

HCL Technologies Romania NFRD Report 2023

This report is issued in alignment with the European Union (EU) Non-Financial Reporting Directive (NFRD) 2014/95/EU. This report includes summary information on sustainability initiatives of HCL Technologies, Romania. For the purposes of this report, "we," "us," "our," and similar terms refer to HCL Technologies Romania, unless the context indicates otherwise.

Introduction

HCLTech, with its presence in 60 countries and team members from 161 nationalities, is rapidly growing in longstanding locations like India and more recently in Eastern Europe and Central America.

As an IT services provider facilitating sustainable transitions across industries, HCLTech plays a pivotal role within the EU Green Taxonomy framework for eligible activities. Within the Information Technology and Communications sector, activities are primarily categorized as enabling activities or transitional. Through optimization, monitoring, complex calculations, AI and real-time data analytics, IT possesses the capability to enhance company infrastructure and streamline business processes, thereby optimizing energy and resource usage. IT solutions empower clients to reduce carbon emissions and conserve natural resources by delivering precise real-time data and enabling companies to efficiently utilize only the necessary amount of power and resources required for operations.

HCLTech has a robust workforce in Romania, with nearly 900 employees in five offices across the country. While our presence is currently heavily weighted towards Iasi and Bucharest, we are looking to expand our footprint, leveraging our company's strong global commitment to establishing and nurturing organizations that celebrate diversity and prioritize hiring locally. HCLTech Romania remains true to that vision, with almost 98% of our workforce being local and 46% female professionals. Furthermore, HCLTech has been repeatedly recognized as a Global Top Employer, including in 2024, and was just certified as the #2 Employer in Romania by the Top Employers Institute.

- More than 30+ clients in multiple industries such as manufacturing, retail, energy, printing, banking and e-commerce have chosen HCLTech to be their partner.
- To keep our fingers on the pulse of innovation, HCLTech has partnered with top universities and tech communities.

For more details, please go to: [HCLTech Romania: Supercharging Progress | Digital, Engineering and Cloud](#).

Details of the entity

Legal Name	HCL Technologies Romania S R L
Registered Office Address	TN Offices 2, 1st floor, Timpuri Noi Square, Sector 3, 165 Splaiul Unirii, Bucharest, Romania, 030133P
Reporting Period	January 1, 2023 – December 31, 2023
Name and contact details of the person who may be contacted in case of any queries	Iulian Paduraru Country Head, Romania iulian.paduraru@hcltech.com

Sustainability Strategy

To maximize our contribution towards the United Nations Sustainable Development Goals (SDGs) we have woven sustainability into our business strategy with three objectives in mind: to meet our own sustainability goals, help our clients achieve their sustainability goals and create a positive impact for all stakeholders.

These objectives are underpinned by our three guiding principles:

Act: Acting in the most responsible and sustainable manner and ensuring every resource is used efficiently to maximize value.

Pact: Working for a sustainable future in collaboration with our clients, partners, communities and all stakeholders.

Impact: Focusing on creating sustainable impact through all initiatives and activities.

We believe that sustainability is an ongoing journey that requires continuous improvement and adaptation. As part of our commitment to transparency and stakeholder engagement, we regularly review our material topics to ensure they remain relevant and responsive to the evolving needs and expectations of our stakeholders.

The 12 material topics were selected based on their significant impact on our business operations and the feedback we received from our stakeholders. During the finalization of the material topics, we conducted a diligent examination, employing a comprehensive bifocal lens that encompassed both risk and responsibility. This approach ensured that the process adhered to the principle of double materiality, considering the significance of these topics from multiple perspectives, both internal and external.

