Business Responsibility and Sustainability Reporting (BRSR)

Business Responsibility & Sustainability Report (BRSR) FY26

BRSR Statement of Director

We are pleased to share our Business Responsibility and Sustainability Report ("BRSR") for the fiscal year spanning April 1, 2025, to March 31, 2026 (FY26).

HCLTech has a rich history of innovation and growth. The Company has been involved in various landmark projects, including the establishment of the network for India's first floorless electronic stock exchange for NSE in 1993. Over the years, HCLTech has expanded its technology services and software products to global markets including North America, Europe and APAC.

The Company is committed to supercharging progress by bringing together the best of technology and its people. It has a strong focus on next-gen technologies such as AI, Automation, IoT, Cybersecurity, Cloud, and Digital.

Through HCLFoundation, HCLTech drives a purpose-led CSR agenda focused on sustainable community impact. Its global initiatives span key areas and are strengthened through partnerships, grants, and employee volunteering. These efforts reflect a strong commitment to inclusive growth and long-term positive change worldwide.

HCLTech is recognized for its commitment to people, communities, and the planet.

Sustainability Awards

HCLTech has received numerous awards and recognitions for its sustainability efforts. Some notable awards include:

- **S&P Global Sustainability Yearbook**
  Included for the **4th year in a row**, with **16%** improvement in the score
- **EcoVadis**
  Awarded EcoVadis Gold rating for the **second consecutive year**, ranking in the **96th percentile** globally in FY26.
- **MSCI ESG Ratings**
  Achieved **AA rating** for strong **ethics and human capital practices**
- **Science Based Targets initiative (SBTi)**
  Climate targets **validated for both near-term and long-term goals**
- **Perpetual Capital – Hurun**
  Ranked #2 among top 50 companies featured in India Impact 50 (2026) in recognition of The Company's strong commitment to embedding sustainability in its business strategy and operations.

Governance

HCLTech is committed to maintaining the highest standards of corporate governance. The Company's governance policies are regularly reviewed and include Board Diversity, Code of Business Ethics and Conduct, Corporate Social Responsibility, Fair Disclosure, Whistleblower policy, Anti-Bribery and Anti-Corruption, Environmental Sustainability and Occupational Health and Safety.

ESG & DEI Committee of the board met on four occasions during FY26 to review and evaluate the performance on material aspects against our objectives.

Environmental Achievements

HCLTech has made significant strides in environmental sustainability. Key achievements include:

- Our energy consumption has decreased by 31% in comparison to our baseline year of FY20, with a 56% reduction in non-renewable energy usage.
- Achieved a 55.84% reduction in scope 1 and 2 emissions, four years ahead of the target year FY30, compared to the baseline year FY20.

- Set a new benchmark in water leadership globally by replenishing 51x more water than our own consumption, totaling to 47.57 billion liters replenished in FY26
- Maintained industry leadership in water with the lowest water consumption at 10.68 L/capita/day
- 89.65% of energy used in our data centers comes from renewable energy
- Achieved 49.79% of renewable energy across global operations.
- Impacted 8.4 million lives with 54% female beneficiaries through its CSR arm, HCLFoundation, and helped 16,800 persons with disabilities.
- Planted over 3.5 million saplings, developed water structures, rejuvenated 386 water bodies replenishing 51x the amount of water we consumed.
- Maintained 100% Zero Waste to Landfill Platinum Certification for all campuses in India.

These achievements have been made possible by continued focused execution from teams across the organization and the guidance and sponsorship from HCLTech's leadership. They underscore HCLTech's unwavering commitment to fostering a sustainable future. Through innovative approaches and dedicated efforts, The Company not only mitigates its environmental impact but also enhances the well-being of communities globally. HCLTech's proactive stance on sustainability serves as an inspiring model for others to follow.

I further invite you to explore our Sustainability Report FY26, available on our website, for a deeper perspective on our sustainability journey, key accomplishments, and future ambitions.

Thank you for your continued support to our vision and execution of our ESG strategy and I welcome your feedback on this BRSR.

Simon John England

Chairperson - ESG & DEI Committee

Section A : General Disclosures

I. Details of the listed entity:

S. No.	Particulars	Details
1	Corporate Identity Number (CIN) of the Listed Entity	L74140DL1991PLC046369
2	Name of the Listed Entity	HCL Technologies Limited
3	Year of Incorporation	1991
4	Registered office address	806, Siddharth, 96, Nehru Place, New Delhi - 110019, India
5	Corporate address	Technology Hub, Special Economic Zone, Plot No. 3A, Sector 126, Noida - 201304, U.P., India
6	E-mail	investors@hcltech.com
7	Telephone	+91-120-4306000
8	Website	www.hcltech.com
9	Financial year for which reporting is being done	1st April 2025 to 31st March 2026
10	Name of the Stock Exchange(s) where shares are listed	National Stock Exchange of India Limited ("NSE"); BSE Limited ("BSE")
11	Paid-up Capital	The paid-up equity share capital of HCL Technologies Limited as on March 31, 2026 is Rs. 542,73,30,192/- comprising of 271,36,65,096 equity shares of face value of Rs.2/- each.
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Mr. Vipul Arora Global Head – Sustainability +91-120-4306000 sustainability@hcltech.com
13	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together)	Disclosures made in this report are on a consolidated basis unless otherwise stated
14	Name of assessment or assurance provider	DNV Business Assurance India Private Limited ("DNV")
15	Type of assessment or assurance obtained	Reasonable Assurance for Core Indicators and Limited Assurance on selected other indicators.

II. Products/Services:

16. Details of business activities *(accounting for 90% of the turnover):*

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Information and Communication (Revenue from operation) (GICS Classification – Information Technology – Software and Services)	Computer programming, consultancy, software and related activities. HCLTech provides next-generation digital transformation services to global enterprises by leveraging its full-stack portfolio spanning AI, Digital, Engineering, Cloud and Software.	100%

17. Products/Services sold by the entity *(accounting for 90% of the entity's turnover):*

S. No.	Product/Service	NIC Code	% of total Turnover contributed
1	IT & Business Services ("ITBS") - The ITBS business segment improves consumer and employee experiences by empowering multinational corporations to conduct business transformation in an agile and sustainable way. It makes up the largest component of HCLTech's total revenue mix consisting of 4 segments: Digital Business Services, Digital Foundation Services, Digital Process Operations and EdTech Business Services	Services are broadly mapped to NIC classes 620 and 631	74%
2	Engineering and R&D Services ("ERS") - Engineering services and solutions in all aspects of product development and platform engineering.		17%
3	HCLSoftware - Provisions of modernized software products to global clients for their technology and industry-specific requirements		9%

III. Operations:

18. Number of locations where plants and/or operations/offices of the entity are situated:

Locations	Number of plants	Number of offices	Total
National	Not Applicable	55	55
International	Not Applicable	206	206

Note:

1. *HCLTech does not produce any physical products or owns/operates any manufacturing facilities/plants. Therefore, disclosure regarding number of plants is not applicable to The Company.*

19. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States)	15
International (No. of Countries)	60

b. What is the contribution of exports as a percentage of the total turnover of the entity?

91.54%

Note:

1. *This is for HCL Technologies Limited – Standalone Entity*

c. A brief on types of customers

HCLTech is committed to supercharging progress by delivering technology-led services and products that create long term value for its clients, employees, communities, and the planet. With a strong legacy of innovation and a scaled global operating model, The Company positions itself as a preferred digital and artificial intelligence (AI) partner to Global 2000 companies, Global 2000 equivalent organizations and emerging enterprises in chosen markets, including privately held and government owned enterprises and high growth, digital native companies on a trajectory toward Global 2000 status.

HCLTech's strategy emphasizes building deep, strategic client relationships as a trusted long-term partner, supported by an integrated portfolio of digital, engineering, cloud, and AI-enabled services embedded across its solutions and delivery model. In parallel, HCLSoftware operates with a broader client universe, aligned with the distinct objectives and scale dynamics of a global software business.

The Company primarily serves clients across key industry verticals, including Financial Services, Manufacturing, Life Sciences and Healthcare, Technology and Services, Public Services#, Retail and Consumer Packaged Goods (CPG), and Telecommunications, Media, Publishing and Entertainment, leveraging its global footprint across the North America, Europe, and Asia Pacific.

Public Services include Energy & Utilities, Travel-Transport-Logistics and Government

IV. Employees

20. Details as of March 31, 2026

a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female		Others	
			No (B)	% (B/A)	No (C)	% (C/A)	No (D)	% (D/A)
Employees								
1	Permanent (E)	227,181	159,550	70.23%	67,197	29.58%	434	0.19%
2	Other than Permanent (F)	9,917	7,120	71.80%	2,700	27.23%	97	0.98%
3	Total employees (E+F)	237,098	166,670	70.29%	69,897	29.48%	531	0.22%
Workers								
4	Permanent (G)	-						
5	Other than Permanent (H)							
6	Total workers (G+H)							

Note:

1. *Disclosing gender is voluntary for HCLTech employees. The employees who have not disclosed their gender are categorized as 'others'.*
2. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*

b. Differently abled employees and workers

S. No.	Particulars	Total (A)	Male		Female		Others	
			No (B)	% (B/A)	No (C)	% (C/A)	No (D)	% (D/A)
Employees								
1	Permanent (E)	1,263	966	76.48%	289	22.88%	8	0.63%
2	Other than Permanent (F)	6	4	66.67%	2	33.33%	0	0%
3	**Total employees (E+F)**	**1,269**	**970**	**76.44%**	**291**	**22.93%**	**8**	**0.63%**
Workers								
4	Permanent (G)	-						
5	Other than Permanent (H)							
6	Total workers (G+H)							

Note:

1. *Disclosing gender is voluntary for HCLTech employees. The employees who have not disclosed their gender are categorized as 'others'.*
2. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*

21. Participation / Inclusion / Representation of women

Particulars	Total (A)	No. & Percentage of Females	
		No (B)	% (B/A)
Board of Directors	10	5	50.00%
Key Management Personnel (KMP)	3	0	0.00%

22. Turnover rate for permanent employees and workers

Particulars	FY26				FY25				FY24			
	Male	Female	Others	Total	Male	Female	Others	Total	Male	Female	Others	Total
Permanent Employees	12.61%	12.28%	8.17%	12.51%	13.06%	12.81%	5.66%	12.99%	12.32%	12.72%	7.71%	12.42%
Permanent Workers	–											

Note:

1. *Attrition data provided by HCLTech is voluntary attrition % (LTM-IT Services).*
2. *Disclosing gender is voluntary for HCLTech employees. The employees who have not disclosed their gender are categorized as 'others'.*
3. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*

V. Holding, Subsidiary, and Associate Companies (including joint ventures)

23. (a) Names of holding / subsidiary / associate companies / joint ventures (As on March 31, 2026)

Details of holding, subsidiary and associate companies (including JVs) are provided in the Directors' report, which forms a part of the Annual Report. All entities indicated participate in the preparation of BRSR report for the listed entity.

S. No.	Name of the holding/subsidiary/associate companies/joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Actian Australia Pty. Limited	Subsidiary	100%	Yes
2	Actian Corporation	Subsidiary	100%	Yes
3	Actian Europe Limited	Subsidiary	100%	Yes
4	Actian France	Subsidiary	100%	Yes
5	Actian Germany GmbH	Subsidiary	100%	Yes
6	Actian Technology Private Limited	Subsidiary	100%	Yes
7	Anzospan Investments Pty. Ltd	Subsidiary	70%	Yes
8	ASAP Electronics GmbH, Gaimersheim	Subsidiary	100%	Yes
9	ASAP Engineering GmbH, Friedrichshafen	Subsidiary	100%	Yes
10	ASAP Engineering GmbH, Gaimersheim	Subsidiary	100%	Yes
11	ASAP Engineering GmbH, Leonberg	Subsidiary	100%	Yes
12	ASAP Engineering GmbH, Rüsselsheim	Subsidiary	100%	Yes
13	ASAP Engineering GmbH, Weyhausen	Subsidiary	100%	Yes
14	ASAP Holding GmbH	Subsidiary	100%	Yes
15	ASAP Quality Consulting GmbH, Gaimersheim	Subsidiary	100%	Yes
16	Axon Group Ltd.	Subsidiary	100%	Yes
17	Axon Solutions Limited	Subsidiary	100%	Yes

S. No.	Name of the holding/subsidiary/associate companies/joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
18	Butler America Aerospace LLC	Subsidiary	100%	Yes
19	C3i Europe Eood	Subsidiary	100%	Yes
20	C3i Japan GK	Subsidiary	100%	Yes
21	C3i Services &Technologies (Dalian) Co., Ltd	Subsidiary	100%	Yes
22	C3i Support Services Pvt Ltd.	Subsidiary	100%	Yes
23	CeleritiFintech Services Limited	Associate	49%	Yes
24	Confinale (Deutschland) GmbH	Subsidiary	100%	Yes
25	Dicturus Grundstücksverwaltungsgesellschaft mbH & Co. Vermietungs KG,	Subsidiary	94%	Yes
26	DWS (New Zealand) Ltd	Subsidiary	100%	Yes
27	DWS (NSW) Pty Ltd	Subsidiary	100%	Yes
28	DWS Pty Limited	Subsidiary	100%	Yes
29	FIDUS Personal GmbH	Subsidiary	100%	Yes
30	Filial Espanola De HCL Technologies S.L.	Subsidiary	100%	Yes
31	FINERGIC CONSULTING PTE. LTD.	Subsidiary	100%	Yes
32	FINERGIC Luxembourg S.A.	Subsidiary	100%	Yes
33	FINERGIC SOLUTIONS PTE. LTD.	Subsidiary	100%	Yes
34	Geometric Americas, Inc.	Subsidiary	100%	Yes
35	Geometric Europe GmbH	Subsidiary	100%	Yes
36	H C L Technologies Lanka (Private) Limited	Subsidiary	100%	Yes
37	HCL (Brazil) Tecnologia da Informação Ltda	Subsidiary	100%	Yes
38	HCL (Ireland) Information Systems Ltd.	Subsidiary	100%	Yes
39	HCL (New Zealand) Ltd.	Subsidiary	100%	Yes
40	HCL America Inc.	Subsidiary	100%	Yes
41	HCL America Solutions Inc.	Subsidiary	100%	Yes
42	HCL Arabia LLC	Subsidiary	100%	Yes
43	HCL Argentina S.A.	Subsidiary	100%	Yes
44	HCL ASIA PACIFIC PTE. LTD.	Subsidiary	100%	Yes
45	HCL Australia Services Pty. Ltd.	Subsidiary	100%	Yes

S. No.	Name of the holding/subsidiary/associate companies/joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
46	HCL Axon Solutions (Shanghai) Co. Ltd.	Subsidiary	100%	Yes
47	HCL Bermuda Ltd.	Subsidiary	100%	Yes
48	HCL Canada Inc.	Subsidiary	100%	Yes
49	HCL Comnet Systems and Services Ltd.	Subsidiary	100%	Yes
50	HCL EAS Ltd.	Subsidiary	100%	Yes
51	HCL Great Britain Limited	Subsidiary	100%	Yes
52	HCL Guatemala, Sociedad Anónima	Subsidiary	100%	Yes
53	HCL Hong Kong SAR Ltd.	Subsidiary	100%	Yes
54	HCL Insurance BPO Services Limited	Subsidiary	100%	Yes
55	HCL Investments (UK) Ltd.	Subsidiary	100%	Yes
56	HCL İSTANBUL BİLİŞİM TEKNOLOJİLERİ LİMİTED ŞİRKETİ	Subsidiary	100%	Yes
57	HCL Japan Ltd.	Subsidiary	100%	Yes
58	HCL Latin America Holding LLC	Subsidiary	100%	Yes
59	HCL Lending Solutions, LLC	Subsidiary	100%	Yes
60	HCL Muscat Technology LLC	Subsidiary	100%	Yes
61	HCL Poland sp. z o.o	Subsidiary	100%	Yes
62	HCL Singapore Pte. Ltd.	Subsidiary	100%	Yes
63	HCL Software Products Limited	Subsidiary	100%	Yes
64	HCL Technologies (Beijing) Co. Ltd.	Subsidiary	100%	Yes
65	HCL Technologies (Proprietary) Ltd.	Associate	48%	Yes
66	HCL Technologies (Shanghai) Limited	Subsidiary	100%	Yes
67	HCL Technologies (Taiwan) Limited	Subsidiary	100%	Yes
68	HCL Technologies (Thailand) Limited	Subsidiary	100%	Yes
69	HCL Technologies Angola (SU), LDA.	Subsidiary	100%	Yes
70	HCL Technologies Austria GmbH	Subsidiary	100%	Yes
71	HCL Technologies Azerbaijan LLC	Subsidiary	100%	Yes
72	HCL Technologies B.V.	Subsidiary	100%	Yes
73	HCL TECHNOLOGIES BAHRAIN W.L.L	Subsidiary	100%	Yes
74	HCL Technologies Belgium BV	Subsidiary	100%	Yes
75	HCL Technologies Bulgaria EOOD	Subsidiary	100%	Yes

S. No.	Name of the holding/subsidiary/associate companies/joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
76	HCL Technologies Chile SPA	Subsidiary	100%	Yes
77	HCL Technologies Columbia S.A.S.	Subsidiary	100%	Yes
78	HCL Technologies Corporate Services Limited	Subsidiary	100%	Yes
79	HCL TECHNOLOGIES COSTA RICA SOCIEDAD DE RESPONSABILIDAD LIMITADA	Subsidiary	100%	Yes
80	HCL Technologies Czech Republic S.R.O.	Subsidiary	100%	Yes
81	HCL Technologies Denmark Aps	Subsidiary	100%	Yes
82	HCL Technologies Egypt Ltd.	Subsidiary	100%	Yes
83	HCL Technologies Estonia OU	Subsidiary	100%	Yes
84	HCL Technologies Finland Oy	Subsidiary	100%	Yes
85	HCL Technologies France	Subsidiary	100%	Yes
86	HCL Technologies gbs GmbH	Subsidiary	51%	Yes
87	HCL Technologies Germany GmbH	Subsidiary	100%	Yes
88	HCL Technologies Greece Single Member P.C.	Subsidiary	100%	Yes
89	HCL Technologies Holding UK Limited	Subsidiary	100%	Yes
90	HCL Technologies Holdings GmbH	Subsidiary	100%	Yes
91	HCL Technologies Italy S.P.A.	Subsidiary	100%	Yes
92	HCL Technologies Lithuania UAB	Subsidiary	100%	Yes
93	HCL Technologies Luxembourg SARL	Subsidiary	100%	Yes
94	HCL Technologies Malaysia Sdn Bhd	Subsidiary	100%	Yes
95	HCL Technologies Mexico S.De.R.L.De.C.V	Subsidiary	100%	Yes
96	HCL Technologies Middle East FZ-LLC	Subsidiary	100%	Yes
97	HCL TECHNOLOGIES MIDDLE EAST L.L.C	Subsidiary	100%	Yes
98	HCL Technologies Morocco Ltd.	Subsidiary	100%	Yes
99	HCL Technologies Norway AS	Subsidiary	100%	Yes
100	HCL Technologies Philippines, Inc.	Subsidiary	100%	Yes
101	HCL Technologies Romania s.r.l.	Subsidiary	100%	Yes
102	HCL Technologies S.A.	Subsidiary	100%	Yes
103	HCL Technologies SAC	Subsidiary	100%	Yes

S. No.	Name of the holding/subsidiary/associate companies/joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
104	HCL Technologies Sdn Bhd	Subsidiary	100%	Yes
105	HCL Technologies Slovakia s. r. o.	Subsidiary	100%	Yes
106	HCL Technologies Solution GmbH	Subsidiary	100%	Yes
107	HCL Technologies South Africa (Proprietary) Limited	Associate	36%	Yes
108	HCL Technologies Starschema Kft	Subsidiary	100%	Yes
109	HCL Technologies Sweden AB	Subsidiary	100%	Yes
110	HCL Technologies Switzerland AG	Subsidiary	100%	Yes
111	HCL Technologies Trinidad and Tobago Limited	Subsidiary	100%	Yes
112	HCL Technologies UK Ltd.	Subsidiary	100%	Yes
113	HCL Technologies Vietnam Company Limited	Subsidiary	100%	Yes
114	HCL Training & Staffing Services Private Limited	Subsidiary	100%	Yes
115	HCL Vietnam Company Limited	Subsidiary	100%	Yes
116	HCLTech Public Sector Solutions Inc.	Subsidiary	100%	Yes
117	Phoenix IT & T Consulting Pty Ltd	Subsidiary	100%	Yes
118	Projects Assured Pty Ltd	Subsidiary	100%	Yes
119	PT HCL Technologies Indonesia	Subsidiary	100%	Yes
120	Quest Informatics Private Limited	Subsidiary	100%	Yes
121	Sankalp Semiconductor Inc.	Subsidiary	100%	Yes
122	Sankalp Semiconductor Private Limited	Subsidiary	100%	Yes
123	Starschema Inc.	Subsidiary	100%	Yes
124	Symplicit Pty Ltd	Subsidiary	100%	Yes
125	Versant GmbH	Subsidiary	100%	Yes
126	Wallis Nominees (Computing) Pty. Ltd.	Subsidiary	100%	Yes
127	Wobby BV	Subsidiary	100%	Yes
128	Zeenea SAS	Subsidiary	100%	Yes

