLTech practices are guided by the inherent philosophy which is to promote human rights, create an environment where individuals are respected, treated equally, and ensure that no individual or group of individuals in the Company engages in activities that directly or indirectly violate human rights. This Policy is applicable to all employees of HCL Technologies Limited and its subsidiaries (herein referred as “HCLTech” or “the Company”), including but not limited to full-time/ part-time/ fixed-term/ expat employees. The benefits of this policy will also extend to all associates, stakeholders, ad-hoc, daily wagers, temporary staff, on-contract staff (direct & indirect employees), clients, consultants, trainees, apprentices and/ or interns employed by the Company and also all visitors to HCLTech (herein referred as “individuals”).

PolicyDetails:

The Company values diversity and believes in having a long-standing commitment to provide equal opportunity and intolerance of discrimination and harassment at the workplace or at work. HCLTech is dedicated to maintain a workplace that is free from discrimination or harassment on the basis of race, color, religion, creed, marital status.

HCLTech and all its employees/individuals must continue to respect, support and promote the human rights. We confirm that:

- HCLTech conducts business in a manner that respects the rights and dignity of all, complying with all legal requirements.
- HCLTech respects internationally recognized human rights, as set out in the International Bill of Human Rights and the International Labour Organization’s declaration on Fundamental Principles and Rights at Work.
- HCLTech treats everyone who works for the Company fairly and without discrimination. Our employees, agency staff and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity.
- HCLTech respects the right of employees to practice their legitimate right of free association. HCLTech will cooperate in good faith with the bodies that its employees collectively choose to represent them within the appropriate legal frameworks.
- HCLTech respects the rights of people in communities impacted by its activities. HCLTech will seek to identify adverse human rights impacts and take appropriate steps to avoid, minimize and/or mitigate them.
- Where HCLTech identifies that it has caused or directly contributed to adverse impacts on the human rights of others, HCLTech 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:

1. Respect for Human Rights
2. Valuing Diversity
3. Safe and Healthy Workplace
4. Workplace Security
5. Equal Opportunity Employer
6. Other Policies

1. 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
- Right to be redressed

1. Valuing Diversity

Regardless of personal characteristics or status, the Company does not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is unacceptable in the workplace and in any work related circumstance outside the workplace. HCLTech endeavors to promote equality of opportunity and eliminate discrimination in the planning and delivery of services. HCLTech shall ensure that all employees have equal opportunity and 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. HCLTech expresses its commitment to do business with ethical values and embrace practices that supports environment, human rights, and labor laws.

1. Safe and Healthy Workplace

The Company strives to provide a safe and healthy workplace and complies with applicable health & safety regulations and internal requirements. HCLTech is dedicated to maintain productive workplace by minimizing the risk of accidents, injury and exposure to health risks.

HCLTech is also committed to engage its employees to continually improve health and safety at workplaces, including the identification of hazards and remediation of health and safety issues.

1. Workplace Security

The Company is committed to maintain a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions. Security safeguard for workplace is provided as needed, while ensuring that employee privacy and dignity is maintained.

1. Equal Opportunity Employer

HCLTech is an Equal Opportunity Employer and endeavours to treat all potential candidates and employees equally without regard to their race, religion, sex, color, age, national origin, marital status, sexual orientation, medical condition, disability etc.

HCLTech 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, pre-apprenticeship etc.

6. Other Policies

Child Labour/ Bonded/ Forced Labour:

HCLTech prohibits child labour, bonded or forced labour, Human slavery or Human Trafficking. The standards are guided as set by the laws of the land. Any act notified defying the above stated norms shall be liable for disciplinary actions as per the law of the land.

We are committed to remedying any instances of child labor. Any instance of child labor can be reported to Global Ethics Helpline. Employees based out of Germany/Netherlands shall continue to use the Smart Service Desk for HEAR complaints/write to hear@hcl.com. Path: MyHCLTech >>Top Ribbon (Main Menu)>> Ethics Helpline

If any instance of child labor reported to us, immediate steps will be taken to verify the age of the individual against our official records/ documentary evidence.