Material topics and risk evaluation

S.No.	Material issue identified	Explain risk or opportunity	In case of risk approach to adapt or mitigate	Financial implications of the risk/ opportunity (Indicate positive or negative implications)
1	Climate Change	We have evaluated physical and transition risks to HCLTech's business operations. Clients, partners, and investors are increasingly demanding reduced emissions and potential carbon taxes. However, HCLTech sees climate action as a responsibility.	HCLTech is committed to limiting greenhouse gas emissions to 1.5°C by 2030 and achieving net zero by 2040, with a clear roadmap. The company is investing in services to help clients and partners meet their climate change commitments and have identified projects to work with communities towards a climate resilient future.	The financial implications of climate change include increased operation costs and lost opportunity costs in the business environment, as highlighted in our sustainability report.

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		<p>We also have an opportunity to offer IT services to clients that can help reduce their carbon footprint, and we consider any of this opportunity lost as a risk.</p>		
2	Eco-Efficiency	<p>Eco-efficiency is an opportunity for HCLTech to improve process efficiency while minimizing environmental damage.</p> <p>HCLTech has implemented various energy efficiency initiatives to reduce energy consumption, water consumption and waste minimization.</p> <p>Water and waste can also be linked to social license to operate in the communities we operate.</p>	<p>HCLTech has established monitoring and governance systems covering all eco-efficiency parameters, which are reviewed, and budgets are allocated for investments leading to performance improvement.</p>	<p>The cost saved for operations is a financial opportunity for the Company, while the financial risk is any disruption to operations.</p>

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3	Human Capital	HCLTech defines human capital as the skills, knowledge, and experience of an employee or team that are valuable to the organization. Constant upskilling and reskilling are crucial for delivering top services to clients, especially as the digital technology space expands.	HCLTech has a clear institutional mechanism to map future skillset requirements and has programs for upskilling and reskilling employees. These are measurements used to gauge the performance of the initiative which are reviewed periodically	The financial implication is the risk related to quality of deliverables and loss of opportunity with clients.
4	Local Hiring	In prioritizing the recruitment of local talent, HCLTech not only embraces the best-in-class practices but also strategically enhances talent retention. This approach serves as a visible indicator of the company's commitment to the communities where it operates.	HCLTech has strategically broadened its office locations to encompass smaller cities, a move referred to as "New Vistas," while simultaneously implementing a hybrid workspace model to enhance opportunities for employees. This global initiative extends to investing in local talent within the countries where the company maintains a presence.	From a financial standpoint, the opportunity arises from the positive outcomes of enhanced talent retention, along with strengthened relationships with both the local community and clients.

S.No.	Material issue identified	Explain risk or opportunity	In case of risk approach to adapt or mitigate	Financial implications of the risk/ opportunity (Indicate positive or negative implications)
5	Diversity, equity and Inclusion (DEI)	The absence of robust DEI policies, could hamper an organizations ability to attract top talent. Recognizing the crucial role diversity plays in nurturing an innovative culture, the company emphasizes the importance of diverse thought, ideas, and perspectives. Ample evidence supports the notion that DEI fosters stronger interpersonal connections and positively impacts creativity, problem-solving, and overall organizational success, thereby contributing to the formation of a more resilient organization.	HCLTech has established comprehensive policies, processes, and governance frameworks to oversee the effectiveness of its DEI strategy. A dedicated DEI and ESG Committee within the Board ensures a strategic emphasis on these matters. Clear goals and targets are delineated and seamlessly integrated into the performance evaluation criteria for leaders. Additionally, a specialized team is tasked with spearheading various initiatives aimed at advancing the company's commitment to diversity, equity, and inclusion.	The potential presented can be assessed through the outcomes of fostering a more diverse and inclusive workplace. This evaluation may encompass metrics such as productivity, innovation, or talent retention.

