

**Code of Business Ethics and
Conduct-Global**

Latest Updated Date: 17 Feb, 2025

Scope

Values

Core values

Our core values serve as our guide and steadfast pillars, steering us towards our vision and aspirations. These values describe our fundamental beliefs and principles and help shape our individual as well as collective behavior and actions.

Our values

Integrity

We maintain the highest ethical standards and are committed to doing the right thing, all the time.

Inclusion

We create an environment where everyone can succeed and be encouraged to be their best and most authentic selves. We believe in providing equal access and opportunities to all.

Value Creation

We're obsessed with creating value for our clients and supercharging their progress. We always go the extra mile, day in and day out, to deliver on our commitments and identify new opportunities for growth.

People-Centricity

We encourage our people to "find their spark" and shape their career journeys. We empower people to be entrepreneurs and creators, encouraging them to surface ideas, big and small.

Social Responsibility

We give back to our communities, and we are focused on doing the right things for our planet and the communities where we work and live.

How it all comes together

Supercharging Progress™ is our pledge to deliver business outcomes quickly and efficiently, with a focus on pragmatism and resilience. This promise extends beyond our clients to encompass our people, the communities we serve, our shareholders and the planet as a whole.

Our Mission

To make a positive global impact by harnessing the power of technology for our clients and our people. We strive to uplift our diverse workforce to deliver innovative business solutions while maintaining the highest standards of integrity, sustainability and social responsibility.

Purpose

We bring together the best of technology and our people to supercharge progress, for our clients, people, communities and planet.

Values

Integrity, Inclusion, Value Creation, People Centricity and Social Responsibility

Employee Value Proposition

To help our people find their spark that intrigues, motivates, and inspires them so they maximize their potential and help supercharge progress.

Supercharging Progress

- Who we are
- What we want to achieve
- What customers, employees can see through our culture
- What an organization really cares about

Policy Statement

Dear HCLTechies,

HCLTech has always lived by a strong value system focused on doing business the right way and treating our colleagues with mutual respect. We've been recognized globally by Ethisphere in 2024 as one of the World's Most Ethical Companies®.

Each one of us must understand and embody HCLTech's core values of Integrity, Inclusion, Value Creation, People Centricity and Social Responsibility. Remember, all of us are brand ambassadors for the organization and are expected to demonstrate these values to our stakeholders.

The HCLTech Code of Business Ethics and Conduct outlines these values in detail, along with policies and consequences that govern our behaviors. I encourage you to refer to this document and let it be your North Star as you find your spark and advance your careers with HCLTech.

Importantly, speak up if you come across any violation of HCLTech's values and code of ethics. We rely on each other to be responsible and hold ourselves accountable. You can report any such matters or violations on the Global Ethics Helpline portal.

I look forward to your commitment as we move forward on our growth journey with the purpose of bringing together the best of technology and our people to supercharge progress.

“Remember, it's important to achieve goals, and it's even more important to do it the right way.”

[Signature]

Regards,

C Vijayakumar

CEO & Managing Director

Process

Our Code, our responsibilities

Our Code of Business Ethics and Conduct

Purpose of the Code

Our Code is a guide to help each of us do what's right. It highlights the principles we must follow as we go about our daily work. Our Code helps us build a culture of ethics and compliance, manage risk and supercharge progress.

How to use the Code

Read our Code to understand the expected behaviors when dealing with our people, our clients, our company and our communities. Refer to the Code when you are unsure about a policy or an ethical issue. Use the contacts and resources outlined in the Code to learn more or seek support. Our Code is where we look first to align our actions with our values.

Our responsibilities

Applicability

Our Code applies to all HCLTechies, HCLTech officers, board members, consultants and contractors, including persons associated with HCLTech, wherever we do business.

Waivers and amendments

Our Code is a living document. From time to time, we may make changes to adapt to evolving business needs and legal updates. All such changes must be approved by a majority of Top Management. In rare cases, HCLTech may waive certain provisions of our Code, policies or procedures. All such waivers must be approved, in writing, by a majority of Top Management.

Everyone's responsibilities

We are all responsible for knowing our Code and acting in accordance with our policies, procedures and the law. We comply with all legal and regulatory requirements, wherever we do business.

We use our best judgment and apply the strictest ethical standard in our choices. When our Code expects a higher standard of conduct than the law, we follow our Code. When local custom or policy conflicts with our Code, anywhere we do business, we follow our Code.

Remote work

In recent years, more of us are working remotely. Even those of us who don't report to an office on a regular basis must follow our Code. Our Code applies to all our HCLTechies, regardless of where they work.

Special responsibilities of People Managers

In addition to the above, People Managers must:

- Make sure all members of their teams are working in accordance with our Code, our policies and the law
- Keep HCLTechies up to date on trainings related to our Code, our policies and ethics and compliance issues
- Be available as a first contact whenever ethics and compliance questions or concerns arise
- Set an example of how best to live our HCLTech values

Special responsibilities of board members

Our board members play an important role in steering HCLTech at a high level. All board members must:

- Remain up to date on HCLTech and the factors that affect our business
- Attend all board meetings and participate in all committees they are a part of
- Monitor our policies and reporting mechanisms to make sure they are current, effective and in alignment with our values and the law
- Protect the legitimate interests of HCLTech
- Don't take part in illegal or unethical trade or investment practices

How we choose the right course of action

At times, choosing the right course of action may be difficult. If you are unsure of what to do, ask yourself these questions:

- Would this action violate any laws or regulations?
- Would this action violate any HCLTech policies or our Code?
- Would this action conflict with HCLTech's core values?
- Would this action harm HCLTech in any way?

If the answer to any of these questions is yes, do not proceed. Talk to your People Manager,

your team members or any other resource listed in this Code to find a better way forward.

We speak up

Seeking help, speaking up

We may at times become aware of unethical or illegal conduct, or violations of our Code. We are all responsible for speaking up when this happens. We protect HCLTech's reputation and our ability to innovate in a positive workplace when we hold ourselves accountable.

If you ever suspect anyone of a violation, or need help with an ethical matter, use one or more of these options:

- Report the issue to the Global Ethics Helpline
 - MyHCLTech > Top Ribbon (Main Menu) > Ethics Helpline
- In Germany and the Netherlands, write to whistleblower@hcltech.com

Discuss the issue with your People Manager

Anonymity and confidentiality

If you wish to remain anonymous when making a complaint, we will take all reasonable steps to protect your identity. Be aware that remaining anonymous may affect our ability to investigate. We may need to reveal the

identity of the person reporting a suspected violation if identification is:

- Necessary to effectively respond to the report
- Required by law
- Required as part of a disciplinary proceeding

We keep all details of investigations confidential, to the extent allowable by law. Only the Ethics Committee (EC), the Internal Investigation team and those directly involved in the issue will learn details of the investigation, and only on an as-needed basis.

