CORPORATE SOCIAL RESPONSIBILITY POLICY
HCL TECHNOLOGIES LIMITED

Revision History

Version	Description	Effective date	Approved by
1.0	Adoption of the Corporate Social Responsibility Policy' pursuant to the Companies Act, 2013	April 15, 2014	Board of Directors
1.1	This `Corporate Social Responsibility Policy' replaces the earlier `Corporate Social Responsibility Policy'.	April 21-23, 2021	Board of Directors
1.2	Modification to the Corporate Social Responsibility Policy in accordance with the amendment in Schedule VII of the Companies Act, 2013	May 27, 2026	Due to amendment in law, changes have been suitably incorporated in accordance with the Policy.

PREAMBLE

HCL Technologies Limited ("HCL Technologies" or "HCLT" or the "Company") contributes progressively to the socio-economic and environmental advancement of the planet with 'Corporate Social Responsibility' ("CSR") at the very core of its existence.

Aligned to the Global Sustainable Development Goals ("SDGs"), it stands firmly against exploitation of all sentient beings and natural resources, and advocates relentlessly for conservation of our planet and respect for all lives.

A statement of intent, the CSR Policy of the Company (the "Policy") vividly lays out its progressive developmental agenda. More than just a compliance document, it binds us to the highest standards of environmental sustainability, and reaffirms our commitment to holistic integrated development, fueled by sustainable business practices.

Guided by the values of equity, dignity and equal opportunities, the ethos of 'giving back', in ways that matter, is enshrined in its culture. Through meaningful and strategic partnerships, it effectively leverages the 'power of many' to positively impact lives and spread smiles, thus making this world a better place, in all possible ways.

In context of India, words and expressions used and not defined in this Policy but defined in the Companies Act, 2013 (the "Act") read with the Rules made thereunder, shall have the same meanings respectively assigned to them in the Act read with the Rules made thereunder.

1. OBJECTIVES OF THE POLICY

The Policy defines the intent, objectives and approach of the Company and lays down the guiding principles for selection, implementation, monitoring and evaluation of CSR activities as well as formulation of the Annual Action Plan, for ensuring growth and advancement of society and conservation of natural resources.

2. ABOUT HCL TECHNOLOGIES LIMITED

HCL Technologies Limited empowers global enterprises with technology for the next decade, today. The Company's Mode 1-2-3 strategy, based on its deep-domain industry expertise, client-centricity, and entrepreneurial culture of ideapreneurship™, enables businesses to transform into next-gen enterprises.

The Company offers its services and products through three business units: IT and Business Services (ITBS), Engineering and R&D Services (ERS), and Products & Platforms (P&P). ITBS enables global enterprises to transform their businesses through offerings in the areas of applications, infrastructure, digital process operations, and next generation digital transformation solutions. ERS offers engineering services and solutions in all aspects of product development and platform engineering. P&P provides modernized software products to global clients for their technology and industry-specific requirements. Through its cutting-edge co-innovation labs, global delivery capabilities, and a broad global network, the Company delivers holistic services in various industry verticals, categorized as Financial Services, Manufacturing, Technology and Services, Telecom and Media, Retail and CPG, Life Sciences and Healthcare, and Public Services.

With presence across the globe, the Company takes pride in its diversity, social responsibility, sustainability, and education initiatives. For more information, visit www.hcltech.com

3. CSR VISION & MISSION

VISION – To be a 'source code' for socio-economic and environmental development.

MISSION – To nurture clean, green and healthy communities where everyone is empowered and equipped to reach their full potential in partnership with its employees, communities and stakeholders, while promoting volunteerism and establishing international standards of strategic planning, implementation and measuring impact.

4. STRATEGY AND APPROACH – OUR 10 CSR COMMANDMENTS

The Company's corporate conscience is defined by not just one, but many meaningful voices. Its business objectives converge with social purpose, establishing it as a responsible business where growth and welfare of communities, specially of those in the neighborhood, and the protection of the environment, forms the bedrock of all its endeavours. The Company invests in people, planet, partnerships, prosperity and peace agenda to meet the 17 SDGs.