S.No.	Material issue identified	Explain risk or opportunity	In case of risk approach to adapt or mitigate	Financial implications of the risk/ opportunity (Indicate positive or negative implications)
6	Talent attraction and retention	<p>Navigating the growing demand for fresh talent presents both a notable risk and a distinctive opportunity for HCLTech. The global trend toward digitalization has exacerbated the shortage of skilled labor. Nonetheless, the company perceives this as a chance to harmonize its workplace culture with prevailing global trends. By doing so, HCLTech aims to bolster employee loyalty and enhance efficiency.</p>	<p>HCLTech's strategic approach centers on cultivating the workplace of the future, characterized by a commitment to equality, fostering a collaborative and transparent culture, and implementing a comprehensive training strategy tailored to address the developmental requirements of employees across all hierarchical levels. The company ensures progressive career pathways for its employees, offering internal growth opportunities.</p>	<p>The inability to successfully attract and retain skilled professionals can lead to missed prospects for expansion and innovation, ultimately resulting in diminished productivity and competitiveness for HCLTech. Moreover, the substantial costs associated with recruiting, onboarding, and training new hires further underscore the importance of effective talent management strategies.</p>

S.No.	Material issue identified	Explain risk or opportunity	In case of risk approach to adapt or mitigate	Financial implications of the risk/ opportunity (Indicate positive or negative implications)
7	Work environment	<p>Recognizing the significance of the work environment, HCLTech prioritizes both emotional and physical well-being of its employees. The company integrates amenities such as well-designed workspaces, wellness areas, childcare facilities, and fitness centers into its office spaces. Equally important is fostering a safe environment where employees feel confident and supported in reporting any instances of discrimination or harassment.</p>	<p>HCLTech prioritizes employee comfort through thoughtful design and planning of its office spaces. The company maintains transparent policies and processes aimed at preventing discrimination and harassment within the workplace, which are regularly communicated to all employees. Encouraging a culture of accountability, employees are urged to promptly report any incidents they encounter. To proactively address issues, HCLTech employs tracking mechanisms to monitor and take preventive measures as necessary. Furthermore, the company ensures independent investigations of reported incidents to uphold integrity and fairness.</p>	<p>Creating a conducive work environment that fosters employee comfort and trust is integral to cultivating dedicated and committed staff at HCLTech. This emphasis on providing a healthy and safe workplace directly influences the financial performance, as it enables employees to perform to their fullest potential. Conversely, any incidents within the workplace have the potential to tarnish the organization's reputation, leading to missed opportunities and potential financial losses.</p>

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8	Citizenship	For HCLTech, corporate citizenship is not merely an opportunity but rather the foundation of the organization. It embodies the company's commitment and responsibility to the communities in which it operates.	The focus of HCLTech is underscored through initiatives of the HCL Foundation in India and various employee councils worldwide. These efforts not only benefit the recipients but also serve to showcase the company as a credible organization worthy of association.	Enhanced trust and credibility within the community can yield potential financial implications for HCLTech.
9	Sustainable impact on clients	Positioned as a frontrunner in IT services, HCLTech possesses a distinct advantage in guiding its clients toward innovation through cutting-edge technology and digitalization, all the while upholding principles of responsibility and respect. The company is actively engaged in collaborating with clients to develop numerous sustainable solutions.	At HCLTech, the ethos is grounded in the belief that any unexplored opportunity represents a potential risk. Consequently, the company has established a specialized team tasked with collaborating closely with sector leaders to pinpoint opportunities within the realm of sustainability. This dedicated team then develops tailored sustainability solutions for our clients.	The financial impact for HCLTech will be directly tied to the volume of new projects secured with clients. Indirectly, the company stands to gain from the accrued environmental and social capital resulting from these endeavors.

