

Environmental policy

1. Purpose

HCLTech is committed to fostering a safe and sustainable environment through structured and accountable practices. This policy outlines our environmental commitments and their impact on society and the planet. We extend our environmental responsibilities to our value chain partners, encouraging alignment with our sustainability principles to collectively reduce environmental impact.

2. Scope

This policy applies to all operations, facilities, employees, contractors, vendors, partners and stakeholders associated with HCLTech and its subsidiaries. It covers all activities under organizational control that may affect the environment, including products, services, and processes. The policy integrates environmental considerations into strategic planning and establishes organizational alignment with legal and other applicable requirements. It outlines our commitment to pollution prevention, sustainable resource use and continual improvement

3. Policy Statement

Top Management Commitment

HCLTech recognizes its responsibility to future generations and its role in addressing global environmental challenges. We commit to proactively managing environmental impacts, risks and opportunities across our operations and value chain.

Environmental Management Excellence

HCLTech establishes a robust environmental management framework to guide environmental performance across its operations, services, and products. This policy

- Provides a framework for setting and reviewing environmental objectives and targets.
- Ensures compliance with all applicable environmental laws and regulations.
- Seeks to minimize the organization's ecological footprint through responsible stewardship of natural resources, encompassing energy, water, waste and other environmental aspects, with a strong focus on efficiency and sustainable practices.
- Advances sustainable procurement by prioritizing environmentally responsible sourcing and supplier engagement.
- Supports sustainable sourcing by working closely with suppliers, encouraging responsible supply chain practices, providing sustainability related learning and data sharing support, and using suitable platforms to track environmental performance.
- Promotes environmental awareness and capability building by supporting sustainability related learning and training initiatives for employees and relevant value chain partners through appropriate internal learning platforms.
- Prevents pollution and reduces waste by applying the principles of refuse, reduce, reuse, repurpose, and recycle.
- Fosters environmental stewardship through local community engagement.
- Promotes biodiversity within and beyond our operational boundary.

HCLTech implements its environmental commitments through appropriate resources, systems, and controls by:

- Leveraging advanced technologies such as Artificial Intelligence, Internet of Things, and data analytics to enhance environmental performance.
- Embedding environmental requirements across procurement, operations, and supplier engagement.

Environmental performance is monitored and evaluated against defined objectives, targets, and compliance obligations. Based on performance reviews and evaluation outcomes, HCLTech commits to continual improvement of environmental performance through corrective and preventive actions, strengthening the effectiveness of its environmental management system.

Water stewardship and energy management are governed through their respective standalone Water Policy and Energy Policy, which outline specific commitments, targets and performance mechanisms aligned with HCLTech's overall environmental sustainability objectives.

Objectives and Targets

- We establish measurable environmental objectives and targets, including:
- Achieve net-zero by the year 2040.
 - 50% reduction in absolute Scope 1 and Scope 2 emissions by FY30 from the baseline year of FY20.
 - 80% of electricity usage to be from renewable energy sources by the year 2030
 - 42% reduction in absolute Scope 3 emissions by FY30 from the baseline year of FY20.
 - Maintain zero-waste-to-landfill at all owned facilities.

Communication

This policy is communicated organization-wide and made publicly available through official channels. HCLTech conducts training and awareness programs for relevant personnel and reviews the policy at least annually to ensure its continued relevance, effectiveness, and alignment with evolving regulatory requirements and stakeholder expectations.

Governance

The Board of Directors provides oversight of environmental commitments and related risks, supported by the ESG and Diversity, Equity and Inclusion (ESG & DEI) Committee, which ensures the allocation of appropriate resources and strategic direction.

Grievance Mechanism

- HCLTech maintains a transparent grievance mechanism enabling stakeholders to raise concerns related to environmental management. Complaints are handled confidentially with timely acknowledgment, investigation, and resolution, ensuring non-retaliation.
- Internal grievances may be raised through Incident Management – Occupational Health, Safety and Environment ([IMSHS](#))
 - External stakeholders may raise concerns via whistleblower@hcltech.com or the Ethics Helpline (MyHCLTech → Top Ribbon → Ethics Helpline).

4. Roles and Responsibilities

Role	Key Responsibilities
Risk & Compliance Apex Committee (RCAC)	Shall be responsible for providing necessary guidance to the Risk and Compliance function at HCLTech and ensuring oversight of risk and compliance operations across the organisation.
Compliance, Legal and Operational Risk Council	Shall be responsible for reporting and recommending actions on enterprise-wide risk matters to RCAC
ESG & DEI Committee of the Board	Shall be responsible for approving annual objectives and KPI set; overseeing disclosures, allocation of resources.
Policy Review Board (PRB)	Shall be the apex authority that reviews and approves HCLTech Policies as per the defined frequency.
Corporate Sustainability	Provides support as subject matter expert
GWS Function	Shall be responsible for maintaining EMS controls in its area of operations; ensuring compliance with applicable environmental laws; monitoring KPIs; leading EMS audits and improvement projects, implementing operational controls, maintaining environmental permits, managing waste and contractors working under it; reporting of environmental performance to ESG committee. Shall prepare and update the Policy as and when required.
Procurement	Integrate environmental requirements and life-cycle criteria into sourcing and contracts; support supplier awareness, ESG-related training, and capacity-building efforts to strengthen responsible supply-chain practices
Employees	Follow environmental policy & procedures strictly, report hazards/spills, and actively support environmental initiatives.
Contractors	Shall be responsible for adhering to HCLTech established policies and procedures; deploying competent workers at site; reporting deficiencies in equipment and processes to the concerned area owner; maintaining integrity.
Internal Audit / Compliance	Shall be responsible for Identifying non-compliance risks before regulatory inspections; Validating accuracy of compliance registers; Testing effectiveness of compliance monitoring mechanisms
Any business function	Shall ensure compliance with environmental policy guidelines through active participation in environment management and pollution prevention programme.

5. Policy Development and Review

- Policies must:
- Follow a standardized structure and template.
 - Be reviewed at least annually or upon regulatory/operational changes.
 - Include version control, approval records, and ownership details.

6. Regulatory Linkages

- This policy framework supports compliance with:
- ISO14001:2015 - Environmental management system.
 - GRI Standards - Global Reporting Initiative (GRI) Sustainability Reporting Standards
 - Business Responsibility and Sustainability Report (BRSR) - SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
 - TCFD - Task Force on Climate-related Financial Disclosures (*for climate risk governance and transparency*)
 - SBTi - Science Based Targets initiative (*for science-aligned emissions reduction targets*)
 - CDP - Climate Disclosure Project (*for climate and environmental performance disclosure*)

The following internal policies support the implementation of this Environmental Policy, where applicable:

- Water Policy
- Energy Policy
- Green Procurement Policy

7. Non-Compliance

Non-retaliation is ensured, and feedback supports continuous improvement. Compliance with this policy is mandatory. Non-adherence will result in appropriate action as determined by the organization’s governance and disciplinary/ authorized committee.

8. Approval and Revision History

Version From To Description Author Approved By

Version	From	To	Change description	Proposed By	Author	Approved By
NA						

9. Glossary

Term	Definition
NA	

10. Owner of Policy

Policy Owner & Custodian: GWS Department

11. Approving Authority

Approved By (Name, Designation & Signature) –
C Vijayakumar
Chief Executive Officer and Managing Director | HCLTech

Effective Date:

24th June, 2026



C VIJAYAKUMAR
CEO & Managing Director
HCLTech