What happens when we report an issue?

We take all reports very seriously. Any time a report is submitted, we follow these steps:

Step 1: The Ombudsperson will carry out a preliminary investigation of a Complaint to decide if a full investigation is required based on facts alleged in the Complaint. If a full investigation is not required, the Ombudsperson shall submit its report to the EC. If the Ombudsperson decides that a full investigation is required, such Complaints shall be forwarded to the Internal Investigation team.

Step 2: The Internal Investigation team shall decide upon further investigation and next steps in consultation with the EC.

Step 3: The Internal Investigation team shall submit its interim report to the Chief People Officer “CPO” and its final report to the EC, and any disciplinary action shall be decided by the Chief People Officer “CPO” in consultation with the EC, as needed. We do not retaliate

We do not retaliate

We are resilient in the face of challenges, and we encourage a culture where all HCLTechies feel free to speak out. That’s why we do not tolerate retaliation of any kind against someone who makes a report in good faith. Any threats against such a person, including threats of physical harm, job loss or salary reduction, are strictly prohibited. Anyone who feels intimidated for having made a report may contact the EC.

Consequences of non-compliance

To uphold our reputation for integrity and protect HCLTech, we must act in accordance with our values, our Code and the law. Those who violate our Code, our policies, or any laws or regulations will be held accountable. Consequences may include but are not limited to the following:

- Verbal warning
- Written warning
- Probation
- Termination of employment
- Legal action

We do what’s right for our people

We embrace Diversity, Equity and Inclusion

Doing what’s right

We support all our HCLTechies in being the most authentic versions of themselves. By removing barriers in our Diverse, Equitable and Inclusive culture, we make HCLTech stronger.

Why we do what's right

Diversity brings fresh perspectives and improves our insights and decision-making. By including diverse voices and cultures, we strengthen our business. We become more resilient and more innovative, and we attract a wide variety of talents. The barriers and biases we remove in pursuit of Diversity, Equity and Inclusion make way for a future of supercharged progress.

How we do what's right

We embrace Diversity, Equity and Inclusion when we:

- Include and seek inputs from all HCLTechies
- Build our workforce with diversity in mind
- Actively seek out and listen to the points of view of others
- Support and nurture our differences, and remove barriers to inclusion
- Confront bias in ourselves and others with empathy and respect
- Speak out to protect our point of view and the views of others

Our commitment to five pillars of Diversity, Equity and Inclusion

We believe “Inclusion is achieved when people believe that their unique and authentic self is valued, they are treated equally and with respect, they feel safe while expressing their opinion and when they are empowered to take decisions to grow and do their best.” Our areas of focus are on five pillars:

- Gender inclusion to empower women
- Disability inclusion to accommodate HCLTechies with disabilities
- Cultural inclusion to make sure all cultural backgrounds, ways of working and lifestyles are respected
- LGBTQIA+ inclusion to foster a safe and supportive space for all LGBTQIA+ people and their allies
- Veteran inclusion to include HCLTechies who have served in the Armed Forces, are serving or plan to serve.

Doing what's right – in action

Q: I recently had an accident that has severely impacted my life. Doctors say I won't walk again and will need to use a wheelchair. Am I going to be able to feel comfortable going to work again?

A: Going through a challenge like yours cannot be easy, but know that HCLTech will make every accommodation to make sure you can continue to thrive at work. We design our workspaces with accessibility in mind, and we will make whatever other adjustments we can to keep you independent. We want all our HCLTechies to feel included, just the way they are.

[Learn More](#)

[Corporate Social Responsibility Policy](#)

We treat each other with respect

Doing what's right

We create and maintain a respectful work environment, free from harassment of any kind. We all have a right to feel respected and supported at work.

Why we do what's right

Our top priority is to do our best work — to innovate within the value zone between our HCLTechies and our clients. To make this happen, we must treat each other with respect, always. A respectful work environment reduces distractions and encourages contributions. We do not tolerate offensive behavior, bullying or harassment in any form because such behavior threatens our purpose, our unity and our focus.

How we do what's right

We treat each other with respect when we:

- Approach all interactions with professionalism and tact
- Value the dignity of all our co-workers and their Contributions
- Don't say or do anything others may find offensive
- Don't take part in any behavior that could create a hostile environment, including harassment and intimidation
- Report any offensive, harassing or intimidating behavior to a People Manager or the Global Ethics Helpline

Understanding harassment

One way to make sure we avoid harassment, and speak up when we see it, is to make sure we understand it. Harassment can be about:

- What we say or write, including slurs, stereotypes and offensive or abusive language
- What we do, such as unwelcome touching, making sexual advances or blocking a co-worker's path
- What we display, including sexually explicit images left on a screen or hung up in a workspace as well as printed slogans or posters that others may find offensive

Remember that harassment isn't about what we intend by our words or actions but how others might perceive them.

Doing what's right – in action

Q: I always dress professionally, and I take pride in how I look. Recently, a co-worker started giving me compliments, which I usually don't mind. But this co-worker started saying things about my body that made me uncomfortable, and he has started hovering around my workspace when I am trying to concentrate. What should I do?

A: Your co-worker's behavior is unacceptable. You should first let him know that his words and actions are making you uncomfortable. If you are not comfortable talking to him, or if talking to him doesn't help, discuss the issue with your People Manager. You may also report your co-worker's behavior to the Global Ethics Helpline. You should never feel uncomfortable or disrespected as part of HCLTech.

We promote equal opportunity

Doing what's right

We make all hiring and promotion decisions based on merit, and we don't discriminate against any person or group.

Why we do what's right

Just as our commitment to diversity brings us unique insights, our commitment to equal opportunity brings us the most qualified HCLTechies. Equal opportunity opens our hiring and promotion process to all, regardless of identity, so that we may make the best possible use of the talents and abilities that sustain our success. As a company committed to fairness, we insist on fairness in all our employment decisions.

How we do what's right

We promote equal opportunity when we:

- Treat each other fairly, with a focus on the qualifications, experience and value we bring to HCLTech
- Make all hiring, training and promotion decisions based on merit
- Make all accommodations for HCLTechies with disabilities
- Don't discriminate against any person or group on the basis of a protected characteristic
- Report any instances of discrimination to a People Manager or the Global Ethics Helpline

HCLTech encourages HCLTechies to report any concerns through:

- Global Ethics Helpline on www.hcltech.com.
- Employees based out of Germany or the Netherlands shall continue to raise their grievances by writing to whistleblower@hcltech.com.
- External stakeholders to report any concerns through https://app.convercent.com/en-US/LandingPage/dceb2afa-6c00-ec11-a983-000d3ab9f062?_=163051502690

Understanding discrimination

Though we make evaluations based on qualifications, we don't discriminate on the basis of a protected characteristic. Protected characteristics include but are not limited to:

- Race or ethnicity
- Age
- Religion
- Sex, gender, sexual orientation or gender identity
- Disability

We embrace all of our differences and focus on the skills and abilities we bring to HCLTech.