Note:

1. *Entities listed at serial numbers 7, 65 and 107 are under the control of the HCLTech group as per Ind AS 110 "Consolidated Financial Statements". Accordingly, these entities are consolidated as subsidiaries with 100% interest.*

VI. CSR Details

24. (i) **Whether CSR is applicable as per section 135 of the Companies Act, 2013:** Yes

(ii) **Turnover (in Rs.):** 55,031 crores *(as per standalone financial statements)*

(iii) **Net worth (in Rs.):** 25,898 crores *(as per standalone financial statements)*

VII. Transparency and Disclosures Compliances

25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct (NGRBC):

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No), If yes, then provide weblink for grievance redressal policy	FY26			FY25		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes CSR Policy	0	0	Nil	0	0	Nil
Investors (other than shareholders)	Yes Investor Relation FAQ	0	0	Nil	0	0	Nil
Shareholders	Yes Investor Relation FAQ	17	0	Nil	8	0	Nil
Employees and workers	Yes Grievance Redressal Protocol Human Rights Policy Whistleblower Policy	26	8	Nil	16	8	Nil
Customers	Yes Whistleblower Policy	0	0	Nil	2	1	Nil
Value Chain Partners	Yes Supplier Code of Conduct	2	1	Nil	2	0	Nil
Other - Includes anonymous complaints	Yes Grievance Redressal Protocol	56	13	Nil	48	25	Nil

26. Overview of the entity's material responsible business conduct issues

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Climate Change, Net Zero and Energy Transition	Risk and Opportunity	HCLTech's global operations across campuses, data centers, and IT infrastructure consume significant energy, a substantial portion of which has historically been sourced from fossil-fuel-based grids, creating exposure to Scope 1 and 2 emissions and transition risks including carbon pricing, tightening regulatory requirements, and energy cost volatility. The accelerating deployment of AI and high-performance computing is expected to increase energy demand further. HCLTech's Climate Risk Assessment, conducted across India, USA, Europe, Sri Lanka, and Australia, has evaluated physical climate risks including extreme heat, flooding, and water stress. The transition to renewable energy and energy-efficient operations presents a meaningful opportunity to reduce long-term costs, strengthen ESG positioning, and expand HCLTech's climate solutions offerings for clients.	HCLTech is committed to a 50% absolute reduction in Scope 1 and 2 emissions by 2030 and net zero by 2040, aligned to the 1.5°C pathway. The Company has achieved a 55.84% reduction in Scope 1 and 2 emissions against the FY20 baseline. Renewable energy has been scaled from 34.38% in FY25 to 49.79% in FY26 through PPAs, Open Access Group Captive models, and on-site solar, targeting 80% by 2030. Energy audits across major campuses, HVAC upgrades, EC fan retrofits, and UPS optimization have delivered measurable savings. Climate risk findings are integrated into business continuity planning.	RISK: (negative financial implications) Physical climate risks to HCLTech's owned and leased facilities are assessed as Low financial risk, given the nature of IT services operations and geographic diversification. Transition risks, including carbon pricing and tightening energy regulations, carry a financial risk, even as HCLTech's proactive renewable energy investments are progressively reducing exposure. OPPORTUNITY: (positive financial implications) Renewable energy procurement and energy efficiency improvements reduce operational costs and enhance positioning with clients and investors. HCLTech enables clients to accelerate their net-zero journey through AI-led energy optimization, cloud transformation, and sustainable infrastructure solutions. By driving measurable emissions reduction, cost efficiency, and regulatory alignment, we unlock opportunities to deepen client partnerships and expand climate-focused service offerings.

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
2	Eco-Efficiency and Responsible Resource Management	Risk and Opportunity	HCLTech's operations generate waste streams including e-waste, battery waste, biomedical waste, and non-hazardous waste. Facility operations across water-stressed geographies, including Bengaluru, Chennai, Hyderabad, Noida, and Pune, consume significant volumes of water for cooling, sanitation, and landscaping. Increasing regulatory requirements on e-waste (India's E-Waste Management Rules), Extended Producer Responsibility frameworks, and water discharge norms create compliance obligations. Inefficient resource management may attract regulatory penalties and reputational damage. Embedding circular economy principles across the asset lifecycle reduces procurement and disposal costs and strengthens HCLTech's environmental stewardship credentials.	HCLTech has achieved Zero Waste to Landfill Platinum Certification across all owned campuses in India in 2025, five years ahead of industry peer targets, diverting over 99% of total waste from landfill through reduction, reuse, recycling, and authorized recovery pathways. CPCB-authorized recyclers and TSDF operators are engaged for regulated waste streams with full traceability documentation. On water, HCLTech recycled approximately 95% of sewage water through on-campus treatment plants for reuse in landscaping and sanitation. Water conservation initiatives including Scale Bio Removal, automated sprinklers, and de-ionization in cooling towers have delivered material water savings. The Company is a signatory to the Water Resilience Coalition. Our CEO & Managing Director champions the CEO Water Mandate as part of this coalition.	RISK: (negative financial implications) Regulatory non-compliance with e-waste or water discharge norms could attract penalties, though HCLTech's established compliance systems, Zero Waste Platinum Certification, and ISO 14001:2015 certification substantially mitigate residual exposure. OPPORTUNITY: (positive financial implications) Circular economy practices are likely to reduce procurement and disposal costs, enhance operational efficiency, and reinforce HCLTech's reputation as an industry leader in environmental stewardship. HCLTech enables clients to advance circular economy and resource efficiency through sustainable asset lifecycle management and water optimization solutions. This supports cost efficiency, regulatory compliance, and strengthens sustainability outcomes, creating opportunities to deepen client engagements.

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
3	People - Talent, Inclusion and Well-being	Risk and Opportunity	As a people-intensive global technology company with 237,098 employees across 56 countries, HCLTech's business performance is fundamentally dependent on the well-being, health, safety, and continuous development of its workforce. Risks include inadequate working conditions, attrition driven by poor work-life balance, insufficient investment in emerging technology skills (particularly AI, cloud, cybersecurity and IoT), and failure to maintain an inclusive and equitable workplace. Gaps in gender diversity in leadership, underrepresentation of persons with disabilities, and inadequate measures against harassment and discrimination carry legal, reputational, and talent risks. A healthy, skilled, and diverse workforce is a direct driver of delivery quality, client satisfaction, and competitive differentiation.	HCLTech has implemented a holistic well-being program covering physical, mental, financial, and social dimensions of health, with employee well-being spend at 2.08% of revenue in FY26. Hybrid and flexible work arrangements are maintained globally. Comprehensive OHS management systems certified to ISO 45001:2018 cover facilities representing 75% of employees. Gender diversity programs including ASCEND and Steppingstones are in place. Continuous learning is enabled through HCLTech Academy and AI-integrated platforms. Zero-tolerance policies on harassment and transparent pay equity practices are in place globally, and structured D&I programs are offered in compliance with local laws.	RISK (negative financial implications): Inadequate working conditions or sustained high attrition may increase recruitment, onboarding, and productivity-loss costs. These factors are material given HCLTech's human-capital-intensive delivery model with 237,098 employees. Gaps in upskilling may risk delivery capability shortfalls affecting client commitments. OPPORTUNITY (positive financial implications): A continuously upskilled workforce and a strong employer brand directly enable revenue growth, delivery quality, and competitive differentiation. High performance on this theme strengthens talent acquisition economics and supports client confidence in HCLTech's delivery capability.

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
4	Responsible Supply Chain and Human Rights	Risk and Opportunity	HCLTech's extended supply chain involves vendors and subcontractors across multiple geographies with varying labor standards and environmental practices. Potential Risks may include non-compliance with labor norms, unsafe working conditions, restrictions on freedom of association, and in severe cases child labor or forced labor in the supply chain. These risks are amplified by increasing local and global due diligence regulations. Proactive sustainable procurement and responsible sourcing strengthen supply chain resilience, reduce disruption risk, and enhance HCLTech's credibility with multinational clients who face their own supply chain due diligence obligations.	HCLTech's robust Supplier Code of Conduct covers labor standards, human rights, health and safety, and environmental requirements, and is enforced across all onboarded vendors. ESG criteria are integrated into the Vendor Onboarding Assessment (VOA) process, and periodic risk-based audits are conducted on high-risk suppliers. Capacity building support, including an ESG learning platform and manual, is extended to key suppliers. Supply chain engagement is aligned with ILO Core Conventions, OECD Guidelines for Multinational Enterprises, and UN Guiding Principles on Business and Human Rights. Grievance mechanisms are accessible to value chain partners.	RISK (negative financial implications): Potential value chain labor violations and human rights non-compliance may expose HCLTech to regulatory penalties under Indian and international law. Reputational damage from supply chain failures may affect client relationships. Supply chain disruptions from poorly governed vendors may potentially add operational and commercial risk. OPPORTUNITY (positive financial implications): A responsible and resilient supply chain reduces disruption risk, enhances HCLTech's ESG performance and strengthens client and investors' confidence.

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
5	Client Data Privacy and Information Security	Risk and Opportunity	HCLTech processes significant volumes of client data across its global operations, making data privacy and information security central to client trust, regulatory compliance, and business continuity. The evolving global regulatory landscape including the GDPR, India's Digital Personal Data Protection Act 2023 (DPDP Act), other regional data protection laws, and sector-specific regulations across multiple jurisdictions continues to raise expectations around data protection and responsible data stewardship. Any data privacy breach involving client personal or sensitive data may result in regulatory penalties, contractual liability, and reputational damage, directly affecting client confidence, retention, and new business growth. HCLTech's positioning as a trusted technology partner is fundamentally dependent on its ability to demonstrate robust, consistent, and transparent data protection practices across all client engagements.	HCLTech has implemented a comprehensive privacy and data governance framework to safeguard client data across the lifecycle of service delivery. This includes enterprise-wide data protection policies, incident response protocols, and mandatory employee awareness programs. Privacy by design principles are embedded into solutions and service delivery. A global Data Protection Officer has been appointed, supported by regional governance structures. HCLTech operates advanced cybersecurity capabilities, including a 24x7 Cyber Defence Centre, regular security testing, and resilience exercises, to proactively identify and mitigate emerging threats. HCLTech is also progressing its Binding Corporate Rules approvals to further strengthen cross-border data protection assurance.	RISK (negative financial implications): A material data privacy or information security incident may result in regulatory fines & penalties, client contract penalties including potential indemnification claims, remediation costs, and reputational damage. Such events may adversely affect revenue continuity, client retention, and brand value. OPPORTUNITY (positive financial implications): On the other hand, continued focus on strong data protection and security strengthens business resilience, builds client trust, and supports long-term competitiveness.

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
6	Responsible AI, Innovation and Digital Inclusion	Risk and Opportunity	HCLTech's digital platforms, AI-enabled solutions, and technology services are deployed at scale across global client environments, making system reliability, responsible design, and inclusive access critical to maintaining client trust and market reputation. As demand for AI-led and sustainability-aligned solutions increases, HCLTech has a significant opportunity to co-develop inclusive, reliable, and high-impact digital and AI solutions, thereby expanding its addressable market and strengthening its social license to operate. At the same time, rapid scaling of AI and digital solutions, now extending to Agentic AI capabilities that enable autonomous and adaptive workflows presents an evolving set of risks spanning ethical misuse, unintended bias, lack of accessibility, IP exposure and changing regulatory requirements (including global AI regulations such as the EU AI Act). The concerns are further amplified by the anticipated trajectory towards greater system autonomy, reduced human oversight and embed Responsible AI principles and inclusive design. Left unmanaged, they may lead to reputational damage, regulatory scrutiny, and loss of client trust, particularly in an environment of heightened stakeholder expectations on transparency, accountability and governance, ultimately intensifying the need for strong AI risk governance across the enterprise.	HCLTech addresses risks related to responsible AI, innovation, and digital inclusion through robust governance frameworks, structured processes, and strong technical safeguards. Its Responsible AI principles—accountability, fairness, security, privacy, and transparency—are embedded in the AI Risk Management Policy and AI Acceptable Usage Policy, aligned with global standards such as the EU AI Act, NIST AI RMF, ISO 42001, and ISO 23894. These policies reinforce a clear commitment to ethical, secure, and responsible AI adoption across the enterprise. The AI Risk Management Policy enables responsible innovation across the AI lifecycle, while the AI Acceptable Usage Policy guides employees, managers, and third parties in meeting regulatory, security, and ethical requirements. Strengthening this governance framework, HCLTech established the Office of Responsible AI and Governance (ORAIG) to support ethical AI deployment and regulatory alignment across internal operations and client engagements. ORAIG translates principles into actionable frameworks, enabling scalable, transparent, and compliant AI systems. Supported by global collaborations, workforce training, innovation labs, resilient delivery infrastructure, accessibility-led design, and digital inclusion initiatives, HCLTech ensures a scalable, reliable, and risk-managed approach to innovation.	RISK (negative financial implications) The rapid expansion of AI-led and digital solutions, including Agentic AI and the shift toward more autonomous systems, exposes HCLTech to interconnected regulatory, reputational, and governance risks. Evolving global regulations such as the EU AI Act, alongside increasing scrutiny from clients, regulators, and investors on AI governance and transparency, heighten exposure to legal, regulatory, and intellectual property liabilities. As AI systems advance, gaps in embedding Responsible AI principles, inclusive design, or effective oversight could lead to regulatory penalties, reputational impact, and erosion of client trust. Rising compliance requirements and demand for specialized talent may also increase operating costs and affect competitiveness. OPPORTUNITY (positive financial implications) Expanding access to high-quality, inclusive digital solutions and sustainability-driven platforms creates growth opportunities as demand for AI-enabled and ESG-aligned services accelerates. Solutions improving efficiency, enabling responsible data center design, and optimizing energy use support this growth. Strong market positioning—supported by Everest Group leadership recognition, S&P Global Sustainability Yearbook inclusion, EcoVadis Gold rating, and MSCI AA rating—further strengthens brand equity with clients and investors.

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
7	Corporate Governance, Ethics and Transparency	Risk and Opportunity	HCLTech's commitment to ethical business conduct, robust corporate governance, anti-corruption practices, and transparent tax governance underpins its long-term sustainability and stakeholder trust. HCLTech operates across multiple tax jurisdictions globally, and any potential tax practices that may be misaligned with applicable laws or OECD standards can expose The Company to regulatory scrutiny, financial penalties, and reputational damage. Strong governance and ethics practices are a foundation for sustainable business performance and a prerequisite for operating in regulated global markets.	HCLTech upholds high governance and ethics standards through its Code of Business Ethics and Conduct (COBEC) and Anti-Bribery and Anti-Corruption Policy, both ISO 37001:2016 certified, with mandatory training for all employees. Accessible, confidential grievance mechanisms and a formal Whistleblower Protection Policy are in place globally. Tax governance is overseen by the Board, with tax-related disclosures made transparently in statutory filings aligned to OECD BEPS standards. Governance practices are aligned with OECD Guidelines for Multinational Enterprises, G20/OECD Principles of Corporate Governance, and applicable national regulations. HCLTech has been recognized as one of Ethisphere's World's Most Ethical Companies for the third consecutive year in 2026.	RISK (negative financial implications): Governance or ethics failures may attract regulatory sanctions, legal liabilities, and a breakdown of stakeholder trust - with direct financial consequences including potential fines, penalties, and loss of business. Non-compliance with evolving global tax frameworks may impact the effective tax rate and attract regulatory scrutiny across multiple jurisdictions. Potential reputational damage from ethics or governance failures may adversely affect HCLTech's positioning in regulated markets. OPPORTUNITY (positive financial implications): A strong ethics and governance culture enhances operational resilience, reduces legal risk, and reinforces HCLTech's positioning as a trusted and transparent corporate citizen. Recognition among World's Most Ethical Company strengthens client acquisition and retention, particularly in regulated sectors and public services.

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
8	Cybersecurity and Operational Resilience	Risk and Opportunity	HCLTech's role as a global technology and IT services provider makes it a target for sophisticated and evolving cyber threats including data breaches, ransomware, phishing, and supply chain cyber attacks. Cybersecurity incidents affecting client systems or HCLTech's own infrastructure may result in significant financial, legal, and reputational consequences. Evolving regulatory frameworks including GDPR, India's DPDP Act, and sector-specific cybersecurity regulations across multiple jurisdictions may impose growing compliance obligations. The opportunity lies in continuously enhancing cybersecurity capabilities that protect clients and reinforce HCLTech's position as a trusted technology partner, a meaningful competitive differentiator in markets where clients are increasingly scrutinizing the security posture of their IT providers.	HCLTech continuously invests in cybersecurity infrastructure, threat monitoring, and employee awareness programs. A formal Cybersecurity Policy and Incident Response Framework are in place. HCLTech's cybersecurity program is built around various industry standard benchmarks and frameworks e.g. NIST CSF, ISO27002, NIST SP800-53 frameworks and uses a threat intelligence driven, defense in depth model. HCLTech has implemented several active and passive security controls to Prevent, Detect & Respond to Cybersecurity threats. Security & Resilience By-Design is implemented. 24x7 Cyber Defence Centre identifies and responds to potential threats. Regular cybersecurity audits, Red, Purple Teaming, Penetration Testing, Breach & Attack simulation exercises, and mandatory employee training programs are conducted. Security posture is validated against industry standard benchmarks e.g. ISO 27001:2022 and the NIST cybersecurity framework. Quarterly updates are provided to the Board. Cyber insurance coverage is maintained. The Company's Crisis and Resilience (C&R) program, certified to ISO 22301, embeds resilience-by-design across all operational dimensions.	RISK (negative financial implications): A major cybersecurity incident may attract regulatory penalties under applicable data protection laws across multiple jurisdictions, client contract penalties including indemnification claims, and incident response and recovery costs, the aggregate scale of which is contingent on nature, jurisdiction, and client exposure of the incident. Potential reputational damage from a material breach may adversely affect client retention and new business acquisition. HCLTech's established control environment, third-party validated security posture (ISO 27001:2022, NIST), and cyber insurance coverage are assessed to substantially reduce the probability and financial impact of a material incident. OPPORTUNITY (positive financial implications): Building industry-leading cybersecurity and operational resilience capabilities directly supports client retention and new business wins, particularly in financial services, healthcare, and public sector verticals where clients demand demonstrable security assurance from technology partners.

Sr. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
9	Community Impact and Inclusive Growth	Risk and Opportunity	Corporate citizenship is integral to HCLTech's long-term sustainability and its relationship with communities where it operates. Meaningful community engagement supports social license to operate, strengthens trust with local stakeholders, and reinforces HCLTech's reputation as a responsible corporate citizen.	HCLTech delivers its CSR agenda through HCLFoundation, focusing on education, health, livelihoods, environment, water, hygiene and sanitation (WASH) and disaster response. In FY26, HCLFoundation programs cumulatively reached over 8.4 million beneficiaries, with 54% women participants and 16,800 persons with disabilities supported. It also harvested over 155 billion litres of water and greened 74,000 acres of land and brought it under community management. Many of these programs undergo third-party impact assessments, for monitoring and evaluation purposes.	RISK (negative financial implications): (if unmanaged): Weak program outcomes or governance gaps may lead to reputational risk and regulatory scrutiny under CSR provisions. OPPORTUNITY (positive financial implications): Strong community outcomes enhance trust and credibility with stakeholders, support performance, and strengthen HCLTech's standing with investors, clients, and government bodies.

Section B : Management and Process Disclosures

This section is aimed at helping businesses demonstrate the structures, policies, and processes put in place towards adopting the NGRBC principles and core elements.