S.No.	Material issue identified	Explain risk or opportunity	In case of risk approach to adapt or mitigate	Financial implications of the risk/ opportunity (Indicate positive or negative implications)
10	Cyber security, data protection and system availability	Security and privacy: Remote working coupled with an expansion of the company's operations increases the risk of data breaches and noncompliance with data privacy, protection and regulations. Clients will be looking for enhanced privacy and security, something that we can provide based on our solution-oriented business model.	HCLTech ensures a globally interconnected oversight framework involving governance, policies, procedures, training and awareness programs, global privacy impact assessments, privacy by design, data mapping, third-party contractual oversight, incident management and a mechanism for monitoring regulatory compliance for every geography. Our Crisis & Resilience program showcases our focus on integrating resilience as an intrinsic part of our business operating model and seeks to embed "resilience by design" across the dimensions of work, workforce, workplace, business operations, technology, supply chain and leadership.	Any incident or regulatory findings can have a direct impact on that specific project with the client or on HCLTech as an organization. It may lead to regulatory implications, reputational challenges and financial implications.

S.No.	Material issue identified	Explain risk or opportunity	In case of risk approach to adapt or mitigate	Financial implications of the risk/ opportunity (Indicate positive or negative implications)
		<p>Business continuity: Given the complex and expanding network of services offered and spread of operations, there is a potential that our business may be affected due to disruptions materializing in our environment which could impact the availability or continuity of operations. System availability: This has a direct correlation with our productivity and impact on services offered to our clients.</p>	<p>Our Information and cybersecurity program ensures a strong security posture for HCLTech and our clients. Our security posture has been validated by independent, industry recognized certifications and attestation standards, including quarterly oversight by the Board. We also have cyber insurance that covers different types of breaches and cyber events.</p>	

S.No.	Material issue identified	Explain risk or opportunity	In case of risk approach to adapt or mitigate	Financial implications of the risk/ opportunity (Indicate positive or negative implications)
11	Sustainable Procurement	<p>We run our operations in an interconnected global value chain. Any disruption can create interruptions and related impacts. It can also be seen as an opportunity to create a potential positive environment and social impact with the right influence in the procurement process.</p>	<p>HCLTech has seamlessly woven sustainability into its procurement process by integrating sustainability criteria into its procurement policy. This includes incorporating an ESG due-diligence process for onboarding new vendors. Additionally, the company has conducted ESG risk assessments of its supply chain, identifying specific categories and vendors for audit. These audit requirements are seamlessly integrated into the Vendor Risk Management program.</p>	<p>Financial implications may arise from business continuity disruptions stemming from ESG non-compliance within the supply chain or reputation challenges that may ensue from such circumstances.</p>

S.No.	Material issue identified	Explain risk or opportunity	In case of risk approach to adapt or mitigate	Financial implications of the risk/ opportunity (Indicate positive or negative implications)
12	Governance and ethics	<p>Governance and Ethics form the bedrock of HCLTech's organizational culture. The company meticulously designs its governance structure to instill ethical behavior across all levels. This robust governance framework, coupled with a strong ethical culture, fortifies the company's sustainability over the long haul. As regulatory standards surrounding governance tighten, with increased emphasis on accountability, transparency, and fairness, HCLTech remains vigilant. The company is dedicated to staying abreast of both current and forthcoming regulations to ensure full readiness for any regulatory shifts.</p>	<p>HCLTech maintains a comprehensive framework of policies, processes, and systems to uphold ethical conduct and robust governance standards. At the core of this framework lies the Code of Business Ethics and Conduct (COBEC), which serves as the primary document guiding the behavior of HCLTech employees in their business dealings. The company also provides whistle-blowing channels and other reporting mechanisms to identify and address any challenges that may arise. Periodic reviews of these policies and practices are conducted by the Board through its Audit Committee.</p>	<p>Failure to comply with corporate governance regulations can result in numerous financial implications and damage to the company's reputation. Regulatory enforcement actions may result in penalties, fines, and legal costs, adversely affecting financial performance. Additionally, incidents that are not necessarily regulatory in nature but raise concerns about the company's ethical conduct pose a risk to its reputation and stakeholder trust.</p>

To track our performance against each of the material topics, we have identified Key Performance Indicators (KPI).

