

Water policy

As a member of the United Nations Global Compact, we are taking a leading role in responding appropriately to reduce environmental impact and addressing concerns on climate change and water scarcity.

1. Purpose

HCLTech is committed to integrating sustainability as a core element of its business and growth. This Water Policy outlines the organization's approach to responsible water management, supporting environmental stewardship and climate action. The policy aims to reduce water footprint across operations and encourage our value chain partners to align with HCLTech's water sustainability goals.

2. Scope

This Water Policy applies to all operations, facilities, employees, vendors, partners, and stakeholders associated with HCLTech and its subsidiaries. It covers all locations and activities, products, services, and processes under the organization's control that may impact water resources.

The policy is appropriate to the nature and scale of HCLTech's operations and reflects the organization's commitment to fulfilling applicable legal and other water-related obligations, preventing pollution, promoting sustainable water use, and achieving continual improvement of water performance. The policy also provides a structured framework for setting and reviewing water objectives, integrating water considerations into planning and decision-making.

3. Policy Statement

Top Management Commitment

HCLTech acknowledges its responsibility to future generations and its role in addressing water scarcity and conservation. As a participant in global sustainability initiatives including the United Nations Global Compact, HCLTech is committed to reducing environmental impacts related to water use and strengthening responsible water stewardship across its operations and value chain.

Water Management Excellence

HCLTech strives for excellence in water management through the following commitments:

- Fulfill all applicable legal, regulatory, and customer requirements related to water use and management.
- Recognize water as a shared resource among industry, communities, and ecosystems, ensuring that operations do not adversely impact this balance.
- Prevent pollution of surface water, groundwater, and other water bodies by adopting a zero-discharge philosophy wherever applicable and technically feasible and maintaining water and waste-storage infrastructure to appropriate technical standards.
- Understand and manage water footprint by maintaining water balance strategies that minimize freshwater withdrawal and optimize usage.
- Undertake periodic water risk assessments to inform management strategies and resilience planning.
- Promote sustainable water use by implementing best practices such as rainwater harvesting, wastewater treatment, reuse, and recycling.
- Engage proactively with vendors and suppliers to identify and manage water-related risks across the value chain.

- Collaborate with customers where relevant to develop solutions that support effective water management and sustainability outcomes.
- Apply advanced technologies for water conservation, monitoring, treatment, and reuse to enhance water efficiency.
- Support community initiatives aimed at improving water security and awareness.

HCLTech also promotes ongoing capacity-building and skill development on environmental sustainability topics through appropriate learning platforms and initiatives to support effective policy implementation for:

- Continual improvement of water performance and water management practices.

Objectives and Targets

In line with this policy, HCLTech establishes measurable water sustainability objectives and targets, including but not limited to:

- Maintain water consumption intensity below 10 liters per employee per day across facilities.
- Reuse at least 98% of treated wastewater for non-potable applications (such as flushing and landscaping) at all HCLTech-owned campuses in India and leased facilities solely occupied by HCLTech.
- Conduct water audits at defined intervals to monitor performance and identify opportunities for improvement.

Communication

The Water Policy is communicated to all relevant personnel and made publicly available through official channels. Operational controls are maintained to support effective implementation. The Policy and associated performance are reviewed at least annually to ensure continued relevance, effectiveness, and alignment with evolving regulatory requirements and stakeholders' expectations. Appropriate training and awareness programs are provided to support effective implementation and promote water stewardship.

Governance

The Board of Directors provides oversight of the organization's water-related obligations and supports the achievement of organization-level water goals. Implementation, monitoring, and review are managed through the ESG and Diversity, Equity and Inclusion (ESG & DEI) Committee, ensuring availability of adequate resources.

Grievance Mechanism

HCLTech provides a transparent grievance mechanism that enables stakeholders to raise concerns related to this policy. Complaints may be submitted through whistleblower@hcltech.com or via the **Ethics Helpline** (*MyHCLTech* → *Top Ribbon (Main Menu)* → *Ethics Helpline*). All complaints are handled confidentially, with timely acknowledgment, investigation, and resolution. The process ensures non-retaliation and supports continuous improvement through regular monitoring and reporting.

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	Approve targets and KPI suite; oversee disclosures and stakeholder communications, allocation of required 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	Implement water controls to its area of operations; maintain permits; manage water infrastructure and suppliers. Maintain water risk assessments; monitor KPIs; lead audits and improvement plans. Shall prepare and update the Policy as and when required.
Procurement	Embed water stewardship requirements into sourcing, contracts and supplier engagement.
Employees	Follow procedures; report leaks, non-conformities and incidents; participate in initiatives.
Contractors	Shall ensure compliance with established rules and regulations applicable to their business where they operate; deploy competent workers at HCLTech offices; procure work permits appropriate to the activity; provide personal protective equipment free of cost to its workers appropriate to the activity.
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 water policy & guidelines through active participation in water management initiatives and training programmes.

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.

7. Non-Compliance

Compliance with this policy is mandatory. Any failure to adhere to its provisions will result in appropriate consequences, as determined by the organization’s governance and disciplinary framework.

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