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management process									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
1. b. Has the policy been approved* by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Note

1. **Reviewed by ESG & DEI Committee of the Board*

1. c. Web Link of the Policies, if available	
Principle 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.	Code of Business Ethics and Conduct Anti-Bribery & Anti-Corruption policy Whistleblower Policy HCLTech Group Tax Strategy
Principle 2: Businesses should provide goods and services in a manner that is sustainable and safe	Supplier Code of Conduct Green Procurement Policy Code of Business Ethics and Conduct Environmental Policy
Principle 3: Businesses should respect and promote the well-being of all employees, including those in their value chains	Supplier Code of Conduct Green Procurement Policy Code of Business Ethics and Conduct Occupational Health & Safety Policy Remuneration Policy HCLTech Group Tax Strategy Human Rights Policy
Principle 4: Businesses should respect the interests of and be responsive to all its stakeholders.	Dividend Distribution Policy Policy for determination of materiality of event or information Related Party Policy Fair Disclosure Code Code of Business Ethics and Conduct Whistleblower Policy
Principle 5: Businesses should respect and promote human rights	Code of Business Ethics and Conduct Human Rights Policy

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Principle 6: Businesses should respect and make efforts to protect and restore the environment	Environmental Policy Energy Policy Occupational Health & Safety Policy Green Procurement Policy Supplier Code of Conduct Water Policy								
Principle 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.	Code of Business Ethics and Conduct Anti-Bribery & Anti-Corruption policy								
Principle 8: Businesses should promote inclusive growth and equitable development.	CSR Policy Supplier Code of Conduct								
Principle 9: Businesses should engage with and provide value to their consumers in a responsible manner	Code of Business Ethics and Conduct Anti-Bribery & Anti-Corruption policy Privacy Statement Privacy Trust Center Vendor Privacy and Information Security								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/ No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
4. Name of the national and international codes/certifications/ labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle	**Principle 1:** • ISO 37001:2016 – ABMS • World's Most Ethical Companies® 2026 by Ethisphere **Principle 2:** • ISO 14001:2015 • ISO 50001:2018 • ISO 9001:2015 **Principle 3:** • ISO 37001:2016 – ABMS • ISO 45001:2018 • ISO 14001:2015 • ISO 14064-1:2018 and 14064-3:2019 • ISO 50001:2018 • ISO 9001:2015 • LEED Certification **Principle 4:** • ISO 9001:2015								

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
	Principle 5: • Signatory to UNGC • Founding Member-WEF's Global Parity Alliance on DE&I • Universal Declaration of Human Rights, • ILO Declaration on Fundamental Principles and Rights at Work **Principle 6:** • ISO 45001:2018 • ISO 14001:2015 • ISO 50001:2018 • ISO 9001:2015 • LEED Certification • ISO 14064-1:2018 and 14064-3:2019 • UN SDGs • CDP • Zero Waste Certification in all HCLTech owned campuses in India **Principle 7:** • Signatory to UNGC • ISO 37001:2016 – ABMS **Principle 8:** • Signatory to UNGC **Principle 9:** • ISO 27001:2022 • ISO 27701:2019								
5. Specific commitments, goals, and targets set by the entity with defined timelines, if any.	HCLTech's goals and targets include: • Achieve Net Zero by 2040 • 50% reduction in absolute Scope 1 and 2 emissions by FY30 from the baseline year of FY20 • 80% of electricity usage to be from renewable energy by 2030 • 42% reduction in absolute Scope 3 emission by FY30 from the baseline year of FY20 • Maintain zero waste to landfill at all owned facilities • HCLTech has the aspiration to have 40% women in overall workforce by 2030 and 30% women in senior leadership by 2030*. *This is applicable in all geographies where we have affirmative diversity programs but excludes geographies such affirmative programs are not to be practiced.								

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
6. Performance of the entity against specific commitments, goals, and targets along-with reasons in case the same are not met.	HCLTech has made significant progress toward its ESG targets including **Performance:** • Achieved a 55.84% reduction in scope 1 and 2 emissions, 4 years ahead of the target year FY30, compared to the baseline year FY20 • Achieved a 9.56% reduction in scope 3 emissions compared to baseline year FY20 • Science Based Targets initiative (SBTi) - Climate targets validated for both near-term and long-term goals, making HCLTech one among top 3 peers with this validation • Increase in renewable energy use to 49.79% of total energy use • 31% reduction in total energy consumption reduction in comparison to FY20 • HCLTech owned campuses in India maintained Zero Waste Platinum Certification received in 2025.								
	Awards and Recognition: • Chairperson Roshni Nadar Malhotra recognized as: 1. Business Leader of the Year by the Indo–American Chamber of Commerce (IACC) 2. Featured among: • Forbes World's 100 Most Powerful Women • Fortune Most Powerful Women in Asia • CEO and Managing Director C Vijayakumar recognized as: 1. India's Best CEO (IT Services-Large Cap) by Fortune India 2. CEO of the Year at the People Matters Infini-T Awards India 2025 3. Best CEO (ranked #1 in Sell-Side and #2 Overall) in Extel's 2025 Executive Team rankings • In World's Most Admired Companies 2026 listing by Fortune • In World's Best Employers listing by Forbes for the sixth year in a row • Highest-ranked India-headquartered technology company in TIME World's Best Companies list for the second consecutive year • Highest-ranked India-headquartered company in the Professional Services category in TIME World's Most Sustainable Companies list for the second consecutive year • Among Ethisphere's World's Most Ethical Companies list for three years in a row • In S&P Global Sustainability yearbook for four years in a row • MSCI AA (Leader) ESG Rating for strong ethics and human capital practices for two years in a row • Ranked 6th out of 209 'IT consulting' companies in ESG risk rating by Sustainalytics • EcoVadis Gold rating for the second consecutive year, at 96th percentile • Ranked No. 2 in the Perpetual Capital–Hurun India Impact 50 2026 list for creating Sustainability impact from the business operations								
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)	The Statement is available at the beginning of the BRSR section.								

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policies.	The highest executive authority responsible for the implementation and oversight of the Business Responsibility of the policies is the **CEO and Managing Director – Mr. C. Vijayakumar**. The highest authority responsible for the oversight of the Business Responsibility of the policies is the ESG and Diversity, Equity and Inclusion (ESG & DEI) Committee of the Board.								
9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.	Yes, The Company has an ESG & DEI Committee of the Board. The members of the ESG & DEI Committee are: • **Mr. Simon John England (DIN 08664595)** Independent Director Chairperson of the Committee • **Ms. Roshni Nadar Malhotra (DIN 02346621)** Non-Independent Director Chairperson of HCL Technologies Limited • **Ms. Bhavani Balasubramanian (DIN 09194973)** Independent Director • **Mr. C. Vijayakumar, CEO and Managing Director,** is an invitee to this Committee.								

10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)								
	P1	P2	P3	P4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9
10.1 Performance against above policies and follow-up action	Committee of the Board: ESG & DEI Committee									Quarterly								
10.2 Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	Committee of the Board: ESG & DEI Committee									Quarterly								

		P1	P2	P3	P4	P5	P6	P7	P8	P9

11.	Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide the name of the agency.	Yes
		• Reasonable Assurance of BRSR (core indicators) and Limited Assurance of BRSR (non-core and Sustainability Report: DNV)
		• ISO 37001-2016 certification audit annually by British Standards Institution ("BSI")
		• Human Rights Assessment by Climactio Services Pvt. Ltd.
		  ◦ Standards:
		    ▪ SA8000:2026,
		    ▪ ETI Base Code,
		    ▪ NGRBC Principles 3 & 5,
		    ▪ UNGPs 2011
		• ISO 14001:2015 annual audit by BSI Management Systems
		• ISO 45001:2018 annual audit by BSI Management Systems
		• ISO 22301 annual audit by Bureau Veritas
		• SOC 2 attestation by Grant Thornton
		• Cyber Essential Plus by Sophlee Limited
		• ISO 27001:2022 Information Security Management Systems by Bureau Veritas.
		• ISO 27701:2019 Privacy Information Management System by Bureau Veritas.
		• Impact assessment of CSR projects: Independent third parties
		• All HCLTech campuses LEED "Platinum" certified by USGBC or IGBC
		• Maintained Zero Waste Platinum Certification issued in 2025.
		In addition, our policies undergo regular evaluation. For instance, HCLTech's Business Gift and Entertainment Policy ("BGEP") and Anti-Money Laundering Policy ("AML") were reviewed by DLA Piper to be in line with current industry standards.								

12. If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated:

Not Applicable

Note:

1. All the policies, goals and targets are enterprise-level, applied in accordance with local regulatory requirements.

Section C : Principle Wise Performance Disclosures

Principle – 1 Business should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

Essential Indicators

1. **Percentage coverage by training and awareness programmes on any of the principles during the financial year:**

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	6	• Corporate Governance & Board Effectiveness • Ethics, Integrity and Anti-Corruption • Risk Management and Enterprise Risk Oversight • Statutory and Regulatory Compliance • Business Strategy and Long-term Value Creation • ESG Oversight at the Board Level	100%
Key Managerial Personnel	1	• Gifts, Travel and Entertainment • Competition and Antitrust • Corporate Opportunities • Government Interactions • Reporting	100%
Employees other than BoD and KMPs	5	• Information Security • COBEC • Export Compliance • Dimensions of Data Privacy • Prevention of Workplace Harassment/ E-Secure Module	99.79%
Workers	-		

Note:

1. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*
2. *Inorganic headcount was not considered in the reporting boundary for the above disclosure for "Employees other than BoD and KMPs"*

2. **Details of fines/penalties/punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/judicial institutions in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and as disclosed on the entity's website):**

   Not applicable, as no fines or penalties were imposed that require disclosure under Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

3. **Of the instances disclosed in Question 2 above, details of the Appeal/Revision preferred in cases where monetary or non-monetary action has been appealed.**

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
Not applicable	

4. **Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.**

   Yes, HCLTech's Code of Business Ethics and Conduct ("COBEC") and Anti-Bribery & Anti-corruption policy ("ABAC") can be accessed on The Company's website.

   The policies apply to all individuals working worldwide for all affiliates and subsidiaries of HCLTech at all levels and grades. The policies cover aspects including but not limited to restricting giving and offering of bribes; bribing government officials; facilitation payments; and processes vis-à-vis charitable donations. Foreign corruption Practices Act ("FCPA"), the UK Bribery Act ("UKBA"), and the Indian Prevention of corruption Act are the governing legislations for these policies.

   HCLTech has also obtained ISO 37001:2016 certification. The Company also conducts ABMS Quarterly Compliance Certification ("ABMS QCC") allowing for the disclosure of different tasks that occurred during the previous quarter. Furthermore, The Company also offers a channel, Global Ethics Helpline for reporting a matter related to unethical behavior or violation of our code of conduct, policies, or procedures. The same can also be reported to whistleblower@hcltech.com. The Company is subject to annual internal and external audits carried out by external agencies.

   HCLTech has once again been recognized as one of the World's Most Ethical Companies® 2026 by Ethisphere marking third consecutive year receiving this prestigious honor.

5. **Number of Directors / KMPs / employees / workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption:**

	FY26	FY25
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	-	-

Note:

1. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*

6. **Details of complaints with regard to conflict of interest:**

Particulars	FY26		FY25	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	NA	Nil	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	NA	Nil	NA

7. **Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest.**

Not Applicable.

There were no issues related to fines/penalties/actions taken by regulators/ law enforcement agencies/judicial institutions, on cases of corruption and conflict of Interest at HCLTech.

8. **Number of days of accounts payables (Accounts payable *365) / (Cost of goods/services procured) in the following format:**

Particular	FY26	FY25
Number of days of accounts payables	46.50	44.40

Note:

1. *No. of days of accounts payable are computed excluding provisions*

9. **Open-ness of business**

Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties, in the following format:

Parameter	Metrics		FY26	FY25
Concentration of Purchases	a.	Purchases from trading houses as % of total purchases	Not Applicable	Not Applicable
	b.	Number of trading houses where purchases are made from	Not Applicable	Not Applicable
	c.	Purchases from top 10 trading houses as % of total purchases from trading houses	Not Applicable	Not Applicable
Concentration of Sales	a.	Sales to dealers / distributors as % of total sales	3.81%	4.59%
	b.	Number of dealers / distributors to whom sales are made	1,406	1,612
	c.	Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	30.19%	32.81%
Share of RPTs in	a.	Purchases (Purchases with related parties / Total Purchases)	0.16%	0.16%
	b.	Sales (Sales to related parties / Total Sales)	0.02%	0.03%
	c.	Loans & advances (Loans & advances given to related parties / Total loans & advances)	0.00%	0.00%
	d.	Investments (Investments in related parties / Total Investments made)	0.00%	0.00%

Leadership Indicators

1. Awareness programs conducted for value chain partners on any of the Principles during the financial year:

Total number of awareness programs held	Topics/ principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programs
1,134	• Fire Safety & Rescue Techniques • Incident Reporting & Investigation • Workplace Hazards • Risk Assessment and Work Permit system • Working at height, slips and trips hazards • Importance and use of Personal Protective Equipment • Personal hygiene and grooming • Chemical Safety and MSDS awareness • Chemical usage and dilution • Food Waste and Handling • Importance of Checklists • Roles and responsibilities of Pantry boys • Energy Conservation and efficiency • Environment protection • Confined space & Lone working awareness/Buddy system • Awareness on Waste segregation, 4 steps of cleaning & Sanitization, Drain Maintenance. • Emergency preparedness • Electrical Safety & LOTO Procedure • Confined Space Safety & SCBA Operations • Fire warden-roles and responsibilities. • First Aid, Necessity of first aid and emergency escalation levels. • Workplace Ethics. • Workplace Violence, theft, and Intoxication. • Common Area Cleaning Procedure (Lift, Lobby & Reception, Staircase, Etc.) • POSH training • Anti-bribery • ESG Overview training • ESG Reporting training • ESG Building Blocks training • Modern Slavery training • Sustainable Supply Chain • Climate Change and its impact • Embracing circularity • Openness and transparency in business conduct	100%

2. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/ No) If Yes, provide details of the same.

Yes. The Company receives, from the members of the Board, a list of entities in which they are interested, at the beginning of every financial year and as and when there is any change in such interest. It is ensured that the requisite approvals required under the statute as well as The Company's policies are in place before transacting with such entities. Further, The Company has adopted the Code of Business Ethics and Conduct which requires that the Directors of The Company avoid any activity or association that creates or appears to create a conflict between the personal interests of the Directors and the business interests of The Company.

Principle – 2 Business should provide goods and services in a manner that is sustainable and safe.

Essential Indicators

1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.

Particulars	FY26 (₹ Crores)	FY25 (₹ Crores)	Details of improvements in environmental and social impacts
R&D	100%	100%	Investments in research and development (R&D) are made to enhance the effectiveness of our existing products and services, as well as to create new ones. Upgrading legacy code improves performance efficiency and leads to environmental benefits. Moreover, we focus on enhancing our products to provide better security and privacy for our users. HCLTech is currently in the process of implementing an internal sustainability accounting framework aligned with the EU Taxonomy. Once operationalized, this will enable more precise and structured tracking of R&D and capex investments directed towards improving environmental and social outcomes across our products and processes.
Capex	4.27%	2.5%*	Our capital expenditure primarily focuses on enhancing energy efficiency and accessibility through improved equipment and building infrastructure. HCLTech is currently in the process of implementing an internal sustainability accounting framework aligned with the EU Taxonomy. Once operationalized, this will enable more precise and structured tracking of R&D and capex investments directed towards improving environmental and social outcomes across our products and processes.

Note:

*1. *During the current reporting year, The Company refined its methodology for identifying and classifying sustainability-related capital expenditure to ensure better alignment with internal definitions and regulatory guidance. Accordingly, the prior period disclosure has been restated for comparability.*

2. a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)

Yes. We have adopted a Responsible Supply Chain framework in the form of Green Procurement Policy and Supplier Code of Conduct to strengthen our commitment to responsible sourcing. Suppliers are required to mandatorily accept both the Supplier Code of Conduct and Green Procurement Policy. ESG considerations are integrated from the outset during supplier selection processes, including through Requests for Proposals (RFPs) and e-bidding. Additionally, we employ a risk-based assessment approach when onboarding new vendors, evaluating various aspects of their operations to ensure compliance with our ESG criteria and adherence to our standards for sustainability and ethical practices. HCLTech's Green Procurement policy and Supplier Code of Conduct is aligned with ISO 20400:2017 (Sustainable Procurement) guidelines and has been independently validated by a third-party. Periodic ESG assessments are also conducted internally as well as through a third-party assessor.

2. b. If yes, what percentage of inputs were sourced sustainably?

100% of HCLTech's suppliers are covered under The Company's responsible sourcing framework through mandatory adherence to the Supplier Code of Conduct and Green Procurement Policy, which outline expectations on ethical conduct, labor practices, environmental responsibility, and governance standards. The Supplier Code of Conduct is based on the United Nations Global Compact (UNGC) principles, and acceptance of the Code is a prerequisite for onboarding and continuing engagement with suppliers.

During FY26, HCLTech assessed suppliers on key sustainability parameters aligned with the BRSR Core indicators, including labor practices, human rights, ethics, environmental management, and sustainable procurement practices, through a third-party Sustainable Supply Chain Assessment platform.

These assessments are conducted using a risk based approach and form the basis for supplier engagement, corrective actions, and continuous improvement.

3. **Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.**

While HCLTech does not engage in product manufacturing, The Company manages end-of-life materials responsibly across its operations:

(a) Plastics (including packaging): Segregated at source and diverted for recycling through authorized partners.

(b) E-waste: All e-waste is disposed exclusively through Central Pollution Control Board (CPCB) authorized recyclers with full traceability. Asset life is extended through repurposing, component cannibalization and refurbishment before final disposal. HCLTech follows defined lifecycle guidelines (4–5 years for end-user computing devices and 7–10 years for domain infrastructure)

(c) Hazardous waste: Managed through CPCB-authorized recyclers and TSDF operators in compliance with applicable environmental regulations.

(d) Other waste: Managed through an integrated waste management system. HCLTech has achieved Zero Waste to Landfill Platinum Certification across all owned campuses in India in FY25, and maintained the same in FY26, diverting over 99% of waste from landfill.

4. **Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.**

No. EPR is not applicable as HCLTech does not manufacture products. However, The Company takes a proactive approach to responsible waste management:

- All e-waste is disposed of through CPCB-authorized recyclers with complete traceability, in compliance with E-Waste Management Rules.
- Asset life is extended through repurposing, refurbishment and component-level reuse, minimizing e-waste generation.

HCLTech is certified to ISO 14001:2015 and has achieved Zero Waste to Landfill Platinum Certification across all owned campuses in India in FY25, and maintained the same in FY26 diverting over 99% of waste from landfill.

Leadership Indicators

1. **Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?**

Yes

Sr. No.	NIC Code	Name of Product/Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective/ Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	If yes, provide the web-link.
1	620	myPCM Product Carbon Footprint (HCLTech developed PCF Calculation Tool) – cloud-hosted to calculate product carbon footprint with boundary of cradle to gate which enables rapid hotspot insights with minimal product data.	Nil / Not separately attributable (internal accelerator; not sold as a standalone product/service	Service delivery boundary for the platform's operation, capturing emissions across cloud usage including hardware resources, infrastructure and software code, enabled through integration of Microsoft Azure cloud emission API, and supported by optimization measures (e.g., CPU/ GPU utilization, storage optimization, VM right-sizing, green software engineering practices).	No (conducted as an internal capability build/ enablement initiative)	No	NA

2. **If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products/services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.**

As a services company, our most significant environmental impact from our digital tools and service delivery arises during the use phase, primarily driven by energy consumption associated with cloud infrastructure, hardware resources, and software operations. To mitigate this, we have implemented a range of measures focused on optimizing the environmental footprint of our service delivery. These include CPU/GPU utilization optimization, storage optimization, VM right-sizing, and green software engineering practices such as efficient coding that reduces processing iterations and thereby lowers energy consumption during the use phase. We also continue to increase the share of renewable energy powering our operations, further reducing the carbon intensity of our services. These improvements are part of our ongoing efforts to provide carbon neutral services to our clients.

3. **Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).**

Not material to core service delivery as HCLTech operates in the IT services sector with minimal direct material input. However, The Company promotes circularity through responsible procurement, refurbishment, and reuse of IT equipment, and recycling of e-waste through authorized vendors. Efforts are ongoing to strengthen tracking mechanisms for recycled and reused materials.