True to its DNA, the Company believes in developing 'source codes'. Its approach is determined by the 10 'Cs' or the 10 Commandments that guide the CSR efforts. These 'secular inclusive approaches' are the lodestar, the blueprints for replication, helping scale endeavours to different geographies and populations.

i. **CLARITY:** of thought, purpose and action. We design and implement impactful interventions to break the cycle of poverty in all its forms, be it social, economic, or environmental.

ii. **CHOICE:** the power or liberty to choose. We are conscious of the individual's '*right to choice*' and offer a bouquet of innovative services, opening up multiple points of engagement.

iii. **CATALYSE:** spark a path for self-determination. We are mindful of people's own agency and ability to effect change, and provide relevant opportunities for meaningful growth.

iv. **CO-CREATE:** think and act together to drive progress. We blend the wisdom of communities with scientific rigor to seed and propel transformative change.

v. **COMPREHENSIVE:** an ecosystem of well-being: Our interventions target areas critical for a person's development - health, education, sports, livelihoods and skilling, and the environment.

vi. **CONTINUOUS:** Life cycle approach: We leverage the Integrated Community Development Approach (ICDA) impacting every stage of life.

vii. **COMPASSION:** rooted in empathy and deep underlying concern for the well-being of people. Our programmes, interventions and strategies specifically target the unreached and ultra-poor.

viii. **CONVERGENCE:** Unifying stakeholders. We bring our communities, customers, employees, non-profits and Government bodies together, leveraging the strength, experience and expertise of each stakeholder for greater good.

ix. **CREDIBILITY:** holding ourselves to exacting standards of transparency and governance, we are accountable to our employees, partners and communities.

x. **CAPITAL:** Going beyond the financial. We view capital as more than just finance. Creating safe spaces that energize and inspire, we actively build human, developmental and environmental capital.

- Human Capital – creating access to knowledge, technical know-how and an agency of skills that maximize human potential leading to empowered, self-sufficient, gender equal and inclusive communities;
- Developmental Capital – enabling rich social networks, physical assets and institutional strength that nourish a culture of self-reliance and sustained growth;

- Environmental Capital – investing in efficient and effective green solutions that nurture and conserve our planet.

  Fundamental to the approach is the recognition of technology as a force multiplier and its deployment as a key instrument of transformational change.

5. HCL FOUNDATION

To meet its goals, the Company drives its corporate social responsibility agenda through its CSR arm, HCL Foundation, a Public Charitable Trust.

Established in 2011, HCL Foundation's belief in the power of communities to lift themselves out of poverty and lead a life of dignity and self-respect lies at the heart of all its initiatives.

5.1 KEY CSR STREAMS FOR HCL FOUNDATION

HCL Foundation has been set up to take up programmes and projects as part of its CSR mandate which are aligned to the 17 SDGs and the national missions. The Company's CSR agenda is also aligned with Schedule VII of the Companies Act, 2013. All CSR initiatives are inclusive, gender transformative, with special attention to the ultra-poor, people with disabilities and environment conservation.

EARLY CHILDHOOD CARE & DEVELOPMENT (ECCD): We view ECCD as a powerful equalizer and work to ensure the holistic development of all children under 8 years of age. Our interventions provide stimulation and early childhood education, improve access to home and centre based quality care, and empower parents and caregivers.

HEALTH: Universal, equitable and comprehensive, well-being oriented health for all, which is accessible, available, affordable and acceptable, is vital to our health stream. Through strategic interventions, we disseminate critical information, break taboos, seed responsible health seeking behaviour, invest in health systems strengthening and provide services, when necessary.

EDUCATION: We facilitate quality education, nurture critical thinking and equip children and adults with 21st century life skills. Adopting strategic routes like sports, scholarships, remedial and bridging endeavours, strengthening of state systems, we create avenues of access.

Leveraging innovative technology, we promote gender transformative and inclusive education.

SKILL DEVELOPMENT & LIVELIHOOD: Encompassing agriculture productivity improvement, skill development of youth and women, entrepreneurship development through micro-enterprises, and strengthening government systems, we facilitate sustainable livelihood opportunities. We actively impart career guidance, counselling, mentorship to our communities, and in deserving cases, invest in their venture through seed capital.

