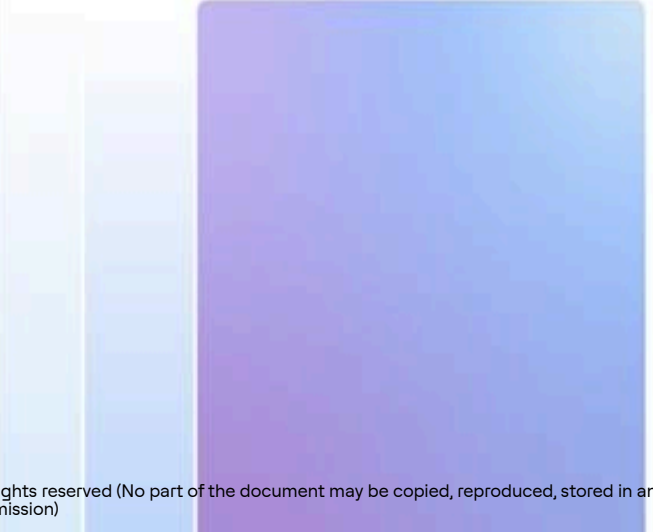
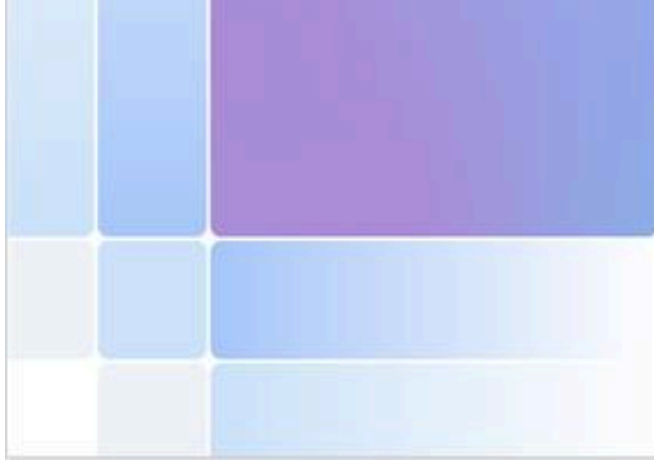


Human Rights Policy

Latest Updated Date: 18 Jul, 2025





Scope

This Policy extends to all employees of HCL Technologies Limited and its global subsidiaries, encompassing full-time, part-time, fixed term, and expatriate personnel. Additionally, the benefits of this Policy will extend to all individuals associated with HCLTech worldwide, including associates, stakeholders, temporary staff, contractors, clients, consultants, trainees, apprentices, interns, and visitors. The Company aims to prevent and address human rights violations by conducting due diligence and taking corrective action as needed. Any employee concerns will be investigated and addressed appropriately.

Scope

The Human Rights Policy applies to all Employees, including full-time, part-time, fixed-term, expat, temporary, and on-contract staff (direct & indirect employees), ; clients, consultants, apprentices/trainees, associates, and visitors.

Scope

This policy applies to all directors, leaders, executives, officers, and employees, full-time, part-time, casual, at every level of HCL Australia (all staff), while engaged with HCL Australia.

This Policy applies in addition to HCL Australia's existing global Code of Business Ethics and Conduct which enshrines HCL Australia's principle of Trust through Transparency and guides all staff on the values, ethics and business principles expected of them in their personal and professional conduct.

Policy Statement

HCLTech is guided by a philosophy that promotes human rights, respects individuals, ensures equality, and prohibits activities that violate human rights.

At the workplace, the Company values diversity. It maintains a long-standing commitment to providing equal opportunities while condemning all forms of discrimination and harassment, irrespective of race, color, religion, or marital status. HCLTech and its employees/individuals must continue respecting, supporting, and promoting human rights.