4. **Of the products and packaging reclaimed at end of life of products, amount (in metric tons) reused, recycled, and safely disposed, as per the following format:**

Not Applicable to HCLTech as The Company does not engage in any product manufacturing activities.

5. **Reclaimed products and their packaging materials (as percentage of products sold) for each product category.**

Not Applicable to HCLTech as The Company does not engage in any product manufacturing activities.

Principle – 3 Businesses should respect and promote the well-being of all employees, including those in their value chains.

Essential Indicators

1. a. Details of measures for the well-being of employees:

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity Benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
	Permanent employees										
Male	159,550	159,000	99.7%	159,550	100%	-	-	159,550	100%	118,220	74.10%
Female	67,197	67,050	99.8%	67,197	100%	67,197	100%	-	-	51,102	76.05%
Others	434	434	100%	434	100%	-		-		8	1.84%
Total	**227,181**	**226,484**	**99.7%**	**227,181**	**100%**	**67,197**	**29.58%**	**159,550**	**70.23%**	**169,330**	**74.54%**

Note:

1. *Health insurance includes ESIC coverage.*
2. *Employees are entitled to health insurance coverage subject to their opt-in preference*
3. *"Other than Permanent" headcount was not considered in the reporting boundary for the above disclosure.*
4. *Disclosing gender is voluntary for HCLTech employees. The employees who have not disclosed their gender are categorized as 'others'.*
5. *Day Care facilities are available for India employees.*
6. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*

b. Details of measures for the well-being of workers:

Please refer 1.a above for details.

c. **Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format:**

	FY26	FY25
Cost incurred on well-being measures as a % of total revenue of The Company	2.08%	2.21%

Note: *The cost incurred on well-being measures includes the following:*

1. *Cumulative percentage of country-specific expenditures associated with employee insurance, including life, health and other insurance*
2. *Amounts spent for employee health checkups – HCLTech regards its employees as our greatest asset, significantly contributing to a positive and productive work environment. The Company has implemented a distinctive initiative that benefits not only its employees but also their families by offering medical facilities within the campuses in India. This initiative extends beyond providing cashless preventive health check-ups. The medical facilities encompass comprehensive lab tests and procedures at the clinics, which are equipped with state-of-the-art amenities meeting international standards. The services offered include physical consultations, virtual specialist doctor consultations, eye care solutions, and dental services. Over 1000 clinical professionals (doctors, nurses, and technicians) across 51 locations provide best-in-class healthcare services to the employees. Additionally, the campuses are equipped with a 24/7 ambulance service for emergencies. This practice of maintaining on-site healthcare clinics ensures convenient and immediate healthcare access for employees.*

2. **Details of retirement benefits for Current FY and Previous Financial Year.**

Benefits	FY26			FY25		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100%	-	Y	100%	-	Y
Gratuity	100%	-	Y	100%	-	Y
ESI	6.46%	-	Y	7.78%	-	Y
National Pension Scheme (NPS)	2.98%	-	Y	1.33%	-	Y
Superannuation	0.86%	-	Y	0.83%	-	Y

Note:

1. *India employee headcount has been considered for the details of retirement benefits.*
2. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*

3. **Accessibility of workplaces**

Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

People with disabilities (PwD) are integral to HCLTech's workforce, and the firm is always working towards providing them with an inclusive and accessible workplace through the four principles of Employ, Enable, Engage, and Empower (4Es). HCLTech has taken several steps to ensure accessibility for all employees with disabilities by developing well-equipped and disability-friendly infrastructure such as ramps, voice-enabled lifts, PwD washrooms, reserved parking spaces, and emergency warning systems with audio and visual alarms. The organization has also conducted third-party inspections to ensure that its facilities are accessible to employees with disabilities. Furthermore, The Company's websites and internal portals comply with the Web Content Accessibility Guidelines (WCAG2.2), and The Company regularly updates its portals to make them more accessible.

4. **Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web-link to the policy.**

Yes. Our Human Rights policy includes our commitment to being an equal opportunity employer. The policy can be accessed here (Human Rights Policy - https://www.hcltech.com/corporate/human-rights-policy). Moreover, COBEC encompasses all areas on ethics, including a clause on equal opportunity.

5. **Return to work and Retention rates of permanent employees and workers that took parental leave.**

	Permanent Employees		Permanent Workers	
	Return to work rate in %	Retention rate in %	Return to work rate in %	Retention rate in %
Male	99.97%	81.84%	-	
Female	99.88%	81.64%		
Total	**99.94%**	**81.77%**		

Note:

1. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*

6. **Is there a mechanism available to receive and redress grievances for the following categories of employees and workers? If yes, give details of the mechanism in brief.**

Particulars	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Yes. HCLTech has a multi-tiered grievance handling mechanism applicable to all permanent and non-permanent employees including, dedicated channels for addressing harassment, whistle-blower complaints, security incidents, discrimination, general grievances, etc. Employees can raise concerns by submitting their grievance to the Global Ethics Helpline available in the intranet.
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	

Note:

1. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*

7. **Membership of employees and workers in association(s) or Unions recognized by the listed entity:**

Category	FY26			FY25		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees	**227,181**	**13,813**	**6.08%**	**223,420**	**11,673**	**5.22%**
Male	159,550	9,793	6.14%	158,943	8,422	5.30%
Female	67,197	3,951	5.88%	64,364	3,251	5.05%
Others	434	69	15.90%	113	-	-
Total Permanent Workers	-					
Male						
Female						

Note:

1. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*
2. *Disclosing gender is voluntary for HCLTech employees. The employees who have not disclosed their gender are categorized as others.*
3. *There are 17 countries in Europe, 2 in LATAM and 3 in APME where we have recognized Workers Councils or Unions.*
4. *Other than Permanent headcount was not considered in the reporting boundary for the above disclosure.*

8. **Details of training given to employees and workers:**

Category	FY26					FY25				
	Total (A)	On Health and Safety Measures		On Skill Upgradation		Total (D)	On Health and Safety Measures		On Skill Upgradation	
		No. (B)	% (B / A)	No. (C)	% (C / A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	159,550	126,291	79.15%	156,396	98.02%	158,943	30,416	19.14%	154,963	97.50%
Female	67,197	53,251	79.25%	65,499	97.47%	64,364	12,320	19.14%	62,289	96.78%
Others	434	360	82.90%	246	56.68%	113	43	38.05%	64	56.64%
Total	**227,181**	**179,902**	**79.19%**	**222,141**	**97.78%**	**223,420**	**42,779**	**19.15%**	**217,316**	**97.27%**
Workers										
Male	-									
Female										
Total										

Note:

1. *Considered training for FTE employees active as on 31st March 2025 and 31st March 2026 respectively.*
2. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*
3. *Disclosing gender is voluntary for HCLTech employees. The employees who have not disclosed their gender are categorized as 'others'.*
4. *"Other than Permanent" headcount was not considered in the reporting boundary for the above disclosure*

9. **Details of performance and career development reviews of employees and workers:**

Category	FY26			FY25		
	Total (A)	No. (B)	% (B / A)	Total (C)	No. (D)	% (D / C)
Employees						
Male	149,813	149,813	100%	152,829	152,829	100%
Female	61,000	61,000	100%	61,807	61,807	100%
Others	267	267	100%	62	62	100%
Total	**211,080**	**211,080**	**100%**	**214,698**	**214,698**	**100%**
Workers						
Male	-					
Female						
Total						

Note:

1. *Eligible employees are considered in Total Employees.*
2. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*
3. *Disclosing gender is voluntary for HCLTech employees. The employees who have not disclosed their gender are categorized as 'others'.*

10. **Health and safety management system:**

a. **Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, the coverage of such system?**

Yes, while 100% of HCLTech Employees are covered under OH&S Policies and procedures, facilities covering 75% of HCLTech employees are certified against ISO 45001:2018. ISO 45001:2018 is a global standard for Occupational Health and Safety Management Systems (OHMS). It improves workplace safety, reduces risks, and supports employee well-being by helping organizations identify hazards, comply with safety regulations, and enhances the work environment.

b. **What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?**

HCLTech has established, implemented, and maintained a formal process for hazard identification, risk assessment and control to effectively manage workplace and safety hazards across our facilities. HCLTech uses the failure mode effect analysis ("FMEA") to identify work-related hazards and assess risks on a routine and non-routine basis.

After risks are identified, the following steps are taken:

- Risk Evaluation: The identified risks are assessed using the Risk Priority Number (RPN), which considers the Severity, Occurrence, and Detection of each failure mode.
- Action Plan Development: High-priority risks are addressed by creating mitigation strategies, such as design changes, process improvements, or additional controls.
- Implementation of Actions: The corrective measures are applied to reduce the likelihood of failure, minimize impact, or improve detection methods.
- Re-evaluation: The updated process or design is reviewed, and a new RPN is calculated to confirm the effectiveness of the actions taken. The above steps ensure a continuous cycle of improvement to minimize risks and enhance system reliability.

c. **Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Y/N)**

Yes, we have established processes for employees to report work-related hazards and remove themselves from risky situations. Key steps involved are as follows:

- Hazard Identification: Employees are encouraged to identify and recognize potential hazards in the workplace. This is done through regular inspections, observations, and feedback.
- Reporting Channels: Employees can report hazards through various channels such as direct communication with supervisors, dedicated safety committees, or anonymous reporting systems.
- Documentation: Proper documentation of the hazard is crucial. This includes detailing the nature of the hazard, its location, and any immediate risks it poses.
- Immediate Action: Employees have the right to remove themselves from dangerous situations if they believe there is an imminent risk to their health or safety.
- Follow-Up: After a hazard is reported, there is a follow-up process to ensure that the issue is resolved and that the workplace is safe.
- Training and Education: Regular training sessions are conducted to educate employees on how to identify, report, and handle workplace hazards effectively.

d. **Do the employees/worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)**

Yes.

HCLTech extends its focus beyond occupational safety by enabling access to **on-campus, non-occupational healthcare services** for employees and their families in India. These services include diagnostics and laboratory support, consultations (physical and virtual) with specialists, as well as eye and dental care.

Designed to international standards, the on-campus clinics provide accessible, high-quality, and comprehensive care, supporting the overall physical and mental well-being of employees and their families. Over 1000 clinical professionals (doctors, nurses, and technicians) across 51 locations provide best-in-class healthcare services to the employees.

11. **Details of safety-related incidents, in the following format:**

Safety Incident/Number	Category	FY26	FY25
Lost Time Injury Frequency Rate (LTIFR) (per one million person hours worked)	Employees	0.00659	0.0088843
	Workers	-	
Total recordable work-related injuries	Employees	34	29
	Workers	-	

Safety Incident/Number	Category	FY26	FY25
No. of fatalities	Employees	0	0
	Workers	-	
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	-	

Note:

1. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*

12. Describe the measures taken by the entity to ensure a safe and healthy workplace.

HCLTech is committed to ensuring full compliance with all applicable Occupational Health and Safety (OHS) laws and regulations. The Company supports employees and partners in meeting both statutory and internal safety obligations through a structured, proactive, and continually improving OHS management framework.

HCLTech's occupational health and safety approach is underpinned by the following practices:

- **Training and Awareness:** Occupational Health & Safety (OHS) training and awareness programs are an integral part of our routine processes. In addition, targeted drives are conducted periodically to further reinforce safe work practices and enhance employee preparedness for emergencies.
- **Inspections, Audits, and Risk Assessments:** Periodic safety inspections, internal audits, and risk assessments are carried out to ensure adherence to regulatory requirements and internal safety standards.
- **Personal Protective Equipment (PPE):** Appropriate PPE is provided to employees and vendor personnel to mitigate identified workplace hazards.
- **Incident and Risk Reporting:** Employees are actively encouraged to report workplace hazards, near misses, and health concerns through structured reporting mechanisms.
- **Safety Committees:** Active safety committees operate across locations and meet at regular intervals to review safety risks, incidents, and corrective or preventive actions.
- **Incident Management System:** A formal incident reporting and management system ensures that all work-related incidents are reported, investigated, and resolved with effective corrective and preventive measures.
- **Qualified Safety Personnel and Resources:** Qualified safety professionals are deployed, supported by adequate resources to effectively implement and sustain safety programs across operations.
- **Continuous Improvement (Kaizen):** Continuous improvement initiatives are driven through Kaizen practices focused on strengthening safety principles and operational controls.
- **Regular Audits and Inspections:** Internal and external audits and routine inspections are conducted to monitor safety performance and ensure ongoing compliance.
- HCLTech operates an Occupational Health and Safety Management System aligned with ISO 45001:2018.
- **ISO 45001 Certification Coverage:** 26 facilities across India and global locations are ISO 45001:2018 certified, covering approximately 75% of existing sites. Certification audits for new sites are currently in progress and will further expand coverage.
- **Awards and Recognition:** The Bengaluru Jigani Campus received a Distinction Award at the British Safety Council International Safety Awards. Five campuses - Noida, Chennai, Vijayawada, Lucknow, and Madurai' received Merit Awards, reflecting strong safety performance and a mature safety management system.
- **Employee Health and Well-being Initiatives:** Beyond workplace safety compliance, HCLTech places strong emphasis on employee health and well-being. The Company provides on-campus managed healthcare services to employees and their families in India. The services Include:
  - Diagnostic and laboratory services
  - Physical and virtual consultations with specialist doctors
  - Eye care solutions
  - Dental care services

HCLTech ensures the clinics are of international standards and are designed to deliver accessible, high quality, and comprehensive healthcare services, supporting the physical and mental well-being of employees and their families.

13. **Number of complaints on the following made by employees and workers**

Type	FY26			FY25		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	4	0	-	10	0	-
Health & Safety	4,773	0	-	4,027	0	-

Note:

1. The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.

2. An online incident management tool is used to formally raise, track, and close complaints, allowing for efficient digital management of employee complaints. Efforts are made to increase awareness and encourage employees to submit complaints.

14. **Assessments for the year:**

Type	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	100%
Working Conditions	100%

15. **Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.**

HCLTech conducts periodic and need-based risk assessments for Occupational Health and Safety (OHS) using methodologies such as Failure Mode and Effects Analysis (FMEA) to identify potential hazards and assess associated risks. Based on these assessments and any safety-related incidents, corrective and preventive actions are implemented to address identified gaps, strengthen safety controls, and prevent recurrence. These actions are monitored through defined governance mechanisms to ensure effective implementation and continuous improvement in workplace health and safety practices.

S. No.	Focus Area / Improvement Opportunity	Corrective Actions Implemented
1	Strengthening scalable and inclusive Quality, Safety and Sustainability engagement	Corrective actions were implemented to strengthen safety awareness and behavioral compliance across the workforce through structured engagement and communication interventions. **Impact / Outcome:** Key measures included targeted road safety pledges with participation from 262 employees across regions, deployment of QR-based safety quizzes and surveys for continuous awareness reinforcement, and rollout of QR-based multilingual safety policies (English, Hindi, Kannada, Tamil, Telugu, etc.) to improve accessibility for frontline teams. Static communication was replaced with digital safety displays across sites to enhance visibility and consistency of safety messaging, supporting improved adherence to safety protocols.
2	Strengthening proactive and externally validated HSE performance	Occupational Health and Safety performance was strengthened through **external validation and proactive interventions**, including: • Recognition through the **RoSPA Gold Award**, demonstrating excellence in OHS practices. • Alignment with **SDG 3 (Good Health and Well-being)** and **SDG 8 (Decent Work and Safety)** through a strengthened workplace safety culture. • Reduction of operational risk and enhancement of organizational resilience through preventive safety initiatives.

S. No.	Focus Area / Improvement Opportunity	Corrective Actions Implemented
3	Enhancing global recognition of site level HSE practices	Occupational Health and Safety management systems were subjected to **independent external assessments** by nationally and internationally recognized institutions. During FY26, **Chennai** campus received the following recognition for effective OHS implementation and continual improvement: • **International Safety Award** – British Safety Council • **Golden Peacock Award** – Institute of Directors These recognitions validated the effectiveness of on-ground QHSEE efforts and maturity of OHS governance. **Impact / Outcome:** Enhanced transparency, improved stakeholder confidence, and demonstrated robust OHS governance.
4	Increasing leadership visibility and engagement in safety culture	Senior leadership actively demonstrated commitment to workplace safety by sponsoring and participating in **National Safety Week** initiatives. The week commenced with the flag off by **Mr. Ramachandran Sundararajan, Chief People Officer**, setting clear expectations on safety accountability. Supporting initiatives included: • Circulation of Home and Office Safety Guidelines to Chennai based employees. • Safety photo booth and safety selfie initiatives with recognition for awareness and correct usage of safety equipment. • Safety stalls showcasing emergency response, fire and safety, electrical, healthcare, transport, security, housekeeping, and F&B practices. • Live quizzes on ergonomics and workplace safety with on-spot recognition. • School-level fire and safety training with drawing competitions. • National Electrical Safety Day awareness quiz with 200+ participants. **Impact / Outcome:** Improved safety awareness, stronger employee participation, and reinforced ownership of safety across the organization.
5	Strengthening contractor safety governance during outdoor events	**Standardized safety governance framework** for vendor managed outdoor events was established in line with applicable legal and statutory requirements. Vendors were engaged, and guidelines aligned with local regulations were rolled out across Chennai facilities from mid-FY26 onwards. **Impact / Outcome:** Reduced safety deviations, improved contractor compliance, and strengthened value chain safety governance.
6	Expanding safety coverage in client laboratory areas	QHSEE inspection scope was expanded to include **client laboratory areas** through cross-functional safety walkthroughs. A dedicated team comprising Fire and Safety, QHSEE, and Administration conducted inspections of **23 client labs**, identified **123 safety observations**, and ensured tracking and closure through respective lab SPOCs. **Impact / Outcome:** Improved risk identification in laboratory environments and stronger compliance monitoring and closure discipline.
7	Standardizing safety communication for vendor workforce	**Standardized toolbox talk documentation, and attendance mechanism** was implemented to ensure consistent safety communication, traceability, and accountability for vendor personnel operating on campus. **Impact / Outcome:** Improved safety awareness among vendor personnel and enhanced audit readiness.
8	Enhancing effectiveness of **Root Cause Analysis** (RCA) and **Corrective Action and Preventive Action** (CAPA) practices	Corrective actions included strengthening Root Cause Analysis (RCA) and Corrective and Preventive Action (CAPA) capabilities to ensure continuity of safety controls and effective incident response during workforce and vendor transitions. **Impact / Outcome:** Focused training sessions were conducted for 26 participants (17 employees and 9 vendor partners) to improve investigation quality, identify underlying safety risks, and enhance corrective action effectiveness. These interventions strengthened internal capability, ensured consistent implementation of safety procedures, and supported sustained compliance and organizational learning.

Leadership Indicators

1. **Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).**

   Yes

   All employees are covered under HCLTech provided term life insurance. The cover provides extensive group life insurance for employees, offering support to their families in case of death from natural causes or accidents.

2. **Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.**

   HCLTech has established controls to ensure that statutory obligations are being complied with by its value-chain partners. As part of the vendor onboarding assessment process, regulatory and statutory compliance checks are carried out to identify potential non-compliance, including adherence to applicable labor laws and statutory dues requirements.

   In addition, HCLTech conducts periodic, risk-based assessments of vendors, which include a review of compliance with applicable statutory obligations such as deduction and deposit of statutory dues, as relevant to the nature of services provided. These measures form part of HCLTech's broader vendor governance and risk-management framework.

3. **Provide the number of employees / workers having suffered high consequence work-related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:**

Category	Total no. of affected employees/ workers		No. of employees/workers that are	
	FY26	FY25	FY26	FY25
Employees	0	0	0	0
Workers	-		-	

Note:

1. The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.

4. **Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/ No)**

   Yes

5. **Details on assessment of value chain partners**

Type	% of Value Chain partners (by value of business done with such partners) that were assessed
Health and safety practices	100% of the major value chain partners engaged in facilities management are covered.
Working Conditions	100% of the major value chain partners engaged in facilities management are covered.

6. **Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.**

   The corrective actions taken to address significant risks arising from assessment are:

   - RCA & CAPA Capability Building: Focused Root Cause Analysis (RCA) and Corrective and Preventive Action (CAPA) capability-building initiatives were implemented to strengthen incident investigation quality, improve corrective action effectiveness, and reinforce continual improvement practices across operations.
   - Vendor Gate Entry and Permit-to-Work (PTW) Process Optimization: A comprehensive assessment of vendor gate entry and Permit-to-Work (PTW) processes was conducted across the Chennai campus. Structured feedback was collected from active vendors to identify improvement opportunities.
   - Based on the findings: Manpower deployment for PTW issuance was optimized; PTW issuance was relocated to a specific entrance gate to improve accessibility and turnaround time.