WATER, SANITATION & HYGIENE (WASH): We focus on equitable and adequate access to sanitation and safe drinking water with full community engagement and participation. This includes promotion of safe WASH practices in schools and communities, management of waste water, creation of proper drainage systems, safe disposal of solid and liquid waste.

ENVIRONMENT: We protect, conserve, restore, enhance indigenous biodiversity and promote clean energy solutions. Reviving flora and fauna, restoring water bodies, expanding green cover, conserving wildlife and increasing environmental awareness are critical priorities. Investing in infrastructure, we are establishing renewable energy-based ecosystems for local economic development.

DISASTER RISK REDUCTION & RESPONSE: Given the recurrent and unpredictable nature of disasters and humanitarian crisis, we are developing long term strategies, addressing all stages. From prevention – resilience building; to immediate relief - efficient distribution of essential goods and services; to rehabilitation - putting lives and nature back on track.

GENDER & INCLUSION: By identifying and challenging socio-economic and cultural barriers, we are building inclusive communities and institutions where everyone irrespective of gender, age, religion and beliefs, can access critical resources necessary for leading a fulfilling life.

Child protective strategies, inclusion, gender transformative approaches and technology enabled solutions remain central in all initiatives of HCL Foundation.

6. GOVERNANCE

6.1. GLOBAL

Governance of CSR activities is taken up by the CSR Committee of the Board of the Company in a transparent, accountable, and robust manner both globally as well as locally for the concerned geography.

6.2. INDIA

CSR activities are taken up PAN India as part of the CSR obligations of the Company.

6.2.1 Composition of CSR Committee:

The CSR Committee of the Company has been constituted in accordance with the Act read with the Rules made thereunder.

6.2.2 Responsibilities of the CSR Committee:

i. Formulate / amend and recommend to the Board of Directors of the Company:

a) The CSR Policy of the Company.

b) The Annual Action Plan in pursuance of the CSR Policy, which shall include:

- The list of CSR programmes or projects approved to be undertaken in areas or subjects specified in Schedule VII of the Act.
- The manner of execution of such programmes or projects.
- The modalities of utilization of funds and implementation schedules for the programmes or projects.
- Monitoring & Reporting mechanism for the programmes or projects; and
- Details of Need and Impact Assessment if any, for the programmes or projects.

ii. Recommend the amount of expenditure to be incurred on CSR activities.

iii. If the amount spent in a financial year is less than the statutory obligation, take note of the reasons for not spending the entire mandatory amount, and recommend to the Board on treatment of unspent amount as per the provisions of the Act and the Rules made thereunder.,

iv. In any financial year, if the CSR spend is in excess of the amount obligated in terms of the Act, recommend to the Board set-off of excess spent as per the provisions of the Act and the Rules made thereunder.

v. Monitor the CSR Policy and the Annual Action Plan for the CSR activities of the Company from time to time.

vi. Institute a transparent monitoring mechanism for implementation of CSR projects or programs or activities undertaken by the Company.

vii. Review the need for Impact Assessment, if any, for the projects or programmes.

6.2.3 Responsibilities of the Board:

i. Approve the CSR Policy and any amendments thereof and the Annual Action Plan, on the basis of the recommendation of the CSR Committee.

ii. Disclose the CSR Policy as per the requirements specified in the Act and the Rules framed thereunder.

iii. Ensure that the CSR activities are undertaken by the Company as per the CSR Policy.

iv. Ensure that the Company spends the amount indicated in the Act and the Rules framed thereunder in every financial year in pursuance of its CSR Policy.

v. If the amount spent in a financial year is less than the statutory obligation, take note of the reasons for not spending the entire mandatory amount, and ensure that the unspent amount is treated as per the provisions of the Act and the Rules made thereunder.

vi. In any financial year, if the CSR spend is in excess of the amount obligated in terms of the Act, set-off of excess spent as per the provisions of the Act and the Rules made thereunder.

vii. Ensure that the CSR funds disbursed have been utilized for the purposes and in the manner as approved and obtain a certificate from the Chief Financial Officer of the Company to its effect.

viii. Alter the Annual Action Plan at any time, if required, during the financial year based on reasonable justification and on the recommendation of the CSR Committee.

ix. Monitor the implementation of projects with reference to the approved timelines and year-wise allocation as per the provisions of the Act and the Rules.

x. Ensure that the Company undertakes impact assessment of the programmes or projects as per the provisions of the Act read with the Rules made thereunder

and take note of the impact assessment reports, if any, undertaken by the Company.