HCLTech affirms:

- **Respectful Conduct:** We operate with respect for the rights and dignity of all individuals, and we adhere to all legal requirements.
- **International Human Rights Standards:** 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 namely: Freedom of Association and Protection of the Right to Organize, [Right to Organise and Collective Bargaining](#), Forced Labour, Abolition of Forced Labour, Minimum Age, Worst Forms of Child Labour, [Discrimination \(Employment and Occupation\)](#).
- **Fair Treatment:** We ensure fairness for employees, agency staff, and suppliers. Our employees, agency staff and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity.
- **Freedom of Association:** We respect 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.
- **Community Rights:** 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. 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:



**Respect for
Human Rights**



**Valuing
Diversity**



**Safe & Healthy
Workplace**



**Workplace
Security**



**Equal Opportunity
Employer**



**Other
Policies**

Respect for Human Rights

The following fundamental human rights are granted to ensure a safe and healthy work environment:

- **Right to Safety:** Ensuring a secure environment for all.
- **Right to Be Heard:** Valuing the voices and opinions of our employees.
- **Right to Be Informed:** Keeping our team well-informed on relevant matters.
- **Right to Be Redressed:** Addressing grievances promptly and effectively.

Valuing Diversity/Anti-Discrimination/Equal Opportunity Employer

- The Company strictly prohibits disrespectful or unfair treatment, retaliation, or harassment in any work-related scenario, irrespective of personal characteristics or status.

- Our aim is to promote equal opportunity and eradicate discrimination in service planning and delivery, ensuring all employees have an equal opportunity to participate in the Company's democratic processes.
- Recruitment, hiring, training, compensation, and advancement at the Company are merit-based, considering qualifications, performance, and experience. HCLTech is dedicated to ethical business conduct and supports environmental sustainability, human rights, and labor laws.
- We guarantee equal opportunities in all aspects of employment, including promotion, transfer, layoff, wages, and training selection, treating all candidates and employees equally regardless of race, religion, sex, age, national origin, marital status, sexual orientation, medical condition, disability, or any other factor.

Workplace Safety and Health

- The Company is dedicated to maintaining a safe and healthy workplace by adhering to health and safety regulations, thereby minimizing the risk of accidents, injuries, and health hazards to sustain productivity.
- We actively involve employees in enhancing health and safety standards at work, which includes identifying hazards and addressing health and safety concerns collaboratively.

Workplace Security

- The Company is dedicated to upholding a workplace free from violence, harassment, intimidation, and other disruptive conditions.
- We provide necessary security measures while ensuring employee privacy and dignity are upheld.

Other Policies:

Child Labor/Minimum Age/Bonded/Forced Labor/Abolition of Forced Labor/Worst Forms of Child Labor

- HCLTech rigorously prohibits child labor, bonded labor, forced labor, human slavery, or human trafficking, aligning with local laws.
- Furthermore, individuals under 18 years of age are not hired for positions involving hazardous work.

Freedom of Association and Protection of the Right to organize/Right to organize and Collective Bargaining

- We respect our employees' right to join, form or not to join a labor union without fear of reprisal, intimidation, or harassment.

Prevention & Redressal of Sexual Harassment

- All employees and individuals are expected to conduct themselves in a manner that fosters a respectful work environment and upholds the dignity of everyone.

- Harassment, encompassing unwelcome behavior such as visual displays, verbal or physical actions, threats, or demands affecting employment terms or work conditions, is strictly prohibited.
- Any employee or individual who believes they have experienced harassment at work, including during office parties, social functions, or communication outside office hours, retains the right to lodge a complaint via Global Ethics Helpline.
 - Path: MyHCLTech >>Top Ribbon (Main Menu)>> Ethics Helpline
 - Employees in Germany/Netherlands need to use the Smart Service Desk for SECURE complaints or write to secure@hcltech.com
- We are committed to maintaining a safe and healthy work environment by preventing and prohibiting all forms of harassment, including sexual harassment.
- For comprehensive guidance on scenarios, responsibilities, and the complaint procedure, please consult the Prevention & Redressal of Sexual Harassment at Workplace Policy. Employees can also raise concerns by submitting Smart Service Desk requests or contacting hear@hcltech.com.

Anti- Bribery & Anti-Corruption

- All individuals working for or under HCLTech's control are responsible for preventing, detecting, and reporting bribery and corruption.
- Employees must refrain from engaging in activities that could breach this Policy, as they may result in human rights violations.
- Bribery can manifest in various forms beyond monetary transactions, including gifts, insider information, favors, corporate hospitality, nepotism, payment of travel expenses, charitable donations, and abuse of authority, and it can be facilitated directly or through intermediaries.
- Corruption entails misusing authority or power through illegitimate or unethical means, often associated with bribery and favoritism.