If a child worker is found working, HCLTech will follow below steps:

- Act quickly and appropriately by removing the worker from their work area to ensure their safety.

- Record the names, ages and contact details of the workers concerned.
- Explain the legal requirements and restrictions on working ages to the child clearly and carry out an age verification check
- Consult with child focused organizations/ NGOs and inform local authorities as applicable
- Terminate the employment relationship
- Treat each situation of child labour on a case-by-case basis to ensure the best interest of the child is kept in mind while creating a remediation plan.

A full investigation will be carried out to identify how this has happened and action taken to prevent reoccurrence.

Prevention & Redressal of Sexual Harassment - All Employees and individuals must conduct themselves so as to ensure a work environment that promotes respect and upholds the dignity of every employee and individual at the workplace and does not become the cause of any physical or mental harassment. This term and act of “harassment” includes, but is not restricted to unwelcome behavior whether through visual displays, verbal, non-verbal, physical or other conduct making a person submit to requests, favors, threats or demands that alter or threaten to alter the terms of employment and interfere with work conditions.

If any employee/ individual believes that he/ she has been harassed in any manner at workplace or at work (office parties, work-related social functions, phone calls, sending messages through cellular phones or email from home even on an off day, or other contacts outside office hours and work-related interactions) he/she has the right to submit a complaint as per our applicable policy at Global Ethics Helpline. Employees based out of Germany/Netherlands shall continue to use the Smart Service Desk for SECURE complaints/write to secure@hcl.com. Prevent and prohibit all and any acts of harassment, including sexual harassment, in order to ensure a safe and healthy work environment. Path: MyHCLTech >>Top Ribbon (Main Menu)>> Ethics Helpline

You may refer to the ***Prevention & Redressal of Sexual Harassment at Workplace Policy*** for details regarding scenarios, circumstances, responsibilities and the procedure for filing a complaint.

Employees can raise concerns by submitting their grievance in the Global Ethics Helpline. Employees based out of Germany/Netherlands shall continue to use the Smart Service Desk for HEAR complaints/write to hear@hcl.com. Path: MyHCLTech >>Top Ribbon (Main Menu)>> Ethics Helpline

Anti- Bribery & Anti-Corruption- An organizational environment which is affected by corruption may in turn lead to instances wherein an employee’s rights might be curbed. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for HCLTech or under HCLTech’s control. Employees are required to avoid any activity that might lead to, or suggest a breach of this Policy since it may lead to instances violating the Human rights aspect.

A bribe may be anything of value and not just money such as: gifts, inside information, sexual or other favors, corporate hospitality or entertainment, offering employment to a relative, payment or reimbursement of travel expenses, charitable donation or social contribution, abuse of function and can pass directly or through a third party. Corruption includes wrongdoing on the part of an authority or those in power through means that are illegitimate, immoral, or incompatible with ethical standards. Corruption often results from patronage and is associated with bribery.

How to raise a concern?

Employees/ individuals are encouraged to raise concerns about any issue regarding or suspicion of malpractice at the earliest possible stage. In case of any ambiguity if a particular action constitutes bribery or corruption or any other related query, such concerns must be raised with Reporting Manager and/or the Global Ethics Helpline. Employees based out of Germany/Netherlands shall continue to raise their grievance by writing to whistleblower@hcl.com.

However, it is always advisable for Employee/ individuals to submit a written complaint narrating the true sequence of the events leading to the violation along with any supporting evidence. The Company is

committed to keep the identity of the reporting Employee/ individuals confidential to the maximum extent as consistent with the Company's legal obligation but subject to the Company's need to investigate reported violations.

Besides the above, the Employee may choose to report to - **risk@hcl.com**

For details of other policies that covers various aspects of this Policy, please refer :

MyHCLTech > Policies Hub > Policy for Prevention and Redressal of Sexual Harassment at workplace (Secure)/ Whistleblower Policy/ Code Of Business Ethics and Conduct/ Anti-Bribery and Anti- Corruption Policy/Disciplinary Policy/Equal Opportunity Employment Policy.