Doing what's right – in action

Q: I've been working on cloud architecture for one of our clients for several months, and my skill level in this area has improved dramatically. Even my coworkers say that they are impressed with how I have grown. Yet when I had a performance review with my People Manager, he said that I was not eligible for a raise or promotion. Is it possible that I'm being discriminated against because I'm a woman?

A: It's possible, but we would need more information to know for sure. Your People Manager may have responded the way he did for a variety of reasons. Have men on your team been promoted for comparable work? Do you have other reasons to believe you are being treated unfairly? If so, raise these concerns with

your People Manager, or make a report to the Global Ethics Helpline or whistleblower@hcltech.com (for employees in Germany and the Netherlands).

We keep our workplaces safe and healthy

Doing what's right

Safety is a top priority, and we complete all work tasks in the safest, healthiest ways possible. We don't compromise when it comes to our health and safety.

Why we do what's right

Our physical and mental health are essential to achieving our purpose as a business. We cannot stay resilient in the face of challenges if our workplaces are unsafe in any way. We are all responsible for looking out for each other, following our safety procedures and protocols, and staying aware of our work environments. This enables us to do what we do best: break boundaries and advance technology.

How we do what's right

We keep our workplaces safe and healthy when we:

- Don't work recklessly, take unnecessary risks or direct others to do so
- Are aware of our Occupational Health & Safety Policy and Environmental Policy
- Know all emergency safety procedures and attend all safety trainings
- Watch out for each other to make sure we are staying safe on the job
- Don't work under the influence of illegal drugs or alcohol, and don't bring controlled substances to work
- Talk to the reporting People Manager or HR to get any needed support for mental or emotional health
- Don't bring weapons of any kind to work, and report any weapons you may see to the reporting People Manager or HR Partner
- Report any unsafe working conditions or processes on the tool 'Incidents Occupational Health & Safety and environment' available on www.myhcltech.com
- Resolve disagreements calmly, and report any acts or threats of violence to the reporting People Manager or HR Partner
- Follow all best practices, policies and procedures for regular work tasks

Doing what's right – in action

Q: I spend a lot of time in front of my computer, and though I am careful from an ergonomic standpoint, I sometimes experience serious eye strain. Some days, I feel as if my vision is getting worse. Is this a safety issue?

A: Yes. Discuss your problem with your People Manager or HR immediately. We can make sure that your workspace has optimal lighting and that your computer screen has the best contrast for reducing eye strain. You can also take short breaks to rest your eyes as needed.

We keep our people secure

Doing what's right

We are prepared for what the future might bring, and we take all steps to keep our people and our workplaces secure, every day.

Why we do what's right

We are optimistic about the future, and we are also pragmatists. As pragmatic optimists, we accept the possibility that crises may arise and accept full responsibility for being prepared. We show our preparedness in the daily habits that reduce risk and maximize security, and also in the plans we have in place to respond to challenges that may arise. Our long-term success depends on both.

How we do what's right

We keep our people secure when we:

- Know our roles in emergency situations
- Attend all trainings and drills related to security and crisis management
- Remain aware of our surroundings and of potential security risks
- Share concerns and best practices related to security and crisis management
- Communicate transparently and respectfully with anyone affected by any crises or security breaches we may experience
- Promptly report to a People Manager any compromises to workplace security we may become aware of
- Keep all workplaces locked and secure according to our policies and procedures

Leadership in an emergency

When a crisis arises, designated leaders have special responsibilities. Though we hope no one will ever need to take on such responsibilities, preparedness could be essential to survival. If you have a designated leadership role in an emergency situation, make yourself visible and available. Others will be looking to you.

Doing what's right – in action

Q: I have a license to carry a firearm where I live. Shouldn't I be able to bring a weapon to work?

A: No. As a matter of policy, we do not allow HCLTechies to bring weapons of any kind to work

because some HCLTechies may feel threatened by this. We want all HCLTechies to feel safe, secure and ready to apply their skills and imaginations to important work problems.

We comply with employment and labor laws

Doing what's right

As a global company with a large workforce, we are committed to treating all our HCLTechies fairly. We comply with all employment and labor laws and regulations, anywhere we do business.

Why we do what's right

Treating all our HCLTechies fairly and according to the law builds our strength as a business. Though we are many, we come together as one because we value the contributions and dignity of all. Complying with all employment and labor laws is the right and responsible thing to do — it is also the smartest approach for the health of our business and our organization.

How we do what's right

We comply with employment and labor laws when we:

- Treat all HCLTechies fairly, whatever their role and wherever they may work
- Honor all contracts and employment agreements
- Negotiate lawfully and in good faith with labor unions and other labor representatives
- Attend all trainings on employment and labor law and related HCLTech policies and procedures
- Report any violations of labor or employment law to your People Manager or the Global Ethics Helpline
- Follow all laws and HCLTech policies and procedures related to labor and employment

Doing what's right – in action

Q: I need to expand my team temporarily because our cloud services client has asked for more than we expected. What's the best way to move forward?

A: After you have approval from top management to start the hiring process, contact HR to make sure you are following the correct procedures. We want you to find the specialized talent that you need in the timeframe that you need it, without cutting any corners legally.

We do what's right for our clients

We prevent bribery and corruption

Doing what's right

We conduct all business with honesty, integrity and the highest ethical standards. We have zero tolerance for bribery, and we never offer or accept any improper incentives, anywhere we do business.

Why we do what's right

Our clients know they can count on us—that we are there when they need us. In part, that's because of the solutions we provide, but it's also because we do not tolerate corruption. Corruption in all its forms damages reputations and does harm to relationships. We maintain our resilience in the face of challenges, and retain our clients' trust, when we conduct business on our merits, and only on our merits.

What is an "improper payment"?

Improper payments can come in many forms. Here are a few examples:

- **Bribe:** A bribe can be anything of value, including cash, gifts, inside information, favors and hospitality. Any of these can be considered a bribe if they are intended to gain an improper business advantage.
- **Kickback:** This is a payment made to someone who has facilitated a business arrangement, such as a contract. The payment is improper because it is only for securing the contract, not for any goods or service.
- **Facilitating payment:** This type of payment is often made to a government official to expedite a standard process, such as checking goods when they are shipped across a border. In that case, a facilitating payment might allow the goods to pass through customs more quickly than others.