Policy Statement

At HCLTech, we are steadfast in our commitment to upholding the principles of dignity and respect for all. We value diversity and are dedicated to fostering a workplace free from discrimination and harassment.

We proactively identify, prevent, and mitigate any human rights violations that may arise from our business operations, employing comprehensive due diligence and effective mitigation strategies. Furthermore, we are committed to promptly investigating and addressing concerns raised by our employees, ensuring appropriate corrective actions are taken in response to any violations uncovered.

Guiding Principles

- **Respectful Conduct:** We operate with respect for the rights and dignity of all individuals, and we adhere to all legal requirements.
- **International Human Rights Standards:** We uphold globally recognized human rights, as outlined in the *International Bill of Human Rights* and the *International Labor Organization's* declaration on Fundamental Principles and Rights at Work.
- **Fair Treatment:** We ensure fairness for employees, agency staff, and suppliers. Our employees, agency staff and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity.
- **Freedom of Association:** We respect 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.
- **Community Rights:** We aim to identify and address the adverse impacts of our activities on human rights and ensure timely remediation.

Policy Framework for an Inclusive and Respectful Workplace

➔ 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**



**Safe & Healthy
Workplace**



**Workplace
Security**



**Equal Opportunity
Employer**



**Other
Policies**

1. Respect Human Rights

- **Right to Safety:** Ensuring a secure environment for all.
- **Right to Be Heard:** Valuing the voices and opinions of our employees.
- **Right to Be Informed:** Keeping our team well-informed on relevant matters.
- **Right to Be Redressed:** Addressing grievances promptly and effectively.

2. Valuing Diversity

- We prohibit disrespectful behavior, unfair treatment, or retaliation based on personal characteristics.
- Harassment in any work-related situation is unacceptable.
- We champion equal opportunities and eliminate discrimination in company procedures.
- Recruitment, hiring, and advancement are based on qualifications and performance.

3. Creating a Safe and Healthy Workplace

- We adhere to health and safety regulations and internal standards.
- Aiming to minimize the risk of accidents, injuries, and health hazards.
- Engaging employees in improving health and safety by identifying hazards and addressing issues.

4. Ensuring Workplace Security

- We maintain a workplace free from violence, harassment, intimidation, and other unsafe or disruptive conditions.
- We provide necessary security measures while respecting the privacy and dignity of employees.

5. Being an Equal Opportunity Employer

- We treat all candidates and employees equally regardless of race, religion, sex, color, age, national origin, marital status, sexual orientation, medical condition, or disability.
- We are committed to provide equal opportunities at all stages of employee life cycle (talent attraction, recruitment, onboarding, engagement & development, compensation, retention, separation and so on.)

6. Respecting Other Relevant Policies

- **Child Labor/Bonded/Forced Labor:** We prohibit child labor, bonded or forced labor, human slavery, or human trafficking in accordance with legal standards.
- **Prevention & Redressal of Sexual Harassment:** We foster a work environment that promotes respect and upholds dignity of all. Harassment of any form is strictly prohibited. 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.
- **Anti-bribery and Anti-corruption:** We ensure the prevention, detection, and reporting of bribery and corruption. Employees must 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. Kindly refer Glossary section for what constitutes bribes and corruption.

Policy Statement

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 an individual is 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 America Inc. and all other HCLTech Entities, branches and subsidiaries across USA, 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 (herein referred as “individuals”).

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 based on race, color, age, religion, creed, marital status, registered domestic partner status, national origin or ancestry, sex (including pregnancy, childbirth or related medical

conditions, and breastfeeding), physical or mental disability, medical condition, sexual orientation, genetic information, gender, gender identity, gender expression, military and veteran status, citizenship status, or any other condition or status protected by law.

- HCLTech and all 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 freedom of association. Where its employees wish to be represented by trade unions or works councils, HCLTech will cooperate in good faith with the bodies that its employees collectively choose to represent them within the appropriate national 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 in compliance with applicable law.