   Impact / Outcome

   - Improved vendor experience and ease of access
   - Reduced permit processing time
   - Enhanced operational efficiency while maintaining safety and compliance controls

Principle – 4 Businesses should respect the interests of and be responsive to all its stakeholders.

Essential Indicators

1. Describe the processes for identifying key stakeholder groups of the entity.

HCLTech follows a structured and inclusive process for identifying key stakeholder groups. The Company has undertaken a comprehensive mapping exercise to identify all relevant stakeholders:

- **Internal stakeholders** such as employees
- **External stakeholders** including clients, suppliers, investors, regulators, NGOs, and local communities
- **Indirect stakeholders** such as future generations and natural ecosystems

The stakeholder identification and engagement approach are built on three core dimensions:

- **Influence** – their ability to shape or be influenced by The Company's business decisions
- **Impact** – the extent to which they are affected by, or can affect, The Company's operations
- **Expertise** – their technical knowledge or representative capacity relevant to ESG issues

Engagements are designed and undertaken based on the materiality and need for consultation. These include both targeted methods (such as interviews and workshops) and broader periodic consultations, as appropriate and the frequency of engagement is predicated or scheduled as per the mutual needs of the stakeholders. Insights and outcomes from these engagements are disseminated across relevant teams within the organization to ensure timely feedback and resolution for stakeholders.

This robust engagement mechanism has enabled HCLTech to align its ESG focus with its strategic framework – **Act, Pact, and Impact**. For The Company, stakeholder engagement is not a one-time activity, but a continuous process that supports the understanding and fulfilment of stakeholder expectations. Details are given in the table below.

2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Investors / Shareholders	No	1. Online surveys 2. Focus group discussions 3. One-on-one interviews 4. Non-deal roadshows 5. Investor events (one-on-one and in groups) 6. Reverse roadshows 7. Geo-based management-level meetings post quarterly results 8. Webinars (one-on-one and in groups) 9. Newspaper advertisements on various shareholders related information	Quarterly On going	**Purpose:** 1. To maximize shareholder value 2. Attract investment, and provide transparent information **Scope:** 1. Regular financial reporting 2. Investor conferences 3. Analyst interactions 4. Timely updates on business performance, strategy, and corporate governance **Aspects discussed:** Emerging business risks and opportunities related to sustainability/ESG issues affecting reputation and business performance, GenAI strategy, capital allocation, cash conversion, return ratios, revenue and margin growth trajectory, supply-side pressures like attrition rate and hiring rate, and sustainability of demand.

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees	No	1. Online Modes of Communication: a. Emailers b. Carousel banners on intranet c. Newsletters d. Town halls 2. Focus Group Discussions 3. Wellness sessions and Family sessions 4. Surveys: Pulse surveys 5. Employee Passion clubs, Festivals and other celebrations 6. Employee Resource Groups like Women connect, MERG, WAND ERG, Pride 7. Employee connect portal 360-feedback 8. Client and HCLTech leader sessions 9. Digital collaboration platforms 10. Community volunteering initiatives with HCLFoundation	1. Online Modes of Communication: Emailers, Carousel banners on intranet, Newsletters, Town halls (monthly) 2. Focus Group Discussions (Monthly) 3. Wellness sessions. Family sessions (Quarterly) 4. Surveys: Pulse surveys (As and when required) 5. Employee Passion clubs, Festivals and other celebrations (Monthly) 6. Employee Resource Groups like Women connect, MERG, WAND ERG, Pride (Monthly) 7. Employee connect portal 360-feedback (Annually) 8. Client and HCLTech leader sessions (Monthly) 9. Digital collaboration platforms (Daily/ Continuous) 10. Community volunteering initiatives with HCLFoundation (Quarterly)	**Purpose:** To nurture a talented workforce, enhance employee satisfaction and foster an ethical and positive work environment. **Scope:** • Skill development programs, employee engagement activities, recognition and rewards, health and wellness initiatives, career growth opportunities and open communication channels • Feedback and grievance redressal • Employee engagement (fun at work/motivation/ happiness/ passion/well-being) • Engagement for self-performance improvement and team productivity improvement • D&I • Career support programs • Employee assistance program • Employee feedback on policies • Training programs and learning nuggets – functional and cultural (e.g., Inclusion lab) • Maternity/paternity support • Awareness on sustainability topics **Aspects discussed:** Work environment, opportunities for growth, well-being, mentorship programs, and accessing idea-sharing platforms.

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Clients	No	1. Client experiences Surveys at Project Level (PCSAT) 2. Client experiences Surveys at relationship level (ACSAT) 3. Quarterly Business reviews (QBR) 4. Monthly Service Reviews (MSR) 5. Customer Advisory Board (CAB) 6. HCLTech Global Labs and Innovation Centre Network	1. PCSAT - Half yearly 2. ACSAT - Annually 3. QBR - Quarterly 4. MSR - Monthly 5. CAB – Annually 6. HCLTech Global Labs and Innovation Centre Network (On going)	**Purpose:** To deliver exceptional client experiences, build long-term relationships and meet client expectations. **Scope:** • Quality products and services, personalized solutions, prompt client support, feedback mechanisms, client satisfaction surveys and continuous improvement based on client insights • Resolution of any delivery challenges • Feedback on technology and services being implemented • Discovery of adjacent net new opportunities • Grow footprint and upsell • Account-based marketing (ABM) plans • Quarterly Business Reviews (QBR) process **Aspects discussed:** • Contract compliance • Resource management • Payment queries • Delivery challenges or delays

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Communities in which we operate	Yes	1. Survey 2. Focus Group Discussions 3. Capacity Building 4. Regular Interactions and Discussions	On going	**Purpose:** To actively support local development in the identified slums/ intervention sites, enhance social well-being and promote sustainable practices within communities through CSR Initiatives. **Scope:** Community development initiatives, early childhood care and development, education and skill-building programs, healthcare support, water sanitation and hygiene (WASH), Sports for development initiatives, volunteering activities as well as disaster risk reduction and response efforts. Assessment undertaken for Corporate Social Responsibility (CSR) projects and grievance redressal. **Aspects discussed:** Education, water, sanitation and hygiene (WASH), malnutrition, environmental sustainability, skill development and employability

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Vendors and Suppliers	No	1. Supplier escalation mailbox system 2. Online surveys 3. Dedicated vendor helpdesk	Quarterly (depending on engagement): 1. Internal surveys for supplier performance assessment - Quarterly 2. Onboarding Assessment during onboarding the new vendor 3. Monitoring of Supplier escalation mailbox and Vendor Helpdesk as and when raised by suppliers	**Purpose:** To establish mutually beneficial relationships, ensure supply chain efficiency and drive business growth. **Scope:** • Supplier diversity programs, fair and transparent procurement processes, collaboration on innovation, timely payments and building long-term partnerships based on trust and shared value • Query resolution and grievance redressal • Supplier performance assessment • Vendor Onboarding Assessment • Risk assessment for high-risk vendors • Addressing non-compliance issues • Breach of contract **Aspects discussed:** Inquiries pertaining to sales, point of contact, and payment-related queries.
Industry Associations (FICCI, CII, NASSCOM, WEF etc.)	No	1. Conferences 2. Convergence meetings 3. Focus group discussions 4. One-on-one interviews	Bi-annually and dependent on the requirements	**Purpose:** To collaborate with industry peers, discuss industry trends and contribute to the growth and development of the sector. **Scope:** Policy advocacy, Thought Leadership and discussion of collective initiatives to address industry challenges and drive innovation. **Aspects discussed:** Technology development, regulatory landscape, ESG Trends and emerging best practices

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Academia	No	Based on requirements	Monthly, quarterly	**Purpose:** Bridging the gap between industry requirements and academic education, foster research and innovation and attract top talent **Scope:** • Collaborative research projects, industry academia partnerships, guest lectures, internships, campus recruitment and skill development program • Strengthen leadership and governance of academic engagement with business schools • Developing future leaders for HCLTech and clients with specific leadership programs • Research and development **Aspects discussed:** Future skill trends, new skill development, Industry ready coaching

Leadership Indicators

1. **Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.**

To strengthen its ESG governance, HCLTech has established a robust framework that actively involves both the Board and stakeholders in identifying and addressing ESG-related risks and opportunities. This collaborative approach ensures that The Company's sustainability strategy remains closely aligned with stakeholder expectations and keeps pace with evolving global standards.

At HCLTech, ESG governance is built on several key pillars:

- Developing clear sustainability strategies that support The Company's overall objectives
- Setting measurable ESG targets to monitor progress and drive continuous improvement
- Maintaining open and transparent communication with stakeholders to foster accountability and growth

Executive Directors and Senior Management play a hands-on role in engaging with stakeholders including investors, employees, clients, and suppliers to better understand their needs, expectations, and concerns. Insights and feedback from these interactions are systematically relayed to the Board through well-defined processes.

When stakeholders raise important issues, these are escalated to the appropriate forums for careful consideration and action. HCLTech also has a clear internal mechanism for addressing concerns, suggestions, and grievances, with matters referred to relevant Board committees based on their significance.

To ensure oversight, HCLTech has set up a dedicated ESG & DEI Committee of the Board that meets quarterly. This committee:

- Reviews and assesses ESG risks and opportunities that could impact business performance
- Approves both short-term and long-term ESG strategies
- Ensures these strategies are seamlessly integrated into The Company's overall business plans

The Corporate Sustainability team, led by the Global Head of Sustainability, closely tracks key ESG metrics and provides regular updates to both the ESG & DEI Committee and the CEO and Managing Director. This process ensures transparency and keeps leadership accountable for delivering on The Company's ESG commitments.

2. **Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into the policies and activities of the entity.**

Yes. HCLTech has engaged with stakeholders to identify and prioritize its material topics and will continue to monitor their progress as part of its ongoing sustainability governance and reporting processes. Engaging with stakeholders is central to how The Company identifies environmental, social and governance topics. Through these interactions, we gather valuable feedback, insights, and data that help us focus on what matters most. This process plays a key role in shaping and refining our ESG strategy.

At HCLTech, we stay closely connected with our internal and external stakeholders to understand what truly matters to them and to our business. Through open conversations and interviews, we carry out a double materiality analysis - looking at the risks, opportunities, and impacts from both sides. This helps us focus on the issues that are most relevant and meaningful.

3. **Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalized stakeholder groups.**

HCLFoundation, implementing the CSR agenda of HCLTech, is dedicated to uplifting vulnerable and marginalized communities. Its programs are intentionally designed to reach those most in need, ensuring inclusive growth for all.

Over the years, the Foundation's work has touched the lives of more than 8.4 million people, with women making up 54% of the community members/program participants. It has also extended meaningful support to over 16,800 persons with disabilities, helping them lead more empowered and dignified lives.

In caring for the environment, HCLFoundation has taken significant steps by:

- Planting over 3.5 million saplings,
- 1,60,000+ animals treated and protected,
- 1,63,000 people linked with social security schemes (SSS-Aadhar Card, Bank Account, PAN Card, Artisan Card, Ayushman Bharat, Ujjwala Yojana, Sukanya Samriddhi Yojana)

These efforts reflect not just numbers, but a deep sense of responsibility - to people, communities, and the planet.

Principle – 5 Businesses should respect and promote human rights

Essential Indicators

1. **Employees and workers who have been provided training on human rights issues and policy(ies) of The Company:**

Category	FY26			FY25		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees / workers covered (D)	% (D / C)
Employees						
Permanent	227,181	212,200	93.41%	223,420	208,747	93.43%
Other than Permanent	9,917	7,985	80.52%	11,076	9,076	81.94%
Total Employees	**237,098**	**220,185**	**92.87%**	**234,496**	**217,823**	**92.88%**
Workers						
Permanent	-					
Other than Permanent						
Total Workers						

Note:

1. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*

2. **Details of minimum wages paid to employees and workers:**

Category	FY26					FY25				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Permanent Employees										
Male	159,550	-	-	159,550	100%	158,943	-	-	158,943	100%
Female	67,197	-	-	67,197	100%	64,364	-	-	64,364	100%
Others	434	-	-	434	100%	113	-	-	113	100%
Other than Permanent Employees										
Male	7,120	-	-	7,120	100%	8,131	-	-	8,131	100%
Female	2,700	-	-	2,700	100%	2,853	-	-	2,853	100%
Others	97	-	-	97	100%	92	-	-	92	100%
Workers										
Permanent	-									
Male										
Female										
Other than Permanent										
Male										
Female										

Note:

1. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*
2. *Disclosing gender is voluntary for HCLTech employees. The employees who have not disclosed their gender are categorized as 'others'.*
3. *HCLTech operates across multiple countries. Legal minimum wage requirements vary by country and are determined by factors such as role, location, and applicable regulations. The Company has established processes to ensure that all employees are compensated in line with or above applicable minimum wage requirements in each jurisdiction and maintains ongoing monitoring mechanisms to support compliance with local laws.*

3. **Details of remuneration/salary/wages**

   a. **Median remuneration/wages:**

Category	Male		Female		Others	
	Number	Median remuneration/ salary/ wages of respective category (₹ Lakhs per annum)	Number	Median remuneration/ salary/ wages of respective category (₹ Lakhs per annum)	Number	Median remuneration/ salary/ wages of respective category (₹ Lakhs per annum)
Board of Directors (BoD)	4**	153	5	168	0	-
Key Managerial Personnel (KMP*)	3	760	0	-	0	-
Employees other than BoD and KMP*	166,106	14.83	69,361	8.24	592	20.05
Workers	-					

Note:

1. **Adjusted using Purchasing Power Parity (PPP) factors to compare global salaries across countries*
2. *Remuneration of CEO and Managing Director has been included in KMP information.*
3. *Key Managerial Personnel includes CEO and Managing Director, Chief Financial Officer and Company Secretary.*

4. ***Information regarding the Directors and KMPs who have either joined or ceased to be director during the financial year is incomparable and has not been considered.*
5. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*

3. b. Gross wages paid to females as % of total wages paid by the entity, in the following format:

	FY26	FY25
Gross wages paid to females as % of total wages	20.74%	20.49%

4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

Yes

Srinivasan Govindan (srinivasangn@hcltech.com), Vice President – People Function, is responsible for addressing human rights related issues.

Employees are urged to report any issues pertaining to Human Rights to the Reporting Manager and/or the Global Ethics Helpline or email to whistleblower@hcltech.com. Employees based in Germany/Netherlands can continue to raise their concerns and grievances by emailing to whistleblower@hcltech.com.

5. Describe the internal mechanisms in place to redress grievances related to human rights issues.

Employees and Individuals affected have access to mechanisms to raise concerns and such mechanisms are accessible, equitable and transparent. Any Employee or Individual may report a concern in writing or orally by communicating it either to their concerned reporting manager or Human Resources (HR). Employees can also raise concerns by submitting their grievance in the Global Ethics Helpline.

The aggrieved employee or individual can also address their concerns to the Ethics Committee via whistleblower@hcltech.com. Employees and individuals are advised to submit a written complaint narrating the true sequence of the events leading to the violation along with any supporting evidence. Concerns may be reported as confidential or on an anonymous basis. We are committed to keeping the identity of the reporting employee or individual confidential to the maximum extent as consistent with The Company's legal obligations but subject to The Company's need to investigate reported violations.

6. Number of complaints on the following made by employees and workers:

Particulars	FY26			FY25		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	45	5	Please refer to the note below**	55	5	Please refer to the note below**
Discrimination at Workplace	0	-	-	0	NA	-
Child Labor	0	-	-	0	NA	-
Forced Labor/Involuntary Labor	0	-	-	0	NA	-
Wages	0	-	-	0	NA	-
Other human rights related issues	0	-	-	0	NA	-

Note:

1. *Complaints disclosed are global.*
2. *Complaints disclosed as on March 31 of the respective financial year.*
3. ***The investigation has established regulations and framework for hearing of the cases and submission of the report. The final report is made available to the concerned audience as per the norms.*

7. **Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format:**

Particulars	FY26	FY25
	Filed during the year	Filed during the year
Total complaints reported under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	31	44
Complaints on POSH as a % of female employees/workers	0.06%	0.09%
Complaints on POSH upheld	20	30

Note:

1. *POSH Act is India specific, hence disclosed numbers are for India operations.*

8. **Mechanism to prevent adverse consequences to the complainant in discrimination and harassment cases.**

The Company has established a robust and transparent grievance redressal framework to ensure that individuals who raise concerns related to discrimination or harassment are fully protected throughout and beyond the process. Key mechanisms include:

- Anti-Retaliation Policy
- Confidentiality Safeguards
- Transparent and Time-Bound Grievance Handling
- Protection During and Post Inquiry e.g. interim transfer, administrative leave etc.
- Recourse Against False or Malicious Complaints

Regular awareness and policy dissemination ensure employees are aware of their rights, the available channels for raising concerns, and the protections afforded to them under the policy. This is aligned with the requirements under the POSH Act, 2013, ILO principles, and The Company's commitment to a safe, inclusive, and dignified workplace for all.

9. **Do human rights requirements form part of your business agreements and contracts? (Yes/No)**

Yes

10. **Assessments for the year:**

Particulars	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child Labor	100%
Forced/Involuntary Labor	100%
Sexual Harassment	100%
Discrimination at workplace	100%
Wages	100%
Others – please specify	100%

Note:

1. *For India locations with operational control.*

11. **Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 10 above.**

No significant risks/concerns were identified.

Leadership Indicators

1. **Details of a business process being modified/introduced as a result of addressing human rights grievances/complaints.**

No significant changes in process were required resulting from the grievances and complaints this year.

2. **Details of the scope and coverage of any Human rights due-diligence conducted**

Human Rights assessment was carried out covering all eight core Human Rights elements (Child, Forced Labor, Fair, Living Wages, Working Hours, Discrimination, Grievance forum and Health and Safety) and has been evaluated in line with globally recommended standards and principles, including ETI, SA8000, UN Guiding Principles (UNGP), and UN Business and Human Rights Principles (UNBCP).

HCLTech has integrated human rights considerations into its operations as well as the new vendor onboarding assessment process, tailoring it to the types of services provided to The Company. HCLTech's Green Procurement Policy and Supplier Code of Conduct lay out The Company's expectations surrounding ethical behavior, labor practices, environmental responsibility, and governance standards. Additionally, HCLTech has a Whistleblower Policy in place that details how to file a complaint, and this information is accessible to all stakeholders. In case of any concerns, vendors can reach out via email at whistleblower@hcltech.com for resolution. Also, HCLTech follows Periodic Assessment as part of the vendor risk management program (R&C).

3. **Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?**

Yes, The Company's offices are accessible to differently abled visitors as per the requirements of the Rights of Persons with Disabilities Act, 2016.

4. **Details on assessment of value chain partners:**

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual harassment	76.4%
Discrimination at workplace	
Child labor	
Forced/involuntary labor	
Wages	
Others – please specify	

5. **Provide details of any corrective actions taken or underway to address significant risks/concerns arising from the assessments at Question 4 above**

Appropriate training and capacity building are conducted based on the concerns arising from the assessments. Additionally, HCLTech provides its vendors with an ESG manual and learning platform that outlines its sustainability objectives and expectations, including human rights.

Principle – 6 Businesses should respect and make efforts to protect and restore the environment

Essential Indicators

1. **Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:**

Parameter	FY26	FY25
From renewable sources (GJ)		
Total electricity consumption (A)	456,327.52	323,444.62
Total fuel consumption (B)	0.00	0.00
Energy consumption through other sources (C)	0.00	0.00
Total energy consumed from renewable sources (A+B+C)	**456,327.52**	**323,444.62**
From non-renewable sources (GJ)		
Total electricity consumption (D)	443,794.29	606,340.86
Total fuel consumption (E)	16,343.38	10,907.49
Energy consumption through other sources (F)	0.00	0.00
Total energy consumed from non-renewable sources (D+E+F)	**460,137.67**	**617,248.36**
Total energy consumed (A+B+C+D+E+F)	**916,465.19**	**940,692.98**
Energy intensity per rupee of turnover (Total energy consumed/ Revenue from operations) (GJ/Million ₹)	0.70	0.80
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed / Revenue from operations adjusted For PPP) (GJ/million USD)	14.32	16.42
Energy intensity in terms of physical output (GJ/capita/annum)	3.87	4.01

Note:

1. GJ is Gigajoule

2. *Revenue from operations has been adjusted for PPP using the World Bank's conversion factor for FY26. For FY25, it has been adjusted and restated using the World Bank's factor for FY25.*
3. *For FY25, the figure for "energy intensity in terms of physical output (GJ/capita/annum) is recalculated at 4.01 GJ/capita/annum. This revision is attributable to a methodological change, transitioning from an FTE-based approach to a workforce-based calculation.*
4. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes. Assurance was carried out by DNV Business Assurance India Private Limited.