How we do what's right

We prevent bribery and corruption when we:

- Keep accurate records of all payments
- Never offer anything of value to gain a business advantage

- Never accept anything of value from a third party we are negotiating with
- Never accept anything of value from a third party we know or suspect is offering it to gain a business advantage
- Never offer anything of value to a government official or agent to expedite a routine process
- Never offer or accept a bribe or kickback
- Never use a third party to make payments we would not make ourselves
- Follow HCLTech policy on giving and receiving payments
- Report any concerns about improper payments to a manager or to the Global Ethics Helpline

Doing what's right – in action

Q: I am working on a project to help customize digital customer service for a large company. The software we are helping to develop operates across international boundaries. Recently, I was contacted by a government official who suggested he could help HCLTech and our business partner bypass the encryption regulations in his country if we were willing to pay him in cash. What should I do?

A: This government official is asking for a bribe. Do not make any payments and report the incident immediately to your manager. You may also report this to the Global Ethics Helpline. We never make improper payments to bypass a regulation, or for any other reason.

[Learn More Anti-Bribery and Anti-Corruption Policy—Global](#)

We conduct business with integrity

Doing what's right

As a global company, we must be aware of laws in many different countries. We comply with these laws and regulations, as well as all international trade regulations that affect our business.

Why we do what's right

We're a pioneering company when it comes to breaking boundaries to advance technology. However, we respect national borders and follow international trade regulations. We pioneer responsibly because our business relies on fair and predictable norms. Violating laws, regulations and treaties that govern international business could harm our reputation and bring serious consequences.

Data privacy

As a technology services company, we must safeguard the data that we gather and apply on a daily basis. Data privacy laws vary significantly around the world — a rule, regulation or standard that applies in Europe may not apply in India or the United States. We remain current on the state of data privacy law, anywhere and everywhere we do business. Our clients, and our reputation, depend on it.

How we do what's right

We conduct business with integrity when we:

- Learn all relevant laws and regulations before marketing or distributing across international borders
- Conduct thorough due diligence when evaluating business partners around the world
- Follow all restrictions regarding data privacy in all countries where we do business
- Don't do business with any entities on a U.S. or EU embargo or sanctions list

- Follow all policies and procedures related to international trade
- Collect, use and process personal information only for legitimate business purposes
- Process personal information in line with the privacy principles defined in HCLTech's Global Privacy Policy and binding corporate rules
- Act in accordance with applicable laws and relevant contractual obligations
- Report any suspected data breach immediately
- Adhere to the highest security standards when we handle personal information
- Report any violations of our international trade policies or the law to your People Manager or to the Global Ethics Helpline

Doing what's right – in action

Q: I am working in a team that is helping digitize an automobile manufacturing process. We found a way to get the sensors we need for a great price, but the company that makes them is located in a country currently on an embargo list. Is there a way we can work with this business?

A: No. Unfortunately, you will have to find another way to acquire these sensors. We don't do business involving countries on any U.S. or EU embargo lists.

[Learn More](#)

[Anti-Money Laundering Policy — Global](#)

[Export Compliance Policy](#)

[Human Rights Policy](#)

We compete honestly and fairly

Doing what's right

We win business by providing imaginative solutions to our clients. We don't seek unfair advantages in the marketplace — we don't want or need to.

Why we do what's right

Since 1976, HCLTech has been competing for business using ingenuity and innovation. We welcome competition because we know it makes us better, and because it is ultimately better for our clients and the marketplace as a whole. We've earned our reputation as a resilient and pioneering tech company. To protect that reputation and avoid serious consequences, we follow all fair-competition laws.

How we do what's right

We compete honestly and fairly when we:

- Avoid discussing pricing, bidding or how we divide markets with our competitors
- Avoid stating anything negative or untrue about our competitors or their products and services
- Use only public sources to gather competitive information
- Follow all policies, procedures and laws related to fair competition
- Report any violation of our fair-competition policies or the law to a People Manager or the Global Ethics Helpline

What are anticompetitive practices?

Anticompetitive practices are methods of limiting competition or seeking an unfair advantage in the marketplace. Examples include:

- **Price fixing:** competitors agree to use the same price so that clients cannot seek out the best value
- **Bid rigging:** competitors agree in advance who will win a competitive bidding process
- **Market division:** competitors divide territories and agree to stay in their own, thus reducing client Choice
- **Group boycott:** two or more competitors refuse to do business with a specific person or company

Doing what's right – in action

Q: At a recent expo for aircraft interiors, I ran into an old college friend. We took a little time to catch up, and I learned that she now works for a competitor of ours. She said she was curious about our pricing and that she would be happy to share pricing information from her company, if I was ever interested. I politely ended the conversation without committing to anything. Was that the right thing to do?

A: Yes. Comparing pricing could be seen as an attempt at price fixing, an anticompetitive practice. We allow the quality of our work to win business, and we don't pursue unfair advantages in the marketplace.

[Learn More Antitrust and Fair Competition Policy](#)

We use technology wisely

Doing what's right

We pioneer technology responsibly, innovating for the greater good of our business and for society as a whole. We don't allow technology to work against human interests or the law.

Why we do what's right

We believe in making improvements by using our imaginations to apply technology. As we innovate into new territory, we are careful to consider the impacts of new technologies. We also know that new laws and regulations will emerge in response to these technologies, and that such laws can vary greatly depending on country or region. We don't violate these laws, anywhere we do business.

How we do what's right

We use technology wisely when we:

- Design and implement our technology solutions with human needs in mind
- Optimize our technologies for business purposes only
- Make sure that our technologies use and deliver fair, actionable information, without bias
- Align our technologies with strict data privacy protocols and regulations
- Follow all policies, laws and regulations related to technology use and development

Bias and discrimination

Some have raised concerns that artificial intelligence and web-based algorithms have bias encoded into them. Because we are committed to inclusion and fairness, we design our solutions with these concerns in mind. We want our global reach to be authentic — truly representative of and tailored to the many kinds of people our innovations reach.

Doing what's right – in action

Q: I have been hearing a lot lately about the potential of technology to spread misinformation and even outright lies through “deep fakes.” What do we do as software engineers to prevent these kinds of things from happening?

A: We cannot be responsible for what happens outside HCLTech, even if we develop and use technologies that could be used for the wrong reasons. We believe that technology is a tool for improving human lives, even though some may use it for other purposes. As one of our software engineers, you do the right thing when you code ethically and lawfully, and when you raise important questions in the face of challenges.