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 be heard
- Right to safety
- Right to be informed
- Right to be redressed



**Right to be
heard**



**Right to
safety**



**Right to be
informed**



**Right to be
redressed**

Prohibition of Harassment

HCLTech endeavours to promote equality of opportunity and eliminate discrimination in the planning and delivery of services. HCLTech expresses its commitment to do business with ethical values and embrace practices that support environment, human rights, and labour laws on a worldwide basis. Regardless of personal characteristics or status, the Company does not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind based on a protected status, condition or activity, or harassment (even if not unlawful) in the workplace and in any work-related circumstance outside the workplace. Accordingly, HCLTech works to stop any perceived mistreatments as soon as it is notified of such activity.

Employees shall not retaliate against any other employee related to an employee's assertion or complaint of discrimination or failure to accommodate. HCLTech shall promptly and fully investigate any complaints of retaliation related to this policy.

Safe and Healthy Workplace

The Company provides a safe and healthy workplace and complies with applicable health & safety regulations and internal requirements as required by applicable law. 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.

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. Under Company policy, everyone is accountable for reporting concerns or perceived violations of this policy, and ensuring that a workplace free of unlawful harassment, discrimination and retaliation is maintained. The Company cannot resolve matters not brought to its attention. Accordingly, if you believe you have experienced or witnessed discrimination, harassment, bullying, retaliation or any other activity in violation of this policy, do not assume that Company management and leadership is aware of the situation, you are directed to immediately report such incidents and/or information to the Company.

Equal Opportunity Employer

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. Also, HCLTech does not permit child labour, bonded labour, Human slavery or Human Trafficking. The standards are guided as set by the International Labour Organization (ILO). Any act notified defying the above stated norms shall be liable for disciplinary actions, up to and including termination, and in compliance with applicable local, state and federal law.

- Additional Important Commitments

- Prevention & Redressal of Sexual Harassment – Employees 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.
- If any employee/ individual believes that he/ she has been harassed in any manner at the workplace or at work, he/she has the right to submit a complaint as per our applicable policy at Secure@HCLTech.com
- Anti- Bribery & Anti-Corruption- HCLTech’s takes matters of Bribery and Corruption very seriously. Please see HCLTech’s policies related to these topics for more information about HCLTech’s stance against these serious issues.

How to raise a concern?

Employees/ individuals are encouraged to raise concerns about any issue regarding or suspicion of a violation of this policy, should report it at the earliest possible stage. In case of any ambiguity if an action constitutes bribery or corruption or any other related query, such concerns must be raised with Reporting Manger and/or the Whistle-blower Committee via whistleblower.hcl@tari.co.in. However, it is always advisable for Employee/ individuals to submit a written complaint narrating the sequence of the events leading to the alleged violation along with any supporting evidence. The Company is committed to keeping 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.

- Complaints Besides the above, the Employee may choose to report to any complaint to risk@HCLTech.com

For details of other policies that cover various aspects of this Policy, please refer to

myhclTech.com > Policies Hub > Policy for Prevention and Redressal of Sexual Harassment at workplace Secure)/ Whistle-blower Policy/ Code of Business Ethics and Conduct/ Anti-Bribery and Anti-Corruption Policy/Disciplinary Policy/Equal Opportunity Employment Policy.

Policy Statement

Our Values

HCL Australia Services Pty Ltd (HCL Australia) acknowledges that it has obligations to protect human rights, starting from the way it conducts its business now and into the future. HCL Australia is committed to ensuring there is transparency in its operations and approach to tackling modern slavery.

Purpose of this Policy

This Modern Slavery Policy (this Policy) is intended to outline HCL Australia’s commitment to identify, assess, address and report on the risks of slavery or human trafficking within HCL Australia’s operations and supply chains.

This Policy applies in addition to HCL Australia's existing global Code of Business Ethics and Conduct which enshrines HCL Australia's principle of Trust through Transparency and guides all staff on the values, ethics and business principles expected of them in their personal and professional conduct. This Policy may be altered by HCL Australia's Board at any time. All staff are expected to familiarise themselves with this Policy as amended from time to time.