7. IMPLEMENTATION

7.1. GLOBAL: The Company shall comply with local CSR Policy frameworks, if any, for Geographies outside India.

7.2. INDIA: The Company shall implement the CSR activities in consonance with the Act, Rules, as may be applicable.

The Company shall take up CSR activities in India primarily through HCL Foundation, which may implement the CSR programmes/projects of the Company either on its own or it may engage other registered Public Trust(s) / registered Society(ies) / Company(ies) incorporated under Section 8 of the Act/ Government Departments / Schemes or any other suitable implementing organization/agency eligible to undertake CSR activities in compliance with the Act, and the Rules made thereunder.

The Company may also take up any direct CSR activity(ies) as may be decided by the Company's Board of Directors.

The Company may also explore possibilities for collaborating with other Corporate / National / Multi-lateral / Bi-lateral / International Agencies in order to synergise its efforts and maximize financial resources as well as outcomes and impact., subject to the approval of the CSR Committee.

7.2.1.1 FINANCIALS

i. The Company shall spend the amount indicated in the Act and the Rules to fulfill its CSR objectives. Any short / excess spent shall be treated as per the provisions of the Act.
ii. Programmes/projects shall be identified, and budgets shall be allocated for such activities through a process incorporating identification of suitable implementation agencies, need assessment (where required) and clear outlining of desired outcomes.

iii. In the event the Company makes any surplus from its CSR programmes/projects, the same shall not form part of the business profit and shall be treated in the manner as mentioned in the Act and the Rules made thereunder.

iv. Salary of staff engaged in CSR activities may be included in the CSR expenditure.

v. CSR expenditure of the Company may include creation or acquisition of capital assets which shall be held by HCL Foundation/beneficiaries/Public Authority.

vi. Expenditure towards need and impact assessment of CSR programmes/ projects shall be booked as per the limits prescribed in the Act and the Rules.

vii. Administrative overheads shall not exceed the limits prescribed in the Act and the Rules for a financial year.

viii. Any amount spent for subscription to Zero Coupon Zero Principal Instruments, as stated in the CSR Activities & programmes in this policy shall be subject to the limits prescribed under the Act and the Rules made thereunder.

7.2.2. QUALIFICATIONS AND EXCLUSIONS

i. Activities undertaken in pursuance of normal course of business of the Company shall not be considered as CSR activity.

ii. Contributions of any amount directly or indirectly to any political party shall not be considered as CSR activity.

iii. Only those CSR activities, programmes or projects that are undertaken in India shall qualify as CSR activities except activities undertaken for training of Indian sports personnel representing any State or Union Territory at National level or representing India at International level.

iv. Activities, programmes or projects that benefit only the employees of the Company shall not be considered as CSR activity.

v. One-off events such as marathons/ awards/ charitable contributions/ advertisements/ sponsorships of TV programmes etc., shall not be considered as CSR activity.

vi. Expenses incurred for fulfilling the requirements of any other statute under any law in force shall not be counted as CSR expenditure.

vii. Activities on sponsorship basis for marketing purpose shall not be considered as CSR activities.

7.2.3. CSR ACTIVITIES, PRORAMMES AND PROJECTS

The CSR activities, programmes and projects that will be undertaken by the Company shall be those as may be recommended by the CSR Committee and approved by the Board of the Company.

The CSR Committee will approve the undertaking of such activities and programmes/projects as are covered under the following areas as set out in Schedule VII of the Act and any complementing activities:

i. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation] and making available safe drinking water.
ii. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
iii. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
iv. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.
v. Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional art and handicrafts.
vi. Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows.
vii. Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports.

viii. Contribution to the prime minister's national relief fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women.

ix. (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and (b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).

x. Rural development projects

xi. Slum area development.

xii. Disaster management, including relief, rehabilitation and reconstruction activities.

xiii. Subscription to zero coupon zero principal instruments issued by a Not-for-Profit Organization registered with the Social Stock Exchange segment of a recognised Stock Exchange.

xiv. All such other activities and programmes/projects as may be added in Schedule VII of the Act or otherwise allowed by the Ministry of Corporate Affairs from time to time.