We comply with government contracting rules

Doing what's right

We are privileged to work with and for governments, providing a variety of services and solutions. We embrace the responsibility that goes along with this work, and we bring our high ethical standards to these contracts.

Why we do what's right

Our pragmatic optimism guides us in working with all our clients, and we recognize that governments may have different requirements for doing business. Governments must be careful in using public funds, and we honor the faith and trust they put in us. In addition, government contracts may come with unique requirements and stronger penalties for violations. We are careful to follow these requirements and laws so that we can continue to help governments meet their technological challenges.

How we do what's right

We comply with government contracting rules when we:

- Fully meet all our commitments on government contracts
- Communicate honestly and transparently with governments on all aspects of a contract
- Don't offer anything of value to government officials or anyone working for a state-owned entity that exceeds the annual limit of USD \$50.
- Honor all terms of government contracts, including those that may create special rules around pricing and discounts
- Follow all policies, laws and regulations regarding government contracts and procurement processes

Government employees and agencies

In addition to leaders, representatives and their staff, governments employ many people for many different reasons. Governments are often responsible for running multiple agencies, and these agencies may themselves hire outside contractors. We must treat any of these entities with the same high ethical standards. Ultimately, we are serving the public whenever we partner with any government-related entity.

Doing what's right – in action

Q: I am working on a government contract to develop educational solutions. One of my contacts within the government is bothering me constantly for updates. What can I do?

A: Though you may find it distracting, you need to communicate with this contact. We are fully open, honest and transparent when working with the government, and we provide all required reports in a timely fashion. If

you feel this obligation is overwhelming, talk to your People Manager about receiving extra support.

We market our products honestly

Doing what's right

We are proud of our work and reputation. We uphold our integrity by sharing honest details about our products and services.

Why we do what's right

At HCLTech, an honest presentation of our products and services cannot help but be compelling. By bringing our expertise, resilience and imagination into everything we do, we know we can win business. Relationships built on transparency and trust create the best long-term value for our company.

How we do what's right

We market our products honestly when we:

- Don't exaggerate or misrepresent the capabilities of our products and services
- Estimate project timelines carefully and accurately
- Don't make disparaging remarks about our competitors
- Don't give legal advice
- Don't infringe on copyrights or other intellectual property
- Make sure all advertisements and other marketing materials follow all laws and regulations

Protecting our clients

Honest marketing creates accurate expectations from our clients. It also protects our clients and other consumers who may use our technological innovations. We are transparent about possible risks of our products and services so that others know how to use them responsibly.

Doing what's right – in action

Q: I'm writing marketing copy that needs to be published next week. One of the claims I want to make is supported by a preliminary report that won't be released until next month. Can I include the information from the report before it is published?

A: No. In your copy, you will have to change the claim and omit supporting information from the report. We don't publish marketing materials that are not backed by credible, verifiable research.

We work with suppliers who share our values

Doing what's right

When building and maintaining business partnerships, we seek not just economic value but also the right values. Our mission is to partner with those who share our high ethical standards.

Why we do what's right

Our suppliers and other business partners help us deliver high-quality solutions to our clients. We rely on them to support and collaborate with us as we pursue our mission. Any compromise in values or violations of the law

by our business partners could harm our reputation, so we must prioritize shared values and ethics when partnering with others.

Global Procurement Services (GPS)

HCLTech supports our business units' supplier management through Global Procurement Services (GPS). With a commitment to trust and transparency, GPS works globally and across all categories of products and services to enable third-party partnerships. GPS helps us work and win together, building strong supplier relationships, wherever we do business.

How we do what's right

We make sure to work with suppliers who share our values when we:

- Treat all suppliers and business partners fairly, regardless of the business value of the relationship
- Base all decisions on objective criteria such as price, availability and quality, as well as values
- Avoid even the appearance of a conflict of interest with regard to a supplier/business partner
- Don't offer or accept gifts or entertainment, especially when in the process of selecting a supplier/business partner
- Seek to understand our supplier/business partners through open, honest communication, especially if issues arise
- Don't share our supplier/business partners' confidential business information without permission
- Conduct due diligence to make sure all supplier/business partners follow the law and are committed to ethical business practices

Doing what's right – in action

Q: I was recently contacted by a sales agent who might be able to get us business in a country where we've never worked before. Can I talk to this agent on behalf of HCLTech?

A: No. You must first contact Global Procurement Services ("GPS") to begin the due diligence process for a new partnership. When this process has begun, your involvement may be requested in taking next steps to establish a partnership.

[Learn More Procurement Policy](#)

We do what's right for our company

We avoid conflicts of interest

Doing what's right

We put the interests of HCLTech ahead of our own personal interests, and we don't put ourselves in situations where our integrity or objectivity could be compromised.

Why we do what's right

Objective business decisions are the best business decisions. A conflict of interest can interfere with our ability to make decisions fairly and without bias. We avoid such conflicts so that we can collaborate on solutions for our clients and business partners without divided loyalties. Even the appearance of a conflict of interest can harm our reputation, so we disclose any relationships that could cause concern.

What is a “conflict of interest”?

A conflict of interest may arise when an employee’s personal interests are not consistent with the responsibilities of the position. A conflict of interest can involve any of the following:

- Personal relationships with family members or romantic partners
- Activities such as hobbies or outside employment
- Investments, including owning shares in HCLTech’s competitor
- Association, such as serving on the board of an outside organization

How we do what’s right

We avoid conflicts of interest when we:

- Make all business decisions objectively and without favoritism
- Remain alert for any situations or relationships that could compromise our objectivity
- Remove ourselves from hiring decisions involving friends or relatives, and make sure they don’t report to us as employees
- Don’t participate in the selection process for a supplier or business partner that employs a friend or relative
- Don’t hold a financial interest in a supplier or business partner of HCLTech
- Disclose holdings of 5 percent or more in a publicly traded company or a company in the same sector as HCLTech
- Disclose to a People Manager or HR any potential conflicts of interest that may affect us

Doing what’s right – in action

Q: One of our suppliers has asked me to join its advisory board. Would this be a conflict of interest?

A: Serving on a supplier’s advisory board might appear to give that supplier an unfair advantage. We avoid even the appearance of a conflict of interest. Discuss the matter with HR before accepting the invitation.

[Learn More Conflict of Interest Policy — Global](#)

We give and receive gifts and entertainment responsibly

Doing what’s right

We build positive relationships with our actual and potential clients, business partners or any third party that HCLTech does business with. That means that we don’t offer or accept gifts or entertainment that could influence a business decision.

Why we do what’s right

Our business partners help us to achieve our goals, and we enjoy the positive and productive relationships we build with them. To keep those relationships healthy, we don’t offer or accept inappropriate gifts or entertainment. Doing so could create an expectation of receiving a business favor in return. We build and maintain our business relationships with integrity because we believe our success comes from the quality of what we make and do.