Policy Details

As well as this Policy, all staff adhere to a number of workplace policies to ensure performance in accordance with the principles of best practice and continuous improvement, which include but are not limited to:

Code of Business Ethics and Conduct

Whistleblower Policy

Prevention and Redressal of Sexual Harassment at Workplace Policy

Human Rights Policy APMEA

Anti Bribery and Anti Corruption Policy-Global

Alcohol free workplace policy and program – Australia

Drug Free workplace policy and program – Australia

Anti-Money Laundering Policy-Global

Equal Employment Opportunity Policy

No Smoking policy- global

Occupational Health Safety and Environmental Policy

Procurement Policy

Compliance with Laws and Standards

HCL Australia will comply with all local laws and regulations in relation to the employment of personnel. HCL Australia expects all staff to comply with our human rights and modern slavery commitments. These include but are not limited to:

(a) Fair Work Act 2009 (Cth);

(b) Modern Slavery Act 2018 (Cth);

(c) Australian Criminal Code Act 1995 (Cth), specifically, Division 270 or 271 of the Criminal Code, extending to conduct in and outside of Australia;

HCL Australia will also comply with the following laws and guidelines:

(d) Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework;

(e) Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children; and

(f) ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.

Modern slavery and Human Rights

Modern slavery is only used to describe serious exploitation. Modern slavery has a broad scope and includes trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.

Modern slavery includes conduct which would constitute:

(a) an offence under Division 270 or 271 of the Criminal Code; or

(b) an offence under either of those Divisions if the conduct took place in Australia; or

(c) trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or

(d) the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

HCL Australia has a zero-tolerance approach to modern slavery within its operations and supply chains.

HCL Australia understands that modern slavery is unlikely to prosper where other human rights are respected. The Modern Slavery Act 2018 (Cth) (MSA) draws on principles adopted in the 2011 Guiding Principles on Business and Human Rights (UNGPs). The UNGPs set a global standard of conduct expected for all business enterprises.

Operations and Supply Chains

Operations

HCL Australia recognises that every entity has modern slavery risks in its operations. The primary work of HCL Australia involves the provision of information and technology goods and services which is recognised as a high-risk industry globally for modern slavery.

Supply Chains

HCL Australia seeks to do business with suppliers that have similar values, ethical and sustainable business practises including in relation to human rights. HCL Australia understands that the risks relating to suppliers will vary depending on their industry geographic location and the types of goods and services they

supply to HCL Australia. HCL Australia's supply chains are diverse and global and some of our suppliers are based in high risk geographic locations.

HCL Australia has a Supplier Code of Conduct which meaningfully communicates HCL Australia's zero tolerance approach to modern slavery to all suppliers and the standards that suppliers must adhere to.

Risk Assessment and Due Diligence

HCL Australia has risk management processes to assist in identifying areas of concern so that mitigating action can be taken to lessen those risks. These include:

- a) Inclusion of modern slavery clauses in procurement contracts;
- b) Due diligence processes when taking on new suppliers;
- c) Our Supplier Code of Conduct, which details the expectations on all suppliers in relation to preventing modern slavery;
- d) Our Whistleblower Policy, which enables all staff (in certain circumstances) to report suspicions of misconduct or an improper state of affairs or circumstances about HCL Australia such as modern slavery;
- e) Our Supplier Questionnaire which can be sent to selected high risk Suppliers to assist in identifying the need for any auditing;
- f) Our modern slavery training for all staff regarding the risks HCL Australia faces in relation to modern slavery in its operations and supply chains; and
- g) Our modern slavery workshops with key stakeholders on due diligence processes to ensure compliance with the MSA.

Communication and Awareness of this Policy

The awareness, responsibility and conduct of all staff are instrumental in mitigating the risk of modern slavery within our operations and supply chains.

Training

HCL Australia will provide training to staff on identifying modern slavery risks in its operations and supply chains generally and ensuring compliance with HCL Australia's obligations under the MSA.

HCL Australia commits to ensuring training is held with reasonable frequency in relation to this Policy for all staff.

HCL Australia commits to ensuring further workshopping is held for staff in positions where they are directly involved with procurement processes and manage relationships with suppliers.

Breach of the Policy

Any staff member who breaches this Policy by engaging in or conspiring to engage in any modern slavery conduct may face disciplinary action. HCL Australia may terminate relationships with individuals or organisations working on our behalf if they breach this Policy. Referral action to proper authorities will be taken in cases involving breaches of the criminal law.

Responsibility of staff

All staff have a responsibility to detect and report any concerns they may have in relation to modern slavery within HCL Australia's operations and supply chains.