2. Does the entity have any sites/facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.

Not Applicable, HCLTech is a Software and IT service company and does not fall under the Perform Achieve and Trade scheme.

3. Provide details of the following disclosures related to water:

Parameter	FY26	FY25
Water withdrawal by source (in kiloliters)		
(i) Surface water	0.00	0.00
(ii) Groundwater	167,442.15	261,965.02
(iii) Third-party water	647,256.88	332,476.36
(iv) Seawater/desalinated water	0.00	0.00
(v) Others (Rainwater, generated drinking water from Air, AHU Condensation)	130,151.39	255,486.96
Total volume of water withdrawal (in kiloliters) (i + ii + iii + iv + v)	**944,850.42**	**849,928.34**
Total volume of water consumption (in kiloliters)	**925,715.16**	**834,013.09**
Water intensity per rupee of turnover (Total water consumption / Revenue from operations (KL/Million ₹)	0.71	0.71
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP) (KL/million USD)	14.47	14.56
Water intensity in terms of physical output (KL/capita/annum)	3.90	3.56

Note:

1. *Revenue from operations has been adjusted for PPP using the World Bank's conversion factor for FY26. For FY25, it has been adjusted and restated using the World Bank's factor for FY25.*
2. *Intensity is measured per million units.*
3. *For FY25, the water intensity in terms of physical output (KL/capita/annum) has been revised to 3.56 KL/capita/annum. This revision is attributable to a methodological change, transitioning from an FTE-based approach to a workforce-based calculation.*
4. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) If Yes, the name of the external agency.

Yes. Assurance was carried out by DNV Business Assurance India Private Limited.

4. **Provide the following details related to water discharged:**

Parameter	FY26	FY25
Water discharge by destination and level of treatment (in kiloliters)		
i. To Surface Water	-	-
-No treatment	-	-
-With treatment – please specify the level of treatment	-	-
ii. To Groundwater	-	-
-No treatment	-	-
-With treatment – please specify the level of treatment	-	-
iii. To Seawater	-	-
-No treatment	-	-
-With treatment – please specify the level of treatment	-	-
iv. Sent to third parties	-	-
-No treatment	19,135.25	15,915.25
-With treatment – please specify the level of treatment	-	-
v. Others	-	-
-No treatment	-	-
-With treatment – please specify the level of treatment	-	-
Total water discharged (in kiloliters)	**19,135.25**	**15,915.25**

Note:

1. Data in the table above covers only India operations.

Note: Indicate if any independent assessment/evaluation/assurance has been carried out by an external agency? (Y/N) if yes, name of the external agency

Yes. Assurance was carried out by DNV Business Assurance India Private Limited.

5. **Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.**

Yes. We have implemented a Zero Liquid Discharge (ZLD) mechanism across applicable facilities. Under this system, wastewater generated from operations is treated through onsite Sewage Treatment Plants and further processed. Treated water is reused for non-potable applications including cooling systems, flushing, and landscaping, while residual solids are safely managed through authorized disposal channels. The ZLD implementation ensures that no wastewater is discharged outside the premises, supporting water conservation objectives and compliance with regulatory requirements.

6. **Please provide details of air emissions (other than GHG emissions) by the entity.**

Parameter	Please specify unit	FY26	FY25
NOx	Tons	1.15	2.52
SOx	Tons	0.12	0.19
Particulate matter (PM)	Tons	0.29	0.38
Persistent organic pollutants (POP)	Tons	0	0
Volatile organic compounds (VOC)	Tons	0	0
Hazardous air pollutants (HAP)	Tons	0	0
Others-please specify	Tons	0	0

Note: Indicate if any independent assessment/evaluations/assurance has been carried out by an external agency? (Y/N) if yes, name of the external agency.

Yes. Assurance was carried out by DNV Business Assurance India Private Limited.

7. **Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity:**

Parameter	Unit	FY26	FY25
Total Scope 1 emissions (Break-up of the GHG into CO_2, CH_4, N_2O, HFCs, PFCs, SF_6, NF_3, if available)	Metric tons of CO_2 equivalent	12,084.58	12,900.5
Total Scope 2 emissions (Break-up of the GHG into CO_2, CH_4, N_2O, HFCs, PFCs, SF_6, NF_3, if available)	Metric tons of CO_2 equivalent	86,864.44	109,074.02
Total Scope 1 and Scope 2 emission per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions/Revenue from operations)	Metric tons of CO_2 equivalent/million ₹	0.076	0.10
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions/Revenue from operations adjusted for PPP)	Metric tons of CO_2 equivalent/million USD	1.55	2.13
Total Scope 1 and Scope 2 emission intensity in terms of physical output	Metric tons of CO_2 equivalent/capita/ annum)	0.42	0.52

Note:

1. *Revenue from operations has been adjusted for PPP using the World Bank's conversion factor for FY26. For FY25, it has been adjusted and restated using the World Bank's factor for FY25.*
2. *Intensity is measured per million units.*
3. *For FY25, the figure for Total Scope 1 and Scope 2 emission intensity in terms of physical output (Metric tons of CO2 equivalent/capita/annum) is recalculated at 0.52 MT CO2 equivalent/capita/annum. This revision is attributable to a methodological change, transitioning from an FTE-based approach to a workforce-based calculation.*
4. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*
5. *Scope 2 emissions are market-based emissions.*

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency. (Y/N) If yes, the name of the external agency.

Yes. Assurance was carried out by DNV Business Assurance India Private Limited.

8. **Does the entity have any project related to reducing Green House Gas emissions? If yes, then provide details.**

Yes. List of initiatives is given below:

- **Renewable Energy**

  In a key milestone toward strengthening its renewable energy portfolio, HCLTech has begun procuring renewable power under the Open Access – Group Captive model, with Power Purchase Agreements (PPA) and Subscription Shareholding Agreements (SSHA) finalized for its Noida and Lucknow campuses, significantly increasing the share of renewable energy in The Company's overall power mix; these developments represent a concrete step toward HCLTech's global ambition of achieving 80% renewable electricity by 2030 and have contributed to an increase in the renewable energy share from 34.38% in FY25 to 49.79% in FY26.

- **On-Site Solar PV Project**

  Solar PV modules were installed to substitute portion of grid energy which improves the facility adoption and increase the share of Renewable energy, and the system is connected to an IoT platform for easy monitoring and reliable operation.

Installed Capacity:

Installation of 80 kWp Rooftop Solar Power Plant at the Vijayawada SEZ generating 116.8MWh/Year electricity.

Installation of 350 kWp Rooftop Solar Power Plant at the Bengaluru Jigani Campus generating 500MWh/Year of electricity.

Installation of 73 kWp Rooftop Solar Power Plant at the Madurai Campus generating 25-30MWh/Year electricity

- **Transport Sustainability through Electric Vehicles**

  In FY24, the successful rollout of electric vehicles (EVs) in Bengaluru and Hyderabad marked a key milestone in advancing our sustainable mobility initiatives. Through structured long-term contracts and phased scaling, EV adoption significantly increased across both locations.

Bengaluru:

EV operations commenced with an initial deployment of 15 vehicles, which scaled up to 75 EVs by March 2026. During this period, a total of 85,873 trips were undertaken annually, with EVs contributing to 31% of the overall trips.

Hyderabad:

The EV program began with 106 vehicles and was expanded to 151 EVs by March 2026. Out of 137,631 total annual trips, EVs accounted for approximately 80% of the trip coverage, demonstrating a higher level of electrification maturity at this location.

- **EC Fan–Based AHU Modernization with Enhanced IAQ Control**

  Across the HCLTech campuses at Noida, Chennai, and Bengaluru, aging conventional Air Handling Units (AHUs) were upgraded to modern EC fan–based AHUs to improve energy efficiency, reliability, and indoor air quality (IAQ). The initiative was driven by the need to replace end of life AHUs—many over 15–20 years old—and to address poor particulate control in high pollution regions. At Noida SEZ 126 (Tower 1), the first phase replaced 24 out of 39 AHUs with high efficiency EC fans and Super Fine Filters, capable of achieving up to 90% PM2.5 control. Similar upgrade standards are being adopted as best practices for Chennai and Bengaluru campuses. The project involved detailed condition assessments, technical evaluations, phased installation to avoid business disruption, and integration with BMS and AQI based controls. Post implementation validation showed up to 15% energy savings, PM2.5 reduction of around 50%, lower noise levels, and improved occupant comfort. Employees benefited from healthier indoor environments, while HCLTech gained from lower maintenance costs and reduced carbon footprint. Overall, the initiative sets a scalable and sustainable benchmark for HVAC modernization across HCLTech campuses. With many AHUs nearing end of life, phased EC fan retrofits offer long term energy, health, and environmental benefits and are being rolled out progressively across Noida, Chennai, and Bengaluru.

- **HRW Implementation**

  At the HCLTech Chennai and Bengaluru campuses, the existing conventional Heat Recovery Wheel (HRW) systems were upgraded with an advanced free cooling mode to improve energy efficiency. Traditionally, HRW units maintained indoor air quality but limited air volume and depended heavily on chillers for cooling. To maximize the benefit of favorable outdoor conditions, especially during winter seasons and night-time operations, the HRW systems were enhanced in collaboration with the OEM. The upgraded configuration allows the direct use of cool outdoor air to optimize AHU heat loads. A micro-PLC-based automation system continuously monitors indoor and outdoor temperatures and automatically activates free cooling whenever conditions are suitable.

  This intelligent control strategy significantly reduces chiller load, resulting in substantial electricity savings, lower operational costs, reduced carbon emissions, and improved system efficiency. The initiative demonstrates a smart and sustainable approach to HVAC optimization and supports long-term energy and environmental goals at both the Chennai and Bengaluru campuses

- **HVLS Fan Implementation for Energy Efficient Café Operations**

  At the HCLTech Noida SEZ 126, Chennai and Bengaluru campuses, High Volume Low Speed (HVLS) fans were implemented in cafeteria areas to enhance thermal comfort and reduce dependence on conventional HVAC systems. HVLS fans improve air circulation by moving large volumes of air at low energy consumption, ensuring uniform temperature distribution and eliminating hotspots. This allowed a significant reduction in AHU usage—by up to 50% during peak hours—without compromising occupant comfort. The project included airflow assessment, energy saving analysis, structural validation, and post installation performance monitoring. Key success factors included detailed planning, temperature monitoring during commissioning, and coordination with café operations to ensure smooth adoption. Overall, the initiative delivered measurable energy savings, enhanced employee comfort, and strongly aligned with HCLTech's sustainability and carbon reduction goals, making it a scalable best practice for similar spaces across both Noida and Bengaluru campuses.

- **UPS Optimization**

  As part of the campus wide energy efficiency and sustainability initiative, the existing conventional UPS system was successfully upgraded to a modular UPS architecture at Bengaluru Campus. This upgrade included downsizing the installed UPS capacity to align with actual load demand.

  By optimizing UPS sizing and adopting modern, high efficiency modular technology, the project delivered significant energy and environmental benefits.

  In addition to energy and emissions reduction, the project enhances operational efficiency, reduces electricity costs, and strengthens the organization's commitment towards sustainability and responsible energy management. The modular UPS system also improves future scalability and resilience, ensuring capacity can be efficiently matched to evolving load requirements.

- **Cooling Tower Automation Using WBT & EBT Sensors**

  During FY26, an advanced automation system was implemented at the HCLTech Madurai Campus to improve cooling tower efficiency and reduce energy consumption. The system uses Wet Bulb Temperature (WBT) and Entering Water Temperature (EBT) sensors to calculate enthalpy and intelligently control cooling tower fan operations. Based on real time ambient and condenser water conditions, cooling tower fans are automatically modulated through Variable Frequency Drives (VFDs). This ensures the fans operate only at the required speed, avoiding unnecessary energy use.

  Accurate sensor placement and data driven automation were key success factors. Overall, the project enhanced operational efficiency, reduced electricity consumption, and supported sustainability goals at the Madurai campus.

- **Enthalpy Based AHU Fan Automation for HVAC Energy Efficiency**

  At the HCLTech Madurai Campus, an enthalpy-based HVAC control system was implemented to improve indoor comfort while reducing energy consumption. The system uses temperature and humidity sensors to calculate air enthalpy and automatically controls Air Handling Unit (AHU) fans through Variable Frequency Drives (VFDs). By continuously monitoring indoor and ambient air conditions, the system dynamically adjusts fan speed and fresh air intake based on real time demand. This adaptive control ensures optimal indoor conditions under varying occupancy and load scenarios. Accurate sensors and well-defined control logic were key success factors. Overall, the solution enhanced HVAC efficiency, reduced power consumption, and supported sustainable building operations at the Madurai campus

- **Green Building Certification**

  Firstly, a substantial portion of our real estate portfolio is aligned with globally recognized green building standards. During the reporting period, 13.80 million square feet of our building space—has been certified under several leading Green Building Certification programs. These include certifications such as LEED by the USGBC, IGBC, BREEAM, CASBEE, NABERS, Green Star (Australia), EDGE, and TRUE (Total Resource Use and Efficiency), among others. This demonstrates our dedication to high standards across diverse geographies.

  Looking at our owned assets, the sustainability performance is particularly noteworthy. Of the total company-owned building portfolio, 98.43% - equivalent to 11.20 million square feet has achieved the highest 'Platinum' level certification. This underscores our focus on energy efficiency, minimizing environmental impact, enhancing occupant well-being, and ensuring long-term asset resilience. These certifications bring tangible benefits, including reduced energy and water consumption, improved zero waste performance, better indoor environmental quality, and lower operational emissions, all of which align closely with our broader ESG objectives.

  Additionally, sustainability considerations are increasingly being factored into our leasing decisions. Our leased portfolio, amounting to 2.59 million square feet, is certified by recognized Green Building Councils. This reflects our proactive engagement with landlords and stakeholders to promote environmentally responsible workplaces, both in owned and leased assets.

- **APGC Based Self Powered Urinal Sensor Implementation**

  At the HCLTech Noida Campus (SEZ 126), Towers 5 and 6, an innovative APGC based self-powered urinal sensor solution was implemented to improve hygiene, eliminate battery dependency, and support HCLTech's sustainability goals. Traditional battery-operated urinal sensors required frequent maintenance, incurred recurring costs, and generated significant battery waste.

  The APGC (Advanced Power Generation by Circulation) sensors generate their own power using water flow, eliminating the need for electricity or disposable batteries. Following an initial assessment of sensor failures and environmental impact, a 60-day pilot validated the reliability, flushing consistency, and maintenance free performance of the technology. Based on successful results, the solution was deployed across one full wing of Towers 5 and 6 during Q3 2025.

  This initiative replaced 142 battery operated sensors, eliminating the annual disposal of 1,704 nine-volt batteries and delivering annual cost savings of approximately ₹15.33 lakh in energy, battery, and labor expenses. Continuous monitoring by Tower AFMs and regular reviews ensured consistent hygiene and operational reliability. Overall, the project significantly reduced e waste, enhanced washroom hygiene, lowered maintenance effort, and demonstrated a highly replicable, sustainable solution suitable for large scale deployment across the Noida campus and future expansions

- **Automated Sand Filter Operations Using Motor Operated Valves (MOVs)**

  At the HCLTech Madurai Campus, Motor Operated Valves (MOVs) were installed in the STP and WTP sand filtration systems to improve operational efficiency and reduce water loss. Earlier, filtration and backwash operations relied heavily on manual intervention, which led to inefficiencies and inconsistent control. With MOV based automation, filtration and backwash cycles are now automatically triggered only when required and for the optimal duration.

This has reduced manual effort by 20–30%, improved filtration efficiency and system reliability, and increased recycled water availability by around 3%. The success of the initiative was driven by well-designed automation logic and reliable valve performance. Overall, the project enhanced water treatment efficiency, conserved water resources, and strengthened sustainable water management practices at the Madurai campus.

- **Sensor Based Water Franking System for Sustainable Garden Irrigation**

  A sensor-based Water Franking System was implemented at the Madurai Campus to optimize water usage for gardening. The system uses treated water from the STP and supplies it through automated drip irrigation controlled by soil moisture sensors. Water is released only when the soil needs it, preventing over irrigation and unnecessary waste. This has led to improved irrigation efficiency, healthier landscaping. The solution strengthened sustainable water management practices, reduced dependency on STP water for landscaping, and supported environmental goals. Regular sensor calibration and seasonal adjustments were identified as key learning areas to maintain long term performance.

- **Enhancing Water Quality Compliance with Inline Digital Sensors**

  To strengthen water quality management at the Vijayawada campus, real-time digital inline sensors were deployed across the Water Treatment Plant (WTP) and Reverse Osmosis (RO) systems, replacing manual testing practices. This intervention has enabled continuous monitoring of critical water quality parameters such as pH, TDS, and hardness, with automated alerts and trend analysis supporting faster and proactive corrective action.

  As a result, the initiative has reduced dependence on manual sampling, improved response times to water quality deviations, and enhanced compliance with potable and process water quality requirements. It has also helped protect downstream equipment, enabled predictive maintenance, and improved operational reliability. The improved monitoring framework supports more effective decision-making and has strengthened water management outcomes for GES, IFMS, Sustainability, and EHS teams.

- **Retrofit Emission Control Device (RECD) Implementation for DG Sets**

  Diesel Generator (DG) sets are used at the SDC to ensure uninterrupted power supply. However, these DG sets emit pollutants that can affect air quality and make it challenging to meet regulatory standards.

  To address this, a Retrofit Emission Control Device (RECD) solution is being implemented to significantly reduce harmful pollutants such as particulate matter, NOx, CO, hydrocarbons, and smoke. The initiative at Chennai, Abattur-5, Madurai and Vijayawada Campuses benefits EHS, Facilities, and Compliance teams by ensuring adherence to pollution control norms and improving environmental performance. The approach includes assessing DG loads, selecting certified RECD technologies, analyzing current emissions, designing and installing the system with minimal downtime, and coordinating with Pollution Control authorities for approval.

  After installation, certified emissions testing will validate compliance with CPCB standards. Overall, the project will improve air quality, enhance safety, support sustainability and ESG goals, and ensure regulatory compliance while maintaining reliable backup power.

9. Provide details related to waste management by the entity:

Parameter	FY26	FY25
Total Waste generated (in metric tons)		
Plastic waste **(A)**	15.99	10.73
E-waste **(B)**	262.09	156.30
Bio-medical waste **(C)**	4.89	4.37
Construction and demolition waste **(D)**	111.05	39.25
Battery waste **(E)**	345.25	82.67
Radioactive waste **(F)**	0	0
Other Hazardous waste. Please specify, if any. **(G)** (Used or Spent Oil and Oil filters)	18.25	21.68
Other Non-hazardous waste generated **(H).** Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector) (Food waste and other general waste)	1,683.72	1,488.01
Total (A+B + C + D + E + F + G + H)	**2,441.23**	**1,803.02**

Parameter	FY26	FY25
Waste intensity per rupee of turnover (Total waste generated/Revenue from operations) per million ₹	0.0019	0.0015
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP) MT/million USD	0.0382	0.03
Waste intensity in terms of physical output (MT/capita/annum)	0.0103	0.0077
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tons)		
Category of waste		
(i) Recycled	1,763.43	1,660.28
(ii) Re-used	-	-
(iii) Other recovery operations	270.90	-
Total	**2,034.33**	**1,660.28**
For each category of waste generated, total waste disposed by nature of disposal method (in metric tons)		
Category of waste		
(i) Incineration	9.41	9.17
(ii) Landfilling	-	-
(iii) Other disposal operations	-	-
Total	**9.41**	**9.17**

Note:

1. *Revenue from operations has been adjusted for PPP using the World Bank's conversion factor for FY26. For FY25, it has been adjusted and restated using the World Bank's factor for FY25*
2. *Data covers only India operations.*
3. *For FY25, the figure for Waste intensity in terms of physical output (MT/capita/annum) is recalculated at 0.0077 MT/capita/annum. This revision is attributable to a methodological change, transitioning from an FTE-based approach to a workforce-based calculation.*
4. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*

Note: Indicate if any independent assessment/evaluations/assurance has been carried out by an external agency. If yes, the name of the external agency

Yes. Assurance was carried out by DNV Business Assurance India Private Limited.