Doing what’s right – in action

Q: I'm traveling on business to collaborate with one of our marketing firms. After our first day working together, the contact person at the firm offered me lunch at his company's expense. Can I accept?

A: Yes, you can accept, as long as the value of the lunch is modest. Be sure to follow all procedures for documenting the meal you received, and contact the Ethics and Trade Compliance (E&TC) team if you have any questions by writing to COBEC.Compliance@hcltech.com.

How we do what's right

We give and receive gifts and entertainment responsibly when we:

- Accept only gifts and entertainment that are nominal in value and infrequent
- Document any gifts or entertainment that we give or accept
- Don't ask for gifts or entertainment
- Don't offer or accept cash or cash equivalents, including gift cards
- Don't offer or accept gifts or entertainment intended to influence a business decision
- Don't offer or accept gifts or entertainment from a potential business partner during a bidding or contract negotiation process

What is a "business gift"?

A business gift is anything of value presented, accepted or won in the context of a business relationship, for which the recipient does not pay fair value.

Common examples of business gifts include meals, event or sport tickets and club memberships. Though these examples are not automatically inappropriate, if you are ever unsure, you should contact the Ethics and Trade Compliance (E&TC) team by writing to COBEC.Compliance@hcltech.com. Certain value restrictions may apply to even customary and infrequent gifts.

We do not engage in insider trading

Doing what's right

We don't use material, non-public information for personal financial gain, and we don't share such information with others.

Why we do what's right

In the course of doing our daily work, we may become aware of material, non-public information, from either HCLTech or one of our business partners. We don't use or share such information because doing so could distort financial markets. Insider trading gives an unfair advantage to those with access to non-public information, and it can lead to serious penalties.

What is "material, non-public information"?

Much of what we do as a business is not immediately made public for both practical and strategic reasons. If this information could be of value to investors, it is considered material and should not be shared. Some examples include:

- A pending merger or acquisition
- The upcoming resignation of an executive
- A planned stock repurchase or split

- A pending earnings report, particularly if its results are unexpected
- The upcoming purchase or sale of a major asset

How we do what's right

We avoid insider trading when we:

- Share inside information only with our co-workers who need to know for business purposes
- Don't share inside information with anyone outside HCLTech, including family members
- Don't buy or sell securities in HCLTech or any other publicly traded company when we have inside information
- Don't pass along inside information to someone who may buy or sell securities based on that information
- Don't suggest that others trade on inside information
- Follow all policies and procedures to protect inside information from accidental disclosure

Doing what's right – in action

Q: At dinner with my husband, I mentioned that one of our business partners was planning to buy back some of its own shares. He told me the next evening that he had bought shares in the company, assuming the value would go up after the buyback. Did I make a mistake?

A: Yes. You have inadvertently given your husband inside information that he then used to purchase a security. You must write to the Global Ethics Helpline immediately to determine the best course of action.

[Learn More](#)

[Code of Conduct on Prohibition of Insider Trading](#)

[Insider Trading Code](#)

[Policy for Inquiry in Case of Violations of Insider Trading Code](#)

[Policy for Taking Actions on Non-Compliance of Insider Trading Code of the Company](#)

We protect our information assets

Doing what's right

We are careful with the information assets that drive our business and allow us to communicate and accomplish our daily work tasks. We keep them protected at all times.

Why we do what's right

As an innovative technology company, we have developed and acquired a variety of information assets. These assets are a key part of our business, affecting everything from how we set ourselves apart strategically to how we manage client and employee data on a day-to-day basis. Our assets represent our decades of hard work, and protecting them will keep us innovating well into the future.

How we do what's right

We protect our information assets when we:

- Make sure that only authorized users have access to our networks, devices, applications and file directories
- Make sure company devices are safe and secure at all times, including removable media, both on- and off-site
- Don't open suspicious emails or click unfamiliar hyperlinks
- Follow best practices for managing and updating user IDs and passwords
- Make sure company records are organized, secure and easy to access
- Maintain and dispose of company records according to our records retention schedule
- Follow any legal hold that may be placed on a record
- Share confidential and proprietary information only with HCLTechies who need to know for business purposes
- Follow all policies and protocols for keeping confidential information secure
- Follow all policies, procedures and laws for protecting employee and client data

What is “confidential information”?

We create many kinds of confidential information in the course of doing business. Some examples include:

- Proprietary information, such as innovative designs and formulas
- Intellectual property, such as patents and trademarks
- Non-public financial information, including prices and earnings projections
- New product and marketing plans
- Client and supplier lists
- Research and development information
- Business plans, such as upcoming acquisitions and investments

Doing what's right – in action

Q: I was at dinner with an old friend, and he asked me about work. I got excited about a new product we're developing and told him about it. Was this a mistake?

A: Though it is unlikely your friend intends to use our product idea, you should not have shared that information. We invest a lot of time and energy into developing new products and ideas, and we do not want another company to profit from our investment. We don't share our confidential information, including new product development, with anyone outside HCLTech.

[Learn More](#)

[Acceptable Use of Proprietary and Confidential Information from Third Parties Policy](#)

[Records Retention and Destruction Policy](#)

We respect our financial assets

Doing what's right

We take responsibility for our financial health and viability as a business. To this end, we keep and maintain complete and accurate financial records.

Why we do what's right

Our financial assets play a role in defining how much and how quickly we can innovate. We keep complete and accurate records so that we can meet our obligations in the present and pioneer into the future. Maintaining proper financial records also builds confidence and trust among our investors, clients, business partners and other stakeholders.

Financial records

Our financial assets include our money and anything that can be converted to money, including stocks and bonds. We keep track of these assets through our financial records, which must be handled according to our retention policies and internal controls. Key financial records include:

- Balance sheets
- Income statements
- Cash flow statements
- Retained earnings statements
- Invoices

How we do what's right

We respect our financial assets when we:

- Maintain honest and accurate books and records, in accordance with generally accepted accounting principles and the law
- Don't set up secret or unrecorded funds for any reason
- Submit all financial books and records to auditors in a timely manner
- File all tax information accurately and in a timely manner
- Don't use financial records to mislead anyone about our business
- Don't falsify financial records or attempt to commit fraud of any kind
- Report any concerns about misleading or fraudulent records to a People Manager or the Global Ethics Helpline
- Follow all policies, internal controls and procedures, and the law when handling financial assets and records

Doing what's right – in action

Q: I work in accounting, and I recently got a surprising request from one of our client account team leads. She said that some of the revenue from the client needed to be reversed out for this quarter and added instead to next quarter's records. She couldn't explain why, and I've never had anyone request that before. What should I do?

A: You are right to be concerned. Contact the client account team lead to get a better understanding of the situation. Ask for documentation to explain the need for the change. We report our revenues accurately and in the correct period. If you are unable to get further clarification, discuss the matter with your People Manager.

[Learn More Anti-Money Laundering Policy — Global](#)

We value our time and physical assets

Doing what's right

While on company time, we focus on our jobs and our responsibilities as HCLTechies. We use company assets for business purposes.

Why we do what's right

Our colleagues, clients and shareholders count on us to make judicious use of company time and physical assets. When we misuse company time and assets, we waste precious resources and harm our ability to meet our business goals.

How we do what's right

We value our time and physical assets when we:

- Use company time and assets for business purposes
- Use common sense — occasional personal calls or emails are acceptable
- Report our time accurately
- Obtain prior approval for using HCLTech work product in an external venture
- Don't use HCLTech computers or equipment for outside businesses, or illegal or unethical activities such as gambling, pornography or other offensive content

Doing what's right – in action

Q: My People Manager always asks me to take care of his personal business during the workday. This includes things like picking up dry cleaning, bringing his dog to the groomer and shopping for personal gifts. Is this right?

A: No, it's not right. This is a misuse of company time. It also shows a lack of respect for you and the value you bring to HCLTech. Politely ask your People Manager to stop. If that doesn't work, or you are uncomfortable about it, report it to another trusted People Manager or the Global Ethics Helpline.

We safeguard our reputation

Doing what's right

We have built our reputation for ingenuity, resilience, creativity and innovation over decades, and we act to protect and maintain it.

Why we do what's right

How we present ourselves to the wider world affects our prospects for the future. Messages that misrepresent us can damage our hard-earned reputation. We are careful to speak both positively and honestly about HCLTech, and in many cases, HCLTech speaks best through designated spokespersons.

How we do what's right

We safeguard our reputation when we:

- Speak positively and honestly about HCLTech
- Don't share confidential or sensitive information
- Forward outside inquiries from the media or investors to our designated spokespersons
- Clearly distinguish our own views from those of HCLTech when using social media
- Clearly distinguish our political views from those of HCLTech
- Participate in politics on our own time, away from work

- Don't make political contributions on behalf of HCLTech
- Don't attempt to lobby or influence government officials or representatives

Social media

Social media is a powerful way to build connections and share events, ideas and information. However, social media must be used responsibly. When posting to our personal social media accounts, we are courteous and respectful, and we don't portray our own views as those of HCLTech. If our role at HCLTech involves engaging with social media, we are positive and honest. In either case, we don't share sensitive or confidential information. By communicating ethically, we make sure that social media only enhances our reputation.

Doing what's right – in action

Q: I was at a cybersecurity conference when an investor approached me with some questions he wanted to ask. I told him a little bit about why I was at the conference and then excused myself. Was that the right thing to do?

A: Yes. We do not discuss HCLTech business with outside investors or media unless we have prior authorization. In the future, you may share the contact information of our designated spokespersons with anyone who has similar inquiries.

[Learn More Social Media Policy](#)

We do what's right for our communities and our planet

We honor our ESG commitments

Doing what's right

We create long-term value for all our stakeholders, and making and honoring our ESG commitments helps us do that.

Why we do what's right

The longevity of our business depends on sustainability. To achieve sustainability, we must work with a number of stakeholders, including our suppliers, clients and organizations such as the United Nations. Our environmental, social, and governance (ESG) commitments set clear and specific goals for how we help both HCLTech and our planet thrive.

How we do what's right

We honor our ESG commitments when we:

- Attend all ESG trainings and meetings, and remain informed about our ESG commitments
- Design our business processes to run sustainably
- Foster Diversity, Equity and Inclusion in our work culture
- Partner with suppliers who share our ESG commitments
- Hold ourselves accountable for meeting our high ethical standards
- Follow all policies and procedures related to our ESG Commitments

[Learn More](#)

Corporate Social Responsibility Policy

Energy Policy

Environmental Policy

We protect our planet

Doing what's right

We take responsibility for protecting our planet and minimizing our impact on the environment.

Why we do what's right

Our business affects the natural environment, and we rely on that environment to provide many of the resources we need to do business. By applying our ingenuity to environmental issues such as emissions and waste, we do what's right for our planet. And because of the resources we preserve and the efficiencies we achieve, we also do what's right for our business.

How we do what's right

We protect our planet when we:

- Recycle and manage our waste according to our policies and procedures
- Turn off lights, machinery and electronics when not in use
- Participate in power down week to reduce carbon footprints
- Innovate to design sustainable business processes and practices across our global organization
- Carpool, use public transit or bike/cycle to work
- Report any spills, leaks or breaches of our environmental policies to your People Manager or the Global Ethics Helpline
- Follow all environmental policies, procedures and laws

[Learn More](#)

Corporate Social Responsibility Policy

Energy Policy

Environmental Policy

We respect human rights

Doing what's right

We respect and protect human rights, wherever we do business, and we expect the same of our business partners. Human trafficking and modern slavery have no place in any part of our business.

Why we do what's right

Because of our commitment to humanity and our peoplecentric culture, we respect the rights of all individuals and the dignity of labor. As a global company with a large workforce, we have a special responsibility to uphold human rights. By rejecting child labor, unsafe working conditions, human trafficking and other violations of human rights, we improve working conditions for all and set an important ethical standard.

How we do what's right

We respect human rights when we:

- Make sure all our HCLTechies work in safe conditions for fair pay
- Select business partners with a demonstrated commitment to protecting human rights
- Don't use child or prison labor for any reason, anywhere we do business
- Report any violations of human rights, anywhere in our supply chain, to your People Manager or the Global Ethics Helpline
- Follow all policies, procedures and laws related to human rights

The International Labour Organization (ILO) and the United Nations (UN)

The ILO has prohibited all forms of child labor, as well as modern slavery. The United Nations Guiding Principles on Business and Human Rights (UNGPs) share these principles. We follow the standards set by these organizations. Forced labor of any kind violates our policies, values and international law.

Doing what's right – in action

Q: I was recently at a supplier location for a meeting, and I noticed that the employees looked very tired and overworked. They appeared to be working without breaks or shift changes. Could this be a human rights violation?

A: It may be. Report your concerns to the Global Ethics Helpline. We don't look the other way when human rights violations may be taking place.

[Learn More](#)

[Corporate Social Responsibility Policy](#)

[Human Rights Policy](#)

We stay out of politics

Doing what's right

HCLTech is apolitical. As a company, we do not contribute to or work for any political candidate or party anywhere in the world.

Why we do what's right

Our HCLTechies and our clients come from all walks of life and hold various political beliefs. We honor those beliefs, as long as they are peaceful and do not advocate harm against others. As a company, while true to our values, we stay out of politics.

How we do what's right

We stay out of politics when we:

- Don't contribute to, work for or endorse any political candidate or party on behalf of HCLTech
- Don't use company time, finances or other assets to benefit a political candidate or party
- Encourage our HCLTechies to participate in the political process on their own time

- Engage in lawful lobbying activities to advocate for government policies, programs, laws and regulations that benefit HCLTech and our clients

We contribute to our communities

Doing what's right

Community is at the heart of everything we do, which is why we give back. We strive to be a source code for socioeconomic and environmental development.

Why we do what's right

Guided by our values of equity, dignity and equal opportunity, we give back in ways that matter. Through meaningful and strategic partnerships, we effectively leverage the “power of many” to positively impact lives and spread smiles. We work to make this world a better place, in all possible ways.

How we do what's right

We best contribute to our communities when we:

- Nurture clean, green and healthy communities
- Empower all community members to reach their full potential
- Promote responsible volunteerism
- Make sure our charitable activities don't interfere with our work
- Don't pressure others to participate in or donate to our favored charities
- Establish international standards of strategic planning and implementation
- Measure our impact

Our 10 Commandments of Corporate Social Responsibility (“CSR”)

HCLTech invests in people, the planet and partnerships for prosperity and peace. We are guided in these efforts by our 10 Commandments, or 10 C's.

- Clarity
- Choice
- Catalyse
- Co-create
- Comprehensive
- Continuous
- Compassion
- Convergence
- Credibility
- Capital

HCL Foundation

The HCL Foundation delivers the CSR agenda of HCLTech through its flagship programs and special initiatives. As a not-for-profit organization, it strives to contribute toward national and international development goals, bringing about positive impact in the lives of people through long-term sustainable programs.

Learn More Corporate Social Responsibility Policy

Resources

Ethics & compliance at HCLTech

To evaluate reports and complaints, serve as a resource and facilitate investigations, HCLTech has a standing Ethics Committee. The committee is made up of at least five members and is led by our General Counsel. The other members are drawn from our Finance, Legal and HR departments.

An independent Ombudsperson will make initial evaluations of reports and complaints. The Ombudsperson is independent of HCLTech and serves as a neutral party. Once the Ombudsperson has made a judgment, the report or complaint is forwarded to the Ethics Committee or the Audit Committee. Reports involving high-level executives, directors or chairpersons go the Audit Committee. All others are the responsibility of the Ethics Committee.

Through these bodies and processes, we hold ourselves accountable to our Code, our values and the law. For any violations, appropriate disciplinary action, up to and including termination of employment, will be determined by our ethics and compliance procedures.

Helpful resources and contacts

If you ever suspect anyone of a violation, or need help with an ethical matter, remember to use one or more of these options:

- Report the issue to the Global Ethics Helpline
- MyHCLTech > Top Ribbon (Main Menu) > Ethics Helpline
- In Germany and the Netherlands, write to whistleblower@hcltech.com
- Discuss the issue with your People Manager

Policies

Acceptable Use of Proprietary and Confidential Information from Third Parties Policy

Anti-Bribery and Anti-Corruption Policy — Global

Anti-Money Laundering Policy — Global

Antitrust and Fair Competition Policy

Business Gift and Entertainment Policy — Global

Conflict of Interest Policy — Global

Corporate Social Responsibility Policy

Energy Policy

Environmental Policy

Export Compliance Policy

Human Rights Policy

Insider Trading Code

Policy for Inquiry in Case of Violations of Insider Trading Code

Policy for Taking Actions on Non-Compliance of Insider Trading Code of the Company

Procurement Policy

Record Retention and Destruction Policy

Social Media Policy

Whistleblower Policy — Global

Annexure

Revision History:

Version	From	To	Description	Author	Approved By
1	01 Jan 2012	22 Jan 2017	First Copy	C&B Team	C&B Head
2	01 Mar 2013	22 Jan 2017	Revision	C&B Team	C&B Head
3	01 Mar 2014	22 Jan 2017	Reviewed by external counsel – no changes made	HR Policy & Compliance Team	HR Policy & Compliance Head
4	01 Mar 2015	22 Jan 2017	Reviewed by GCT– no changes made	HR Policy & Compliance Team	HR Policy & Compliance Head
5	23 Jan 2017	24 Jan 2017	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head

6	25 Jan 2017	21 May 2020	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
7	22 May 2020	14 Sep 2020	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
8	15 Sep 2020	04 Jan 2021	Revision	HR Policy & Compliance CoE	General Counsel
9	05 Jan 2021	13 Jul 2021	Revision	HR Policy & Compliance CoE	Top Management
10	14 Jul 2021	14 Mar 2022	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
11	15 Mar 2022	26 Jan 2023	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
12	27 Jan 2023	14 June 2023	Revision	HR Policy & Compliance CoE	Top Management
13	15 June 2023	31 Mar 2024	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head

Glossary

Term	Definition
	All rights reserved (No part of the document may be copied, reproduced, stored in any retrieval system, or transmitted in any form or by any means, electronically, mechanically, or otherwise without prior written permission)

We/Us/Our/HCLTech/the Company	HCL Technologies and/or its subsidiaries
You/Your/Employee/HCLTechie	Every person who works at the Company including the senior management, or serves on its Board of Directors
COBEC/Code	This document, as we may amend or add to it from time to time

Keywords

Policy, Code of Business Ethics and Conduct, HCLTech, Ethics Policy, Compliance, Transparency, Accountability, Ethics, Trust, Conflict of interest, Fraud, Corporate Governance, COBEC, Code

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.

Policy History

Modified Date	Version No.	From	To	Reason for creation / updation	Author	Approved by
15 Nov, 2024	1	1 Apr, 2024	5 Sep, 2024	Launch on Policy Studio	Ruchi Smita Khandai(Geo HR Serv - Trans - Trans - Offshore)	Srinivasan Govindan(Ent HR-I&C-I&C-Policy-Policy)
18 Feb, 2025	2	6 Sep, 2024	16 Feb, 2025	Business Requirements	Ruchi Smita Khandai(Geo HR Serv - Trans - Trans - Offshore)	Srinivasan Govindan(Ent HR-I&C-I&C-Policy-Policy)
18 Feb, 2025	3	17 Feb, 2025		Complete revision to COBEC as per industry standards	Ruchi Smita Khandai(Geo HR Serv - Trans - Trans - Offshore)	Srinivasan Govindan(Ent HR-I&C-I&C-Policy-Policy)