Such concerns are to be reported to [Human Resources].

HCL Australia has a Whistleblower Policy which enables all staff (in certain circumstances) to report suspicions of misconduct or an improper state of affairs or circumstances about HCL Australia such as modern slavery.

Queries relating to this Policy may be directed to [Human Resources].

Review of this Policy

This Policy was initially adopted on [date] and is subject to a review by [the Board] on an annual basis to ensure that it is operating effectively and consider whether any amendments are required.

Process

How to report a concern

- Employees/individuals are encouraged to promptly raise any concerns or suspicions of malpractice if uncertain whether an action constitutes bribery, corruption, or related issues.
- Such concerns should be reported to the Reporting Manager (RM) or contact the Global Ethics Helpline* and/or the Whistleblower Committee via **whistleblower@hcltech.com**. It is recommended that a written complaint detailing the events leading to the violation and any supporting evidence be submitted.

- The Company is committed to maintaining the confidentiality of the reporting employee/individual's identity to the maximum extent possible, in line with legal obligations. However, confidentiality may be subject to the Company's need to investigate reported violations.

****Employees in Germany/Netherlands must send an email to whistleblower@hcltech.com for grievances***

➔ For details of other policies that cover various aspects of this Policy, please follow these steps:



Log in to [MyHCLTech](#)



Go to the [Policy Studio](#)



Select the [desired policy](#) from the list:

- ➔ [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](#)

Process

HCLTech responsibility if Child Labor reported:

If any instance of child labor reported to us, HCLTech will:

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1. Verify the child's age against official records/documentation.

2. Take immediate action:

Quickly and appropriately remove the child worker from their work area to ensure their safety. Record their names, ages, and contact details. Explain working age restrictions and legal requirements clearly and carry out an age verification check. Consult child-focused organizations/NGOs and inform local authorities as applicable.

3. Terminate the employment.

4. Conduct a thorough investigation to prevent recurrence.

HCLTech handles each case individually, prioritizing the child's best interests in a remediation plan.

Raising concerns

Employees are encouraged to raise concerns by following below mechanisms:

- **Report Child Labor**

We are dedicated to addressing and resolving any cases of child labor. Any instance of child labor can be reported to the Global Ethics Helpline.

Path: MyHCLTech >>Top Ribbon (Main Menu)>> Ethics Helpline

Employees in Germany/Netherlands shall continue using the Smart Service Desk for HEAR complaints or write to hear@hcltech.com.

- **Report Sexual Harassment at the Workplace**

If you experience harassment at work – during work, office events, social functions, or even through phone calls and emails outside of office hours – you have the right to file a complaint.

Please report all forms of harassment, including sexual harassment, to maintain a safe work environment at Global Ethics Helpline. We are with you!

Path: MyHCLTech >>Top Ribbon (Main Menu)>> Ethics Helpline

Please refer to the *Sexual Harassment at Workplace Policy* for details on filing complaints.

Employees in Germany/Netherlands need to use the Smart Service Desk for SECURE complaints or write to secure@hcltech.com.

- **Report Malpractice**

Unsure about whether an action constitutes bribery, corruption, or related issues? Please discuss your concerns with your Reporting Manager or contact the Global Ethics Helpline. **We recommend submitting a written complaint with details and evidence.** The Company prioritizes confidentiality but may need to investigate reported violations.

➔ For details of other policies that cover various aspects of this Policy, please follow these steps:



Log in to **MyHCLTech**



Go to the **Policy Studio**



Select the **desired policy** from the list:

- ➔ 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

Employees in Germany/Netherlands must send an email to whistleblower@hcltech.com for grievances.

Consequences

Any non-adherence to this policy will attract consequences subject to appropriate investigation and corrective actions as per the disciplinary policy and local law.

Consequences

Any non-adherence to this policy will attract consequences subject to appropriate investigation and corrective actions as per the disciplinary policy and local law.

Annexure

Revision History:

Version	From	To	Description	Author	Approved By
1	19 Jul 2021	04 Sep 2021	First Copy	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
2	05 Sep 2021	-	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head

Annexure

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	31 Mar 2024	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head

Annexure

Revision History:

Version	From	To	Description	Author	Approved by
1	01 Aug 2019	-	First Copy	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head

Annexure

Version	From	To	Description	Author	Approved By
1	24 Mar 2023	-	First Copy	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head

Glossary

The following definitions shall apply to these terms unless stated otherwise:

Term	Definition
Policy	HCL Human Rights Policy
HCLTech/Company	HCL Technologies Ltd. and its subsidiaries in India
Employee(s)	Individuals employed by HCLTech, including permanent, fixed-term, part-time, and expatriate employees, as applicable
Bribe	Money, gifts, inside information, favors, hospitality, offering employment to relatives, reimbursing travel expenses, charitable donations, or abusing power through a third party.
Corruption	Illegitimate or unethical actions by authorities or those in power and often involves bribery and patronage.

Glossary

Terms	Referring to
Company	HCL Technologies and its subsidiaries worldwide
Employee	A person on the payrolls of the Company, including but not limited to Permanent/Contract retainers/ Expatriates working on work visas issued by appropriate authority, if any

Glossary

Terms	Definition
Reporting Manager (RM)	shall mean any other Employee of HCLTech or its parent company and its subsidiaries who by nature of his or her duties, exercises authority or supervision or control over an Employee during this normal duty hour;
Company	refers to HCL America Inc. and all other HCLTech Entities, branches and subsidiaries across US (hereafter referred as "HCLTech" or "the Company")
Employee	refers to a person who is on the payrolls of the Company and shall include expatriates working with the Company subject to the secondment /deputation letter issued, if any;
Associates/Stakeholders/Ad-hoc/Daily wagers/Temporary staff	refer to a person who is not directly employed with the Company but is visiting the Company Premises for official reasons/ personal requirement;

Keywords

Human rights violation, Discrimination, Harassment, Opportunities, Respect for Human Rights, Valuing Diversity, Safe and Healthy Workplace, Workplace Security, Equal Opportunity Employer, Whistleblower, Child labor, Sexual harassment, Human Rights Policy-Global, Policy, Corporate Governance

Keywords

Human Rights Policy, Equal Opportunity Employer, Child Labour, Sexual Harassment, Bribery, Policy, Human Rights Policy India, Corporate Governance

Keywords

Modern Slavery Policy, Human trafficking, Human rights

Disclaimers

The Company reserves the right to alter, append or withdraw this Policy either in part or in full based on management's discretion along with Unions or Work Council approval/discussions (as applicable) . All procedures as per the law of land to be adhered to prior to Policy launch.

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Disclaimers

This Policy may be altered by HCL Australia's Board at any time. All staff are expected to familiarise themselves with this Policy as amended from time to time.

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Policy History

Modified Date	Version No.	From	To	Reason for creation / updation	Author	Approved by
15 Nov, 2024	1	1 Apr, 2024		Launch in new Policies Hub	Disha Sharma(Geo HR Serv - Trans - Trans - Offshore)	Srinivasan Govindan(Ent HR-I&C-I&C-Policy-Policy)
15 Nov, 2024	1	1 Apr, 2024		Launch in new Policies Hub	Disha Sharma(Geo HR Serv - Trans - Trans - Offshore)	Srinivasan Govindan(Ent HR-I&C-I&C-Policy-Policy)
21 Nov, 2024	1	1 Apr, 2024	19 Nov, 2024	Launch in new Policies Hub	Disha Sharma(Ent HR-I&C-I&C-Policy-Policy)	Srinivasan Govindan(Ent HR-I&C-I&C-Policy-Policy)
21 Nov, 2024	2	20 Nov, 2024		Policy has been revised	Disha Sharma(Geo HR Serv - Trans - Trans - Offshore)	Srinivasan Govindan(Ent HR-I&C-I&C-Policy-Policy)
21 Jan, 2025	1	16 Dec, 2024		Launch on new policy studio	Disha Sharma(Geo HR Serv - Trans - Trans - Offshore)	Srinivasan Govindan(Ent HR-I&C-I&C-Policy-Policy)
21 Jul, 2025	1	18 Jul, 2025		Launch in Policy Studio	Disha Sharma(Geo HR Serv - Trans - Trans - Offshore)	Srinivasan Govindan(Ent HR-I&C-I&C-Policy-Policy)