10. **Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce the usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such waste.**

HCLTech is committed to minimizing waste and advancing circular resource management in line with the principles of Reduce, Reuse, and Recycle. As a significant milestone in its waste management journey, HCLTech-owned campuses in India have achieved Zero Waste to Landfill Platinum Certification, the highest recognition awarded by Green Business Certification Inc. (GBCI) in FY25. This certification recognizes facilities that demonstrate best-in-class waste management systems, transparent tracking, and strong employee engagement, with a requirement to divert at least 90% of waste away from landfills and incineration. We maintained this certification in FY26.

HCLTech campuses in Noida, Chennai, Bengaluru, Lucknow, Vijayawada, Madurai, and Nagpur collectively achieved over 99% diversion of waste from landfills through robust segregation at source, recycling, reuse, and recovery practices. Zero Waste to Landfill Platinum Certification validates HCLTech's systematic approach to waste reduction, disciplined vendor management, and integration of circular economy principles across campus operations. These initiatives have strengthened regulatory compliance, reduced environmental impact, and reinforced responsible consumption and production practices across our India operations.

The following steps/initiatives have been taken by HCLTech.

- Podium Crafted from Repurposed Wood Waste

  A functional and aesthetic podium designed using discarded wood waste, giving new life to surplus timber while reducing landfill contribution and the demand for virgin wood.

- Cocopeat Derived from Sustainable Coconut Husk

  Eco-friendly cocopeat is produced from reused coconut husks, offering a renewable, biodegradable alternative to peat moss while improving soil aeration, water retention, and plant health.

- Eco-friendly Planters Crafted from Overgrown Bamboo Shoots

  Planters manufactured from harvested overgrown bamboo shoots, utilizing a rapid renewable resource and helping manage uncontrolled bamboo growth while promoting sustainable design.

- Waste Coffee Grounds Repurposed for Gardening and Landscaping

  Used coffee grounds collected and processed for use as a natural soil enhancer, improving soil structure, adding organic matter, and diverting organic waste from landfills.

- Reuse of Waste Milk Packets for Plant Nurturing and Distribution

  Discarded milk packets creatively repurposed as seedling containers for nurturing, growing, and distributing plants, promoting single-use plastic diversion through circular reuse.

- Wooden Stand for Planter Pots from Waste Wood

  Durable planter stands made from reclaimed wood waste, combining functional design with resource efficiency while minimizing the use of newly sourced materials.

In addition to these material resources, we use electronic hardware resources. We are on a journey to proactively monitor and manage the e-waste emerging from these resources leading towards the principle of circularity embedded in our hardware use. All e-waste is disposed exclusively through CPCB-authorized recyclers with full traceability. Asset life is extended through repurposing, component cannibalization and refurbishment before final disposal. HCLTech follows defined lifecycle guidelines (4–5 years for end-user computing devices and 7–10 years for domain infrastructure).

11. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals/clearances are required.

No

12. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws in the current financial year:

Nil

13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India, such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment Protection Act, and rules thereunder (Y/N). If not, provide details of all such non-compliances:

Yes

Sr. No.	Specify the law/regulation/ guidelines which was not complied with	Provide details of the non-compliance	Any fines/penalties/action taken by regulatory agencies such as pollution control boards or courts	Corrective action taken, if any
No non-compliance has been noted. HCLTech is compliant with all applicable laws.				

Leadership Indicators

1. Water withdrawal, consumption, and discharge in areas of water stress (in kiloliters):

For each facility/plant located in areas of water stress, provide the following information:

(i) Name of the area: Bengaluru, Chennai, Hyderabad, Lucknow, Madurai, Nagpur, Noida, Pune, Vijayawada

(ii) Nature of operations: IT Services

(iii) Water withdrawal, consumption, and discharge in the following format:

Parameter	FY26	FY25
Water withdrawal by source (in kiloliters)		
(i) Surface water	0.00	0.00
(ii) Groundwater	165,346.08	260,393.23
(iii) Third-party water	375,423.09	330,481.51
(iv) Seawater/desalinated water	-	-
(v) Others	287,325.14	245,446.92
Total volume of water withdrawal (in kiloliters)	**828,094.31**	**836,321.66**
Total volume of water consumption (in kiloliters)	**811,018.31**	**820,406.41**
Water intensity per rupee of turnover (Water consumed/turnover) (KL/Million ₹)	0.62	0.70
Water discharge by destination and level of treatment (in kiloliters)		
(i) Into Surface water	-	-
- No treatment	-	-
- With treatment – please specify the level of treatment	-	-
(ii) Into Groundwater	-	-
- No treatment	-	-
- With treatment – please specify the level of treatment	-	-
(iii) Into Seawater	-	-
- No treatment	-	-
- With treatment – please specify the level of treatment	-	-
(iv) Sent to third parties	-	-
- No treatment	17,076.00	15,915.25
- With treatment – please specify the level of treatment	-	-
(v) Others	-	-
- No treatment	-	-
- With treatment – please specify the level of treatment	-	-
Total water discharged (in kiloliters)	**17,076.00**	**15,915.25**

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency. (Y/N) If yes, the name of the external agency

Yes. Assurance was carried out by DNV Business Assurance India Private Limited.

2. Please provide details of total Scope 3 emissions & their intensity

Parameter	Unit	FY26	FY25
Total Scope 3 emissions (Break-up of the GHG into CO_2, CH_4, N_2O, HFCs, PFCs, SF_6, NF_3, if available)	Metric tons of CO_2 equivalent	314,411.11	269,567.38
Total Scope 3 emission per rupee of turnover (Total Scope 3 GHG emissions/Revenue from operations)	Metric tons of CO_2 equivalent/million ₹	0.24	0.23
Total Scope 3 emission intensity in terms of physical output	Metric tons of CO_2 equivalent/capita/ annum)	1.33	1.14

Note:

1. *For FY25, the figure for Total Scope 3 emission intensity in terms of physical output (MT of CO2 equivalent / capita/annum) is recalculated at 1.14 MT of CO2 equivalent /capita/annum This revision is attributable to a methodological change, transitioning from an FTE-based approach to a workforce-based calculation.*
2. *The workforce data disclosed herein is comprehensive and covers all categories of employees (permanent, other than permanent and workers) across all grades, functions, and locations.*

3. **With respect to the ecologically sensitive areas reported in Question 11 of the essential indicators above, provide details of the significant direct & indirect impact of the entity on biodiversity in such areas along with prevention and remediation activities.**

Not applicable

4. **If the entity has undertaken any specific initiative or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions/effluent discharge/waste generated, please provide details of the same as well as the outcome of such initiatives:**

S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1.	Renewable Energy Adoption	In continuation with its commitment to reduce Carbon footprint, The Company is committed to substitute 80% of electricity with renewable energy by 2030. The source of renewable energy is wind, solar and Hydro based electricity. By transitioning electricity supply to renewable sources globally, The Company has so far transitioned 49.79% of its energy requirement to renewable sources which is equal to 125,208.82 MWh. Out of this, 69,896.43 MWh for its facilities in India which includes 3,023.87 MWh generated from onsite solar plant installations, and 56,861.22 MWh for its international locations.	This has enabled The Company to reduce carbon emissions footprint by 61,738.38 tCO_2e (Tons of Carbon dioxide equivalent) out of which 49,626.446 tCO_2e in India and of 12,111.93 tCO_2e in international locations
2.	High Side: Chiller Operational Performance Improvement	Performance improvement programs such as chiller plant manager and implementing the control measure by set temperature reduction, cooling tower retrofit and fills replacement, removal by increasing cooling tower approach activities were implemented.	These energy efficiency measures delivered savings of 323.57 MWh and reduced 229.73 tCO_2e emissions, strengthening operational efficiency and lowering carbon footprint.
3.	Low Side: HVAC Operational Performance Improvement	Efficiency improvement measures of Low Side of HVAC systems implemented in major facilities which involved energy efficient unit installation, Energy efficient VRF & DX-system installation, AHU belt driven motor replacement to energy efficient EC fan installation, HVAC Optimizing by UPS consolidation related activities.	HVAC efficiency upgrades delivered 856.99 MWh energy savings and reduced 608.46 tCO_2e emissions, strengthening energy performance and lowering carbon intensity.
4.	Energy efficient Lighting and Control	The Company extended its initiative to expand use of LED lighting in all the facilities including workspace, cafe / pantry, pathways, outdoor and basements, and operational control enhancement measures such as installation of motion sensors, daylight harvesting feature which resulted in optimum usage of lighting and energy saving.	These initiatives delivered 175.32 MWh energy savings and reduced 124.47 tCO_2e emissions, improving energy efficiency across facilities.
5.	Technology Adoption	Process improvement in the AHU Conventional type motor replacing into efficient EC fan replacement, Optimization through HVLS fan, AHU fan motor connects through VFD, Energy savings through Cooling tower SBR such as revising Energy savings accrued by these initiatives is 1,076.82 MWh of absolute energy consumption and has helped to reduce 764.54 tCO2e emissions.	AHU and cooling system process optimizations delivered 1,076.82 MWh energy savings and reduced 764.54 tCO_2e emissions, strengthening energy efficiency and lowering carbon impact across facilities.
6.	Water Conservation	The Company's focus on water conservation was strengthened by reducing the water flow by using Scale Bio removal enhanced with a de-ionization in the cooling tower and a garden water sprinkler automation. All this has enabled The Company to conserve 28.50 ML of water.	Water efficiency measures delivered 28.50 million liters of water conservation through optimized cooling tower operations and automated irrigation.
7.	Effective Utilization of UPS	Based on the load demand of the UPS systems, Installation of energy efficient UPS, capacity of the backup has been optimized by shutting down some of the systems. In addition, the activation of passive filters has been taken up.	This Optimization measure resulted in energy savings of 573.96 MWh and emission reduction of 407.51 tCO_2e.

5. **Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.**

   HCLTech has established a robust Business Continuity and Disaster Recovery framework aligned with ISO 22301 and global best practices. The Crisis and Resilience (C&R) program, governed by the Risk and Compliance function under the Chief Risk Officer and overseen by the Board, focuses on safeguarding personnel, protecting assets, and ensuring continuity of critical operations. HCLTech adopts a "Resilience-by-Design" approach across technology, workforce, workplace, and supply chain. Key measures include geographically dispersed data centers, multi-vendor networks, secure scalable remote work, and cyber incident readiness. The framework is validated through periodic simulations and integrates climate risks. Exercises include (1) Call Tree, (2) Tabletop, and (3) Simulation.

6. **Disclose any significant adverse impact on the environment arising from the value chain of the entity. What mitigation or adaptation measure has been taken by the entity in this regard**

   While HCLTech's core operations are not resource-intensive, The Company recognizes that environmental impacts can arise within its value chain, particularly through vendor operations and service delivery partners. These potential impacts include energy consumption, waste management practices, and occupational health and safety performance at supplier locations.

   To minimize and manage such impacts, HCLTech has implemented structured preventive and mitigation measures across the supplier lifecycle. Environmental, Social, and Governance (ESG) criteria are embedded into Request for Proposals (RFPs) and supplier selection processes to ensure sustainability considerations are evaluated upfront. In addition, a risk-based vendor onboarding and assessment framework is followed, which includes pre-qualification on Environmental parameters relevant to the nature and scale of supplier operations.

   Through periodic assessments, contractual expectations, and corrective action mechanisms where required, The Company works proactively with suppliers to identify risks early and prevent adverse environmental impacts before and during engagement. These measures support responsible sourcing, alignment with HCLTech's sustainability objectives, and continuous improvement in environmental performance across the value chain.

7. **Percentage of value chain partners (by the value of business done with such partners) that were assessed for environmental impacts**

S. No.	No. of value chain partners assessed	% of value chain partners (by the value of businesses done with such partners) that were assessed	Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard
1	308	76.4%	No significant adverse impacts identified

8. **How many green credits have been generated or procured?**

   a. By the listed entity

      Nil.

      However, HCLTech, through HCLFoundation, drives tree plantation activities. In total, we have planted over 3.5 million saplings. However, these tree plantation drives are not registered under the Green Credit Program. Hence, not applicable.

   b. By the top ten (in terms of value of purchases and sales, respectively) value chain partners]

      Nil.

Principle – 7 Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.

Essential Indicators

1. a. Number of affiliations with trade and industry chambers/ associations.

43

b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to:

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Confederation of Indian Industry ("CII")	International
2	National Association of Software and Service companies ("NASSCOM")	International
3	Confederation of British Industries (CBI)	International
4	World Economic Forum (WEF)	International
5	Indo-Canada Chamber of Commerce	International
6	Indo-French Chamber of Commerce and Industry (IFCCI)	International
7	Japan Chamber of Commerce and Industry in India (JCCI)	International
8	USISPF (US India Strategic Partnership Forum)	International
9	USIBC (US India Business Council)	International
10	Australia-India Business Council	International

2. Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities.

Name of authority	Brief of the case	Corrective action taken
There were no adverse orders from regulatory authorities.		

Leadership Indicators

1. Details of public policy positions advocated by the entity:

S. No.	Public policy advocated	Method resorted to such advocacy	Whether information is available in the public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	Web Link, if available
1	Agentic AI: Fostering Responsible and Beneficial Development and Adoption	Submission of our inputs for Research paper of The Centre for Information Policy Leadership (CIPL)	Yes	Need basis	https://www.informationpolicycentre.com/resources/agentic-ai-fostering-responsible-and-beneficial-development-and-adoption/
2	EU AI Pact	Signatory of the pledges, Online Survey and Annual Report submitted	Yes	Annually/ As requested	https://digital-strategy.ec.europa.eu/en/policies/ai-pact#ecl-inpage-Voluntary-Pledges
3	US AI Action Plan and AI regulatory framework	Formal submissions to U.S. OSTP & NSF; policy comments and reports	Yes	Need basis	https://files.nitrd.gov/90-fr-9088/US-Chamber-of-Commerce-AI-RFI-2025.pdf

S. No.	Public policy advocated	Method resorted to such advocacy	Whether information is available in the public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	Web Link, if available
4	Cybersecurity policy and information sharing legislation in the US	Submission of our inputs to US Chamber of Commerce which advocated through Coalition letters, submissions to Congress, regulatory comments, industry reports	Yes	Periodic	https://www.uschamber.com/security/cybersecurity
5	Recommendations on Draft Central Rules 2025 for Four Labour Codes	Participation in meetings organized by NASSCOM to share industry view and rationale for the extension	Yes	Others – As and when required	NA
6	Recommendations on IT Industry and opportunities and impact from AI in India	Submission of our suggestions to CII which prepared a detailed note to share with MEITY	No	Others – As and when required	NA
7	Recommendations on India Designs Act, 2000	Submitted recommendations to NASSCOM for Government Stakeholder Consultations on AI and Copyrights	No	Others – As and when required	NA
8	Inputs on digitizing the NHS, UK by 2035 (use of data, AI, interoperability, and patient-centered digital care)	Policy research report with expert consultations and stakeholder discussions	Yes	Others – As and when required	Fabian Society – Anatomy of Success report https://fabians.org.uk/publication/anatomy-of-success/
9	Responsible AI governance and ethical AI deployment in UK (transparency, privacy, accountability in AI use)	Thought leadership via leadership forums, highlighting governance frameworks and Responsible AI practices	Yes	Others – As and when required	NA
10	Security Considerations for Artificial Intelligence Agents	Submitted inputs to National Institute of Standards and Technology (NIST)	Yes	As requested	https://www.federalregister.gov/documents/2026/01/08/2026-00206/request-for-information-regarding-security-considerations-for-artificial-intelligence-agents#open-comment

Principle – 8 Businesses should promote inclusive growth and equitable development.

Essential Indicators

1. **Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.**

   Nil

2. **Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity.**

   Not Applicable

   Note:

   1. *HCLTech is not involved in any land acquisition, infrastructure development projects as per the Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013 Act, therefore, information regarding the above indicators is not applicable.*

3. **Describe the mechanisms to receive and redress grievances of the community.**

   The corporate social responsibility agenda for HCLTech is delivered by HCLFoundation. It deeply upholds the value of accountability and aims to accept, assess, and resolve feedback or complaints received from the community of stakeholders ranging from but not limited to HCLFoundation employees, HCLTech employees, volunteers, third-party employees, consultants associated with Company's projects, NGO partners, social sector organizations, government authorities, program participants, community members and others. Any deviation from the law of the land, HCLTech Code of Conduct or HCLFoundation Child Protection Policy by any stakeholder associated with The Company's programs/projects is taken seriously for review and redressal via multi-pronged, scientific and transparent channels. HCLFoundation aims to ensure that every stakeholder is provided with a safe environment to share their concerns/ grievances. A high level of confidentiality is maintained in sensitive matters to respect and maintain the dignity of the complainant. Redressal of grievances is carried out as per the nature of grievance, based on guidelines defined in the organization's policies. HCLTech's Corporate Social Responsibility Policy can be accessed through this link https://www.hcltech.com/corporate/corporate-social-responsibility-policy and Child Protection Policy can be accessed through this link: https://www.hclfoundation.org/sites/default/files/reading-material/2024-03/child_protection_policy_handbook.pdf

4. **Percentage of input material (inputs to total inputs by value) sourced from suppliers:**

Particulars	FY26	FY25
Directly sourced from MSMEs/ small producers	12%	10%
Directly from within India	90%	83%

   Note:

   1. *Data pertains to procurement in India.*

5. **Job creation in smaller towns –** Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the following locations, as % of total wage cost

Locations	FY26	FY25
Rural	0	0
Semi-urban	0	0
Urban	26.72%	27.41%
Metropolitan	73.28%	72.59%

   Note:

   1. *Places categorized as per RBI Classification System for rural / semi-urban / urban / metropolitan*
   2. *For FY25 the data is restated as per the Classification based on the RBI Guidelines and Census 2011.*

Leadership Indicators

1. **Provide details of actions taken to mitigate any negative social impacts identified in the social impact assessments (Reference: Question 1 of Essential Indicators above):**

   Not Applicable

2. **Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:**

S.No	State	Aspirational District	Amount Spent (in ₹)
1	Chhattisgarh	Bastar	5,004,435
2	Jharkhand	Ranchi	2,500,000
3	Jharkhand	Hazaribagh	2,500,000
4	Madhya Pradesh	Vidisha	4,630,232
5	Madhya Pradesh	Guna	3,850,000
6	Odisha	Koraput	1,900,000
7	Tamil Nadu	Ramanathapuram	9,391,640
8	Rajasthan	Karauli	7,352,775

3.(a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No)

HCLTech has a procurement framework that promotes engagement with small, local, and diverse suppliers, including those from underrepresented groups.

Supplier diversity considerations are integrated into procurement processes, and the definition of "diverse suppliers" varies by geography to reflect local socio-economic contexts, including local minority, gender, veteran, sexual orientation, disability, and economically disadvantaged enterprises.

(b) From which marginalized/vulnerable groups do you procure

Globally, HCLTech's procurement approach is aligned, where applicable, to regulatory and market expectations. Supplier inclusion considerations are applied in line with locally defined criteria. Given differing regulatory contexts globally, definitions and tracking are maintained on a jurisdiction specific basis, and disclosures are aligned accordingly.

(c) What percentage of total procurement (by value) does it constitute

Globally, our diverse spending is 20% of the total procurement spend.