ESG Governance

HCLTech has formed the Environment, Social and Governance (ESG) & Diversity Equity Inclusion(DEI) Committee. This committee plays a pivotal role in guiding the company's initiatives aimed at promoting environmental sustainability, social responsibility, and fostering an inclusive workplace culture.

The committee comprises of 2 Independent Directors and the Chairperson of the board. The chair of the committee is an Independent Director.

Our governance is built on clear policies and appropriate due diligences.

(a) Environment

- **Policy:** We have a comprehensive Environmental Sustainability Policy that prioritizes energy efficiency, resource conservation and waste reduction. Our goal is to minimize our carbon footprint and contribute to a greener future.

Environmental and Sustainability Policy: <https://www.hcltech.com/sustainability#policies>

Energy Policy: <https://www.hcltech.com/sites/default/files/documents/sustainability/EnMS-Policy-2022.pdf>

Procurement Policy: <https://www.hcltech.com/sites/default/files/documents/Procurement-Policy.pdf>

Through our Water Policy, we are committed to meeting all applicable regulations and customers' compliance obligations on water. Moreover, we aim to undertake periodic water-risk management and avoid pollution of surface water, groundwater and other water resources.

Through our Environmental Policy, we are committed to minimize all types of waste, including e-waste, by adopting reduce-reuse-recycle-recovery philosophy.

- **Due Diligence:**
 - We have a ISO 14001 certified Environmental Management System functioning.
 - We have set clear goals and targets and monitor performance against these goals and targets.
 - The performance and progress are reviewed quarterly by the ESG committee of the board.

(b) Employees

- **Policy:** We are committed to creating a safe, healthy and inclusive work environment for all employees. We uphold fair labor practices, equal opportunities and employee well-being initiatives.

Code of Business Ethics and Conduct: <https://www.hcltech.com/investors/governance-policies/cobecpdf>

Occupational Health & Safety Policy:

<https://www.hcltech.com/sites/default/files/documents/sustainability/OHS-Policy-2022.pdf>

Whistleblower Policy: <https://www.hcltech.com/investors/governance-policies/whistleblowerpolicy.pdf>

Remuneration Policy: <https://www.hcltech.com/investors/governance-policies/rempolicy.pdf>

Human Rights Policy: <https://www.hcltech.com/sites/default/files/documents/inline-migration/human-rights-policy.pdf>

- **Due Diligence:**
 - We conduct regular independent third-party audits covering all elements of human rights.
 - We regularly conduct employee satisfaction surveys and implement programs to improve workplace well-being.
 - Our Occupational Health and Safety Management System is certified against ISO 45001.

(c) Social

- **Policy:** We recognize our responsibility to contribute positively to the communities we serve. We actively engage in social responsibility initiatives that address local needs.

CSR Policy: <https://www.hcltech.com/investors/governance-policies/csrapolicy.pdf>

- **Due Diligence:**
 - All CSR initiatives undergo regular internal and external audits.
 - All CSR projects undergo an impact evaluation exercise.

(d) Human Rights

1. **Policy:** We uphold the principles of the Universal Declaration of Human Rights and do not tolerate any form of human rights abuse within our operations or supply chain.

Human Rights Policy:

<https://www.hcltech.com/sites/default/files/documents/inline-migration/human-rights-policy.pdf>

Procurement Policy: <https://www.hcltech.com/sites/default/files/documents/Procurement-Policy.pdf>

2. **Due Diligence:**
 - We conduct regular assessments to identify potential human rights issues within our operations and supply chain.

The company ensures that all its operations adhere with the ethical principles of human rights and labour rights established by the UN, OECD, and ILO. It actively monitors human rights risks as an integral part of its risk management process, with a specific focus on the sustainability of purchases during the procurement stage.

Human Rights Policy focuses on respect for human rights, valuing diversity/anti-discrimination, safe and healthy workplace and security. There are adequate due diligence

process in place for human rights, in line with UNGP and OECD Guidelines for multinational enterprises.

The company or its management has not committed any violations of labour or human rights laws. HCLTech has not been contacted by an OECD National Contact Point, as there were no suspicions or accusations in this regard.

To ensure that all activities comply with legislation and internal regulations and procedures, and that these rules are respected by all employees and business partners, HCLTech has implemented a Whistleblower Program. No incidents of bribery/corruption occurred during the 2023 financial year.

(e) Anti-Corruption and Anti-Bribery

- **Policy:** We have a zero-tolerance policy for corruption and bribery. We conduct our business ethically and with transparency.

Code of Business Ethics and Conduct: <https://www.hcltech.com/investors/governance-policies/cobecpdf>

Anti-Bribery & Anti-Corruption policy: <https://www.hcltech.com/investors/governance-policies/abac.pdf>

Whistleblower Policy: <https://www.hcltech.com/investors/governance-policies/whistleblowerpolicy.pdf>

Fiscal governance is treated as an important element. HCLTech documents and accounts for financial aspects in accordance with relevant regulations. The company strictly complies with current fiscal legislation and has not been convicted of tax evasion or anti-competition law.

There is zero tolerance for corruption and bribery, as outlined in the Anti-corruption and anti-bribery Policy and in the Code of Business Ethics and Conduct.

- **Due Diligence:**
 - Our anti-bribery management system is certified against ISO 37001 and undergoes regular audits.
 - We provide regular anti-corruption training to all employees to ensure awareness of our policies and procedures.
 - We have a whistle blowing policy and any whistle blown is investigated and appropriate actions initiated.

Management across sustainability dimensions

Environment

One of humanity's greatest challenges is climate change. It is also one of the biggest long-term threats for any business. As an environmentally responsible Company, we recognize our significant role in contributing to global environmental sustainability and responsibly.

Our climate risk assessment process

Our process started with an initial assessment exercise to study which geographies will have a significant risk to impact our business from a climate risk perspective. This exercise narrowed down on 2 geographies which is India and US. All our other operations, including operations in Romania did not come out as significant from the initial assessment.

The assessment included evaluating the intensity of physical climate risks with different criteria such as:

- Criteria-1: Assets that are owned by the organization
- Criteria-2: Community assets (infrastructure and services)

We then conducted a comprehensive climate change risk assessment covering India and the US. As outlined by the TCFD, risks have been categorized into: (1) transition risks, linked to the transition to a low carbon economy and (2) physical risks linked to climate change.

The scenario selection was completed based on data sources from the Intergovernmental Panel on Climate Change (IPCC), the international Energy Agency's standard scenarios and a thorough internal stakeholder engagement.

Our mitigation initiatives propel us towards a more sustainable future include active pursuit of renewable energy solutions, energy efficiency measures and optimization around water and waste management practices. At HCLTech, we understand that these changes require dedicated investments that can foster innovation and deep collaboration. We recognize that no one has the full solution but that everyone is part of the solution.

HCLTech's Net Zero roadmap for 2040

We are outlining our strategy to cut HCLTech's greenhouse gas (GHG) emissions in half by FY30 compared to our baseline year of FY20 and achieve net zero emissions by 2040.

Key global goals under net zero roadmap

- 50% reduction in absolute Scope 1 and 2 emissions by FY30 from baseline year of FY20
- 80% of electricity usage to be from renewable energy by 2030
- 42% reduction in absolute Scope 3 emission by FY30 from baseline year of FY20
- Achieve zero waste to landfill at all owned facilities by FY25

Alignment with Science Based Targets Initiative (SBTi)

Our targets related to GHG emission reduction were validated by the SBTi to be aligned to a 1.5°C Pathway. For more information, please refer to our Annual Sustainability Report:

Environment Management System	Our environmental initiatives are not isolated acts but rather part of a company-wide, strategic framework that aligns with international standards to maximize our contribution to the United Nations Sustainable Development Goals (SDGs). We are certified to ISO 14001:2015 (Environmental Management System) and ISO 45001:2018 (Occupational Health & Safety Management System). We also hold ISO 50001 certification for our energy management system.
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Energy Consumed during Jan 2023 – Dec 2023		
Parameter	Unit	Performance
Total energy consumed	GJ	2,164.28

Greenhous Gas Emissions during Jan 2023 – Dec 2023		
Parameter	Unit	Performance
Total Scope 1 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 eq	1.45
Total Scope 2 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 eq	162.78

Water Consumption during Jan 2023 – Dec 2023		
Parameter	Unit	Performance
Water Consumed	Cubic meter	891.7

Waste Generation during Jan 2023 – Dec 2023		
Parameter	Unit	Performance
General Waste (kg) incl paper, plastic and glass	Kg	1,200

In our efforts to enhance sustainability and energy efficiency, we have installed a temperature and humidity control system in 2023. Specifically, our new system encompasses the installation of smart thermostat systems, an upgrade which aligns with best practices for building automation and control

systems, building energy management systems (BEMS) and energy management systems (EMS). Given that the temperature and humidity monitoring system is installed within the data center, the primary function of this system is likely to maintain optimal conditions for data processing equipment, thereby enhancing the overall energy efficiency of the data center operations. The monitoring system ensures that the data center operates under optimal environmental conditions, reducing energy consumption and preventing overheating or overcooling.

Employees

Our people possess exceptional talents and provide invaluable contributions. HCLTech's unwavering commitment to its workforce is exemplified through a range of comprehensive policies, programs and initiatives.

We strive to foster the culture of Diversity, Equity and Inclusion to continually create a positive working environment that promotes social performance improvement. We firmly believe that in the pursuit of supercharging progress sustainably and responsibly, the unwavering dedication of our people serves as the foundation for our successes.

Jan 2023 – Dec 2023 Headcount

Age Grouping	Gender	FTE	Contract	Grand Total
<30 Yrs	Female	136	5	141
	Male	128	53	181
30-50	Female	244	14	258
	Male	234	78	312
> 50	Female	9		9
	Male	12	3	15
Grand Total		763	153	916

Jan 2023 – Dec 2023 Hires

Age Grouping	Gender	FTE
<30	Female	35
	Male	49
<30 Total		84
30-50	Female	46
	Male	53

30-50 Total	-	99
>50	Female	2
-	Male	7
>50 Total	-	9
Grand Total	-	192

Differently abled Employees in Romania

Particulars	Total	Male	Female
Total Differently abled Employees	2	1	1
		50%	50%

Permanent Employees - Jan 23 - Dec 23		
Gender	Return to work rate	Retention rate
Male	(20/20) - 100%	(6/9) - 66.67%
Female	(66/73) - 90.41%	(40/50) - 80.00%
Total	(86/93) - 92.47%	(46/59) - 77.97%

Employee Engagement

There are a whole range of engagement channels with our employees. These include:

- Career support programs.
- Employee Assistant program.
- Employee Feedback on policies.
- Wellness sessions.
- Training programs and learning nuggets – functional and cultural (Eg. Inclusion lab)
- Maternity support
- CSR initiatives
- Sparks.

The Company is committed to provide employees with a safe and secure work environment, which is free of discrimination and harassment, including any form of sexual harassment. The Company's 'Grievance Redressal Protocol' outlines ways of working, responsibilities and processes adopted during handling violations pertaining to following:

- Acts which violate Secure Policy of the Company.
- Acts which violate the COBEC and ABAC Policy of the Company and Acts which come under the purview of the Whistleblower Policy of the Company.

The Company has implemented several avenues to resolve employee problems, including the Secure (Anti-Sexual Harassment Initiative), HEAR (Hearing Employees and Resolving their Concerns) platform, and the Whistleblower Policy.

There are no Secure complaints related to sexual harassment reported from Romania in the last 3 financial years.

There are no whistleblower complaints for Romania in the last 3 financial years.

Social

Our long and rich history of giving back to our communities—under the guidance of our founder, Shiv Nadar— was built on the values of innovation, entrepreneurship, humanity and a people-centric culture.

In Romania, HCLTech donated 150 office chairs to schools and the Firefighters Quadrant in Iasi, enhancing educational and operational facilities. Partnerships include Salvati Copii Iasi for educational programs, Little People for oncology hospital support, FEBA for food collection, and several environmental and educational initiatives with local organizations. These efforts underscore our dedication to integrating sustainable practices across all facets of our operations.

Human Rights

At HCLTech, we are deeply committed to upholding and promoting human rights across all our operations and interactions. Our comprehensive global Human Rights Policy reflects this commitment, covering not only our permanent and contractual employees but also trainees, visitors, vendors, supply chain partners, and clients. This policy is available for review [here](#).

To ensure the effectiveness of our Human Rights Policy, we engaged Bureau Veritas to conduct an independent assessment of our practices. This assessment covered 73% of our offices, and no significant risks or concerns were identified. Furthermore, we are proud to report that 95.39% of our total employees have completed training on human rights.

We have robust internal mechanisms in place to address any grievances related to human rights issues. Affected individuals can raise concerns through various accessible, equitable, and transparent channels. Concerns can be reported in writing or orally to reporting managers or Human Resources (HR). Additionally, employees can submit their grievances through the Global Ethics Helpline or contact the Whistleblower Committee via whistleblower@hcltech.com. Complaints can be submitted confidentially or anonymously. We are committed to maintaining the confidentiality of the reporting individual's identity as much as legally possible, while fulfilling our obligation to investigate reported violations.

Moreover, we have integrated human rights considerations into our due diligence process for onboarding new vendors. Human rights requirements are embedded in all our business agreements and contracts, ensuring that our commitment to human rights is upheld throughout our supply chain and business relationships.

We also conduct an annual vendor risk assessment across various categories of purchases. Based on the risk identified and then applying a threshold of total business done with supply chain partners, we select a list of vendors to conduct an ESG assessment. We engage a third party to conduct these assessments. Human rights is an integral aspect of these assessments.

Anti-Corruption and Bribery

HCLTech maintains a robust Code of Business Ethics and Conduct (COBEC) in conjunction with an Anti-Bribery & Anti-Corruption policy (ABAC). These policies are designed to govern the behavior of all individuals within HCLTech's global workforce, including affiliates and subsidiaries, across various levels and grades. By extending their applicability company-wide, HCLTech ensures a consistent commitment to ethical conduct and integrity across its operations worldwide. Periodic evaluations of these policies and practices are undertaken by the Board via its Audit Committee.

The guidelines encompass various aspects including the giving and offering of bribes, bribing of government officials, facilitation payments, charitable donations, and political activities. The Foreign Corrupt Practices Act (FCPA) and UK Bribery Act (UKBA) serve as the governing legislations for these policies.

HCLTech has attained ISO 37001:2016 certification for its Anti-Bribery Management Systems (ABMS), dedicated to combating corruption and bribery. The company conducts ABMS Quarterly Compliance Certification (QCC) to disclose tasks undertaken in the previous quarter. The company undergoes yearly internal and external audits conducted by external organizations to assess compliance with anti-bribery and anti-corruption measures.

Conclusion

In conclusion, our sustainability report highlights our commitment to fostering environmental stewardship, social responsibility, and economic viability. Over the past year, we have made significant strides in reducing our carbon footprint, enhancing resource efficiency, and supporting the well-being of our communities. These efforts underscore our dedication to integrating sustainable practices across all facets of our operations. As we look ahead, we remain steadfast in our mission to drive continuous improvement, innovate sustainably, and collaborate with stakeholders to create a resilient and thriving future for all. Together, we can achieve lasting positive impact and contribute to a sustainable world.