In accordance with Ministry of Corporate Affairs Circular dated 18.06.2014, the entries in the said Schedule VII above shall be interpreted liberally so as to capture the essence of the subjects enumerated in the said Schedule.

7.2.4 GUIDING PRINCIPLES FOR SELECTION IMPLEMENTATION, MONITORING & EVALUATION OF CSR ACTIVITIES

a) Selection:

i. The Company and/or HCL Foundation will receive proposals for PAN India implementation based on need assessment (wherever applicable) through well-publicized RFPs (Request for Proposals) for funding projects during the Financial Year. Proposals may also be received from Government Departments / Agencies in larger public interest.

ii. CSR programme/project proposals shall include:
   - Need Assessment, Baseline Survey where required.
   - Enumeration of end goals/outcomes/Impact/theory of change.
   - Specification of start date and end date.
   - Allocation of budget.
   - Clear identification of beneficiaries.
   - Clear identification of milestones for the complete duration of the programme/project.

iii. HCL Foundation's panel of experts shall transparently evaluate proposals received and projects and partners will be prioritized for approval by assessing their potential for sustainability, scale and impact. Opportunities for complementing / supplementing Government initiatives / programmes/projects will be explored. However, funds will not be deposited in Government accounts except where the Act/Rules clearly specify such requirement.

iv. The Company may engage international organisations for designing, monitoring and evaluation of the CSR programmes or projects, as well as for capacity building of its own personnel for CSR.

v. Agreements shall be signed with implementing agencies qualified to undertake CSR activities under The Act / Government Departments / Agencies for each approved project clearly outlining deliverables, timelines, and budget.

b) Implementation, monitoring & evaluation:

i. A progress report on periodic basis of all programmes and projects shall be provided to the Board by the CSR Committee.

ii. HCL Foundation shall report progress of all programmes and projects to the CSR Committee.

iii. A comprehensive monitoring mechanism will be devised by the Company to ensure that the CSR process functions as mandated by the Act and the Rules, ensuring that all programmes/projects are duly implemented within stated timelines and budget. This will be done based on the following:

   a. Installation of an MIS that shall work to ensure a firm check on spends and the actual implementation of activities as planned.
   b. Release of CSR funds only against verified utilizations.

iv. The monitoring system devised by the Company will include:

   a. Regular field visits to programme/project sites by designated staff/teams.
   b. Comprehensive documentation /compilation of field reports, including picture and video-based monitoring. E-monitoring systems will also be in place.
   c. Regular interaction with beneficiary communities to obtain feedback.
   d. Monitoring of timely fund utilization to ensure that programmes/projects as budgeted are being carried out, and
   e. Any other activity that the CSR Committee may deem necessary in the larger interest of its CSR initiatives.

v. Concurrent and final evaluation of CSR programmes and projects shall be undertaken by the Company.

7.2.5 IMPACT ASSESSMENT

The Company shall perform Impact Assessments of its CSR projects as provided in the Act read with the Rules made thereunder, by one or more independent agencies identified through a transparent, accountable process.

7.2.6 DOCUMENTATION

The Company shall undertake comprehensive compilation of programmes and projects in Digital Formats, Audio / Video Recording, Social Media, Printed Material etc.

7.2.7 ACCOUNTING AND AUDIT

Programmatic and Financial Accounting of all programmes and projects shall be undertaken. Accounting and Audit guidelines shall be followed as mandated/approved by the Ministry of Corporate Affairs, Government of India or as may be prescribed by the concerned Competent Authority in Government of India.

7.2.8 DISCLOSURE

Disclosure on CSR shall be in accordance with the Act read with the Rules made thereunder and as applicable from time to time.

7.2.9 REPORTING

The Company shall take up Mandatory Reporting as per the Act read with the Rules made thereunder.

7.2.10 EFECTIVE DATE AND AMENDMENTS

Any Amendment in the Act and/or Rules issued by the Government from time to time shall be deemed to be suitably incorporated from the date these are applicable on the Company.

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