4. **Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional Knowledge**

Not Applicable

5. **Details of corrective actions taken or underway, based on any adverse order in intellectual property-related disputes wherein usage of traditional knowledge is involved.**

Not Applicable

6. **Details of beneficiaries of CSR Projects:**

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	HCLFoundation's flagship program, UDAY, is designed to break the cycle of urban poverty in the immediate neighborhoods of the city, where HCLTech has a presence. Currently, the program operates in eleven cities throughout India, including Noida, Chennai, Bengaluru, Lucknow, Nagpur, Madurai, Vijayawada, Coimbatore, Hyderabad, Kolkata, and Pune	1,403,641	100%
2	The HCLTech Grant is a flagship program of HCLFoundation, which recognizes, strengthens, and empowers NGOs working in the field of rural development. The grant is awarded to PAN India in three thematic categories: Environment, Health, and Education	2,349,895	100%

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
3	HCLFoundation's flagship environment action program, Harit, aims to promote the conservation, restoration, and enhancement of indigenous environmental systems in a sustainable manner through community engagement. The program is currently operational in eighteen states of India, namely Uttar Pradesh, Tamil Nadu, Karnataka, Maharashtra, Andhra Pradesh, Telangana, Odisha, West Bengal, Uttarakhand, Rajasthan, Madhya Pradesh, Sikkim, Arunachal Pradesh, Assam, Meghalaya, Mizoram, Nagaland and Tripura.	125,928	100%
4	Samuday is a flagship program that pioneers sustainable, scalable, and replicable models for the economic and social development of rural areas. This program is run in partnership with central and state governments, local communities, NGOs, knowledge institutions, and allied partners. Crafting an integrated approach, Samuday implements effective interventions across the areas of Agriculture, Education, Health, Infrastructure, Livelihood, and WASH (Water, Sanitation and Hygiene). The program focuses on creating a source code for the comprehensive development of rural areas of Hardoi and Thoothukudi.	3,348,605	100%
5	"My Clean City" is a program aimed at implementing effective solid waste management in Noida and Greater Noida through the transformation of cities into waste-free regions by covering residential welfare associations and urban villages through a range of sustainable strategies.	735,322	100%
6	HCLFoundation is dedicated to assisting the country during times of calamity, whether natural or man-made. The Foundation's Disaster Risk Reduction and Management (DRR/M) efforts in India includes mitigation, relief and response, rehabilitation, and build-back-better projects. The program strives to mitigate the effect of catastrophes and humanitarian crises by supporting people in need.	512,742	100%

Note:

1. *Programs are ongoing in nature; cumulative data is maintained to reflect program continuity and long-term impact for stakeholders.*

Principle – 9 Businesses should engage with and provide value to their consumers in a responsible manner

Essential Indicators

1. **Describe the mechanisms in place to receive and respond to consumer complaints and feedback.**

   HCLTech has established a structured, transparent, and well-governed framework to receive, assess, and respond to consumer and client complaints and feedback in a timely and responsible manner. These mechanisms operate across strategic, governance, and operational levels to ensure effective issue resolution, accountability, and continuous improvement in customer experience.

   Customer feedback is systematically captured through multiple channels, including project-level satisfaction surveys (PCSAT) conducted across active engagements and independently administered account-level satisfaction surveys (ACSAT), which provide an annual health assessment of client relationships. In addition, regular client engagement forums and monthly account-connects enable continuous listening and early identification of concerns.

   Governance and escalation of complaints and feedback are managed through CREST, HCLTech's structured client-cadence framework. Issues raised by clients or identified by line-of-business leadership are reviewed, assigned clear ownership, and tracked through formal governance forums such as Quarterly Business Reviews (QBRs) and Executive Business Reviews (EBRs), ensuring senior management oversight and closure assurance.

Feedback inputs are actioned through CRISP (Client Relationship Improvement and Solutioning Partnership), an enterprise-wide framework that focuses on root-cause analysis, corrective and preventive actions, and solutioning. This ensures that customer feedback translates into measurable service improvements and institutional learning.

Strategic oversight is further strengthened through Customer Advisory Boards (CABs), comprising CXO-level client representatives, which provide directional guidance on service delivery, governance effectiveness, and evolving customer expectations.

Separately, HCLTech maintains an independent Whistleblower Mechanism for all stakeholders, including customers, to report unethical or improper practices, reinforcing ethical conduct and trust.

Collectively, these mechanisms ensure responsible engagement with consumers, effective grievance redressal, and alignment with BRSR Principle 9 and global ESG expectations on customer protection and responsiveness.

2. Turnover of products and/or services as a percentage of turnover from all products/services that carry information about:

Particulars	As a percentage to total turnover
Environmental and social parameters relevant to the product	Not Applicable
Safe and responsible usage	Not Applicable
Recycling and/or safe disposal	Not Applicable

Note:

1. *HCLTech does not produce any physical products; therefore, information regarding the above indicators is not applicable.*

3. Number of consumer complaints in respect of the following:

Particulars	FY26			FY25		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	NIL	NIL	-	NIL	NIL	-
Advertising	NIL	NIL	-	NIL	NIL	-
Cyber-security	NIL	NIL	-	NIL	NIL	-
Delivery of essential services	NA	NA	-	NA	NA	-
Restrictive Trade Practices	NIL	NIL	-	NIL	NIL	-
Unfair Trade Practices	NIL	NIL	-	NIL	NIL	-
Other	NA	NA	-	NA	NA	-

Note:

1. *Incidents were assessed based on HCLTech's materiality thresholds. Only material incidents are reported.*

4. Details of instances of product recalls on account of safety issues:

Particulars	Number	Reasons for recalls
Voluntary recalls	Not Applicable	Not Applicable
Forced recalls	Not Applicable	Not Applicable

Note:

1. *HCLTech does not produce any physical products; therefore, information regarding the above indicators is not applicable.*

5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a web link to the policy.

Yes.

HCLTech has established a comprehensive framework along with supporting policies and processes to address cybersecurity and data privacy risks in the rapidly evolving threat landscape. This framework delineates the principles, guidelines, and measures aimed at safeguarding digital assets and protecting sensitive information. It includes risk assessment procedures, mitigation strategies, incident response protocols, and regular compliance checks to ensure conformity with legal and regulatory standards.

The cybersecurity practices at HCLTech are aligned with the Global NIST cyber security framework and international industry security standards such as ISO 27001:2022. HCLTech's privacy program is supported by an enterprise-wide Privacy and Data Protection Framework that is tailored to accommodate HCLTech's operations, nature, scope and sensitivity of personal data, legal, regulatory, contractual obligations, risks to data, and defined privacy principles and privacy standards such as ISO 27701 Privacy Information Management System, more details about the program are available at Privacy Trust Center.

HCLTech has established minimum baseline control standards and a defense in depth approach to ensure privacy and cyber security controls are embedded throughout the asset, identity, and data lifecycle.

Continuous validation of controls such as vulnerability assessments, penetration testing, breach and attack simulation (e.g., phishing simulations) etc. covering all infrastructure and application assets is performed to continually manage our risk posture.

A 24x7 Cyber Defense Center is established to Identify and respond to any potential threats to HCLTech environment. The effectiveness of the privacy and cyber security controls at HCLTech is monitored and tested internally by an independent internal audit team as well as by independent external third parties on a periodic basis. At HCLTech, we take pride in pursuing ways to enhance privacy and cyber security knowledge and awareness and embed a culture of privacy and data protection throughout the organization.

Employees and third-party resources undergo mandatory enterprise-wide privacy and cyber security training covering key privacy and cyber security concepts, principles, laws, best practices, and contractual obligations. HCLTech has also created an extensive network of privacy and cyber security champions who play a critical role in embedding and reinforcing privacy and cyber security knowledge and best practices at an operational level. All policies, processes and training and awareness content are hosted on HCLTech' s intranet portals and available to all users.

The Privacy and Cyber Security programs at HCLTech are overseen by the Chief Privacy Officer (CPO) and Chief Information Security Officer (CISO), respectively. HCLTech has also appointed an external global Data Protection Officer to provide assurance, accountability, and independence as is necessary for complying with privacy laws.

Further as a proactive measure and to ensure enhanced protection of personal data processed globally at HCLTech offices, we have documented and implemented our Binding Corporate Rules (BCRs) framework and are in the process of seeking approval for our BCR applications both as a data controller and processor from EU/EEA data protection authorities.

HCLTech's global privacy policy sets out the mandate for the organization regarding personal data processing activities both as a controller and data processor. The policy requires all processing activities to be lawful and comply with a defined set of privacy principles outlined in the privacy policy such as purpose limitation, necessity and proportionality, data minimization, security, and storage limitation, etc. HCLTech only processes personal data for the purpose it was collected and in line with legal requirements, secondary use of data without an individual's permission is not recommended. HCLTech respects the rights of data subjects and has enabled an easy-to-use and external-facing Data Subject Rights Portal for data subjects to exercise their rights as per applicable laws and regulations.

6. **Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of clients; re-occurrence of instances of product recalls; penalty/action taken by regulatory authorities on safety of products/services.**

   HCLTech has a well-defined, Information Cyber Security and Privacy Incident Handling Procedure covering Security and privacy incidents. Any incidents reported to the Incident Response team are Triaged as per the process, Incident Response Playbook is followed, it's analyzed for the root cause, and corrective and preventive action is taken.

   No reported incident is underway with Regulators

7. **Provide the following information relating to data breaches:**

   a. **Number of instances of data breaches**

      Nil

   b. **Percentage of data breaches involving personally identifiable information of clients**

      Not applicable

   c. **Impact, if any, of the data breaches**

      Not applicable

Leadership Indicators

1. **Channels/platforms where information on products and services of the entity can be accessed (provide web link, if available)**

   https://www.hcltech.com

2. **Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.**

   We educate our clients and consumers about the responsible use of AI, that addresses the aspects of bias, ethics, accountability, safety in development and deployment of AI. More can be found in Responsible AI Transparency Report (https://www.hcltech.com/responsible-ai-transparency-report)

3. **Mechanism in place to inform consumers of any risk of disruption/discontinuation of essential services.**

   Not applicable

4. **Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If Yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to major products/services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)**

   HCLTech does not produce any physical products; therefore, information regarding display of product information is not applicable.

   HCLTech views customer engagement as a strategic collaboration aimed at managing, fulfilling, and adding value to client relationships. The Company employs ACSAT, a comprehensive customer feedback framework designed to systematically gather client input and feedback across engagements. ACSAT enables HCLTech to continuously enhance its services, align delivery with customer expectations, and drive measurable improvements in client experience across all significant locations of operation globally.

INDEPENDENT ASSURANCE STATEMENT

to the Management of HCL Technologies Ltd

HCL Technologies Ltd (Corporate Identity Number L74140DL1991PLC046369, hereafter referred to as 'HCLTech' or 'the Company') commissioned DNV Business Assurance India Private Limited ('DNV', 'us' or 'we') to undertake an independent assurance of the Company's disclosures in Business Responsibility and Sustainability Report (hereafter referred as 'BRSR') for Financial Year (FY) 26. The disclosures include BRSR Core as per Annexure 17A and the rest non-financial disclosures in BRSR as per Annexure 16 of SEBI's Master Circular for BRSR (Master Circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026, dated January 30, 2026).

Our Conclusion:

Reasonable level of Assurance- BRSR Core

Based on our review and procedures followed for reasonable level of assurance, DNV is of the opinion that, in all material aspects, the BRSR Core Key Performance Indicators (KPIs) under 9 ESG attributes (as listed in Annexure I of this statement) for FY26 are reported in accordance with reporting requirements outlined in Industry Standard on Reporting of BRSR Core.

Limited Level of Assurance- BRSR Disclosures

On the basis of the assessment undertaken, nothing has come to our attention to suggest that the non-financial disclosures in BRSR do not properly adhere to the reporting requirements as per BRSR reporting guidelines in Annexure 16 of SEBI's Master Circular.

Scope of Work and Boundary

The scope of our engagement includes independent assurance of 'BRSR Core' – Reasonable level of assurance and rest non-financial disclosures in BRSR – Limited Level of Assurance for FY26.

Reasonable assurance of BRSR Core: Boundary covers the performance of HCLTech operations that fall under the direct operational control of the Company's Legal structure. Based on the agreed scope with the Company, the boundary of reasonable assurance covers the operations of HCLTech across all global locations, unless otherwise stated in the table below,

BRSR Core Attribute	Boundary for Reasonable Assurance
Attribute 4: Embracing circularity - details related to waste management by the entity	India Locations
Attribute 7: Enabling Inclusive Development	India Locations

Limited assurance of rest non-financial disclosures in BRSR: Boundary for limited assurance of rest non-financial disclosures in BRSR covers the operations of HCLTech across all global locations, unless otherwise specified in the report.

This boundary for limited assurance also applies to the BRSR Core attribute-related disclosures as mentioned in the table above and cross-references, except where the BRSR report explicitly specifies that certain disclosures are applicable only to India operations.

Reporting Criteria and Standards

The disclosures have been prepared by HCLTech in reference to:

- Industry Standard on Reporting of BRSR Core, Circular No.: SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177 dated Dec 20, 2024.
- BRSR Core (Annexure 17A) and BRSR reporting guidelines (Annexure 16) as per Master Circular No. HO/49/14/14(7)2025-CFD POD2/I/3762/2026, "Master circular for compliance with the provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 by listed entities", dated January 30, 2026.
- Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard.
- ISO 14064-1:2018 - Specification with guidance at the organization level for quantification and reporting of greenhouse gas emissions and removals.

Our competence, and Independence

DNV applies its own management standards and compliance policies for quality control, which are based on the principles enclosed within ISO/IEC 17029:2019- Conformity Assessment – General principles and requirements for validation and verification bodies and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements. DNV has complied with the Code of Conduct during the assurance engagement. DNV's established policies and procedures are designed to ensure that DNV, its personnel and, where applicable, others are subject to independence requirements (including personnel of other entities of DNV) and maintain independence where required by relevant ethical requirements.

This engagement work was carried out by an independent team of sustainability assurance professionals. During the reporting period i.e. FY26, DNV, to the best of its knowledge, was not involved in any non-audit/non-assurance work with the Company and its Group entities which could lead to any Conflict of Interest. DNV was not involved in the preparation of any statements or data included in the Report except for this Assurance Statement. DNV maintains complete impartiality toward stakeholders interviewed during the assurance process.

Assurance Methodology/Standard and Level of Assurance

This assurance engagement has been carried out in accordance with DNV's VeriSustain™ protocol, V6.0, which is based on our professional experience and international assurance practice, and the international standard in Assurance Engagements, ISAE 3000 (revised) - Assurance Engagements other than Audits or Reviews of Historical Financial Information. DNV's VeriSustain™ Protocol, V6.0 has been developed in accordance with the most widely accepted reporting and assurance standards. Apart from DNV's VeriSustain™ protocol (V6.0), DNV team has also followed ISO 14064-3 - *Specification with guidance for the verification and validation of greenhouse gas statements* to evaluate disclosures wrt. Greenhouse gases. DNV conducted Reasonable Level of assurance for BRSR Core KPIs under 9 ESG attributes; and Limited Level of assurance for rest non-financial disclosures in BRSR.

Basis of our conclusion

As part of our independent assurance engagement, we have evaluated the reported environmental, social, and governance (ESG) information against the agreed criteria. Throughout the engagement, we exercised rigorous professional judgment and maintained a high level of professional skepticism to ensure the integrity and reliability of our conclusions.

As part of the assurance process, a multi-disciplinary team of assurance specialists performed assurance work for selected sites of HCLTech. We carried out the following activities:

BRSR Core Indicators – Reasonable level of Assurance	Rest non-financial disclosures in BRSR – Limited Level of Assurance
Reviewed the disclosures under BRSR Core, encompassing the framework for assurance consisting of a set of Key Performance Indicators (KPIs) under 9 ESG attributes. The Industry Standard on Reporting of BRSR Core used a basis of reasonable level of assurance.	Reviewed the disclosures under BRSR reporting guidelines. Our focus included general disclosures, management processes, principle wise performance (essential indicators, and leadership indicators) and any other key metrics specified under the reporting framework. The BRSR reporting format used a basis of limited level of assurance.
Evaluation of the design and implementation of key systems, processes and controls for collecting, managing and reporting the BRSR Core indicators. Assessment of operational control and reporting boundaries.	Understanding the key systems, processes and controls for collecting, managing and reporting the non-financial disclosures in BRSR. Understand and test, on a sample basis to evaluate adherence to the reporting principles.
Seek extensive evidence across all relevant areas, ensuring a detailed examination of BRSR Core indicators. Engaged directly with stakeholders to gather insights and corroborative evidence for each disclosed indicator.	Collect and evaluate documentary evidence and management representations supporting adherence to the reporting principles. We adopted a risk-based approach, that is, we concentrated our assurance efforts on the issues of high material relevance to the Company's business and its key stakeholders.
DNV audit team conducted on-site audits for data testing and also, to assess the uniformity in reporting processes and also, quality checks at different locations of the Company. Sites for data testing and reporting system checks were selected based on the percentage contribution each site makes to the reported indicator, complexity of operations at each location (high/low/medium) and reporting system within the organization. Sites selected for audits are listed in Annexure II.	DNV audit team conducted on-site audits for corporate offices and sites. Sample based assessment of site-specific data disclosures was carried out. We were free to choose sites for conducting our assessment.

In both the cases, DNV teams conducted the:

- Interviews with selected senior managers responsible for management of disclosures and review of selected evidence to support environmental KPIs and metrics disclosed the Report. We were free to choose interviewees and interviewed those with overall responsibility of monitoring, data collation and reporting the selected indicators.
- Verification of the consolidated reported performance disclosures in context to the Principle of Completeness as per VeriSustain™ Protocol, V6.0 for both reasonable level and limited level of assurance for the disclosures.

Inherent Limitations

DNV's assurance engagement assume that the data and information provided by the Company to us as part of our review have been provided in good faith, is true, complete, sufficient, and authentic, and is free from material misstatements. The assurance scope has the following limitations:

- The assurance engagement considers an uncertainty of ±5% based on materiality threshold for estimation/measurement errors and omissions.
- DNV has not been involved in evaluation or assessment of any financial data/performance of the company. DNV opinion on specific BRSR Core Attribute 8 on "Number of days of accounts payable", Attribute 9 "Open-ness of business" and all sections of BRSR indicators where currency or INR has been applied relies on the third party audited financial reports of the Company. DNV does not take any responsibility of the financial data reported in the audited financial reports of the Company.
- The assessment is limited to data and information within the defined Reporting Period. Any data outside this period is not considered within the scope of assurance.
- Data outside the operations specified in the assurance boundary is excluded from the assurance, unless explicitly mentioned otherwise in this statement.
- The assurance does not cover the Company's statements that express opinions, claims, beliefs, aspirations, expectations, aims, or

future intentions. Additionally, assertions related to Intellectual Property Rights and other competitive issues are beyond the scope of this assurance.
- The assessment does not include a review of the Company's strategy or other related linkages expressed in the Report. These aspects are not within the scope of the assurance engagement.
- The assurance does not extend to mapping the Report with reporting frameworks other than those specifically mentioned. Any assessments or comparisons with frameworks beyond the specified ones are not considered in this engagement.
- Aspects of the Report that fall outside the mentioned scope and boundary are not subject to assurance. The assessment is limited to the defined parameters.
- The assurance engagement does not include a review of legal compliances. Compliance with legal requirements is not within the scope of this assurance, and the Company is responsible for ensuring adherence to relevant laws.

Responsibility of the Company

HCLTech has the sole responsibility for the preparation of the BRSR and is responsible for all information disclosed in the BRSR Core and BRSR. The company is responsible for maintaining processes and procedures for collecting, analyzing and reporting the information and also, ensuring the quality and consistency of the information presented in the Report. HCLTech is also responsible for ensuring the maintenance and integrity of its website and any referenced BRSR disclosures on their website.

DNV's Responsibility

In performing this assurance work, DNV's responsibility is to the Management of the Company; however, this statement represents our independent opinion and is intended to inform the outcome of the assurance to the stakeholders of the Company. DNV disclaims any liability or co-responsibility for any decision a person or entity would make based on this assurance statement.

Use and distribution of Assurance statement

This assurance statement, including our conclusion has been prepared solely for the exclusive use and benefit of management of the company and solely for the purpose for which it is provided. To the fullest extent permitted by law, DNV does not assume responsibility to anyone other than company for DNV's work or this assurance statement. We have not performed any work, and do not express any conclusion, on any other information that may be published outside of the Report and/or on Company's website for the current reporting period.

The use of this assurance statement shall be governed by the terms and conditions of the contract between DNV and the HCLTech. DNV does not accept any liability if this assurance statement is used for any purpose other than its intended use, nor does it accept liability to any third party in respect of this assurance statement.

For DNV Business Assurance India Private Limited,	
Chadha, Jas Sahib Singh — Digitally signed by Chadha, Jas Sahib Singh Date: 2026.06.26 16:14:49 +05'30'	Sharma, Anjana — Digitally signed by Sharma, Anjana Date: 2026.06.30 12:15:42 +05'30'
Jas Sahib Singh Chadha Lead Verifier	Anjana Sharma Assurance Reviewer
Assurance Team: Chandan Sarkar, R. Mohan Krishnan, Suraiya Rahman, Poornachