

Norwegian Transparency Act Statement

The scope of this statement covers all our operations worldwide,
including those of our subsidiaries.

About HCLTech

Established in 1976 as one of India's original IT garage start-ups, HCL is a pioneer of modern computing with many firsts to its credit, including the introduction of the 8-bit microprocessor-based computer in 1978 well before its global peers. Today, the HCL enterprise has a presence across varied sectors that include technology, healthcare and talent management solutions and comprises three companies – HCL Infosystems, HCLTech and HCL Healthcare. The enterprise generates annual revenues of over US \$13.1 Billion global technology firm with over 224,756 professionals operating from 60 countries.

Over the years, HCL has conscientiously set high business standards by way of providing sustainable, world-class products, solutions and services; a feat that has helped the organization touch the lives of millions with possibilities.

For more information kindly see [HCLTech's Annual Report 2022-23 | HCLTech](#)

HCL holds a core belief that the connectivity and technology we offer are beneficial to society and can bolster human rights, and we recognize the accountability that accompanies this. The preservation of human rights is a multifaceted issue that encompasses not just the technology we offer, but also our partners, suppliers, and our own operations. As such, we are committed to ongoing learning and enhancement, and we are convinced that collaboration with a wider community of stakeholders is the optimal approach. Our Human Rights policy, which is accessible online, addresses the most significant risks associated with the potential misuse of our technology. Policies concerning other aspects of human rights, such as fair labor practices, modern slavery and human trafficking, and environmental responsibility, are governed by other governance policies.

[Human Rights policy | HCLTech](#)

[Governance Policies | HCLTech](#)

Our Principles & Policies

HCLTech is committed to being open and transparent about how we conduct our due diligence and promote fundamental human rights and decent working conditions. Furthermore, HCLTech is committed to the elimination of modern slavery and human trafficking within our business and our supply chain. HCLTech's Procurement function directs our activities and our relationships with suppliers in accordance with many internal and external ethical guidelines. These guidelines and policies serve as a point of reference for upholding fundamental human rights as well as working conditions, occupational health and safety, business ethics, and environmental law. The policies are reviewed regularly to ensure they remain relevant and fit for purpose in a market leading global company. They include:

- **Code of Business Ethics & Conduct (COBEC):** This code explains the manner in which we behave as an organization and how we expect our employees to act. It includes a commitment to comply with all employment and labour laws, including those related to the elimination of all forms of forced and compulsory labour (including child labour). We require all employees to sign the CoBC.
- **Recruitment Policy:** We operate a robust employment policy, including conducting eligibility to work in a particular location and checks for all employees and contractor provided personnel to safeguard against human trafficking or individuals being forced to work against their will in high risk areas.
- **Whistleblowing Policy:** We operate an independently provided whistleblowing procedure where all employees know and are made aware that they can raise concerns without fear of reprisals about the treatment of colleagues or of practices within our business or supply chain.
- **Supply Chain Policy:** This policy reflects our commitment to ensure socially and environmentally responsible sourcing across its global supply chain. We recognize that sourcing materials and services on a worldwide basis has a broad impact and comes with responsibilities that span beyond our own operations.
- **UN Global Compact:** We are a longstanding signatory to the United Nations Global Compact and support its drive for sustainability, human rights and social dimension of corporate responsibility.

Our supply chain

Our operations are supported by a global supply chain for goods and services. This supply chain includes suppliers of goods, technology related products and services, software and skilled labour. HCL's contracts with all suppliers explicitly cover aspects relating to the adherence to Modern Slavery Act 2015. We expect all our suppliers to comply to the provisions laid out in the act to ensure that all facets of human integrity are upheld, thereby aiding in eradicating Human trafficking. We would also like to strongly uphold that we have zero tolerance for non-adherence to this aspect and any act of violation reported shall be duly acted upon as per the prevailing legislations.

While our supply chains are global, the majority of our supplier relationships are long-term and stable, allowing HCLTech to consistently communicate and influence our expectations for performance and good practices.

Compliance and Training

HCLTech has a dedicated Compliance Team who is responsible for ensuring that the Code of Business Ethics & Conduct is adhered to and can also give advice and direction to local employees on ensuring that our policies and principles are appropriately implemented. In addition, we require our all our employees to undertake regular compliance training on a variety of important compliance topics including how to spot and raise any issues (including Modern Slavery) both internally and within our supply chain. HCLTech has mandatory compliance training modules and tests that must be cleared by all employees annually and at the time of joining. We regularly send email reminders and supplemental training invites to bolster our commitment to it.

HCLTech believes these trainings are essential to further reduce the risk in our supply chain and we will look to repeat and expand such trainings in the future. We also provide copies of Supplier's Code of Conduct to our suppliers at the time of onboarding.

Continued improvement

We believe that our current systems and procedures are robust in identifying any evidence of modern slavery or human trafficking within our organization, and that this risk remains low. Nevertheless, we recognize the need to continue to monitor, improve and enhance our tools and procedures on this complex subject.

Inquiries

If you have any questions about how HCLTech addresses and manages fundamental human rights and decent work conditions, please send your enquiry in writing to: rosariopj@hcltech.com

HCL Norway is 100% wholly owned step-down subsidiary of HCLTech and all policies of HCLTech - the parent company apply to its subsidiaries as well, subject to local legal & compliance requirements.

The Board of Directors of HCL Technologies Norway AS has approved this statement for the financial year ending on March 31, 2023.



Goutam Rungta, Director
For and on behalf of HCL Technologies Norway AS

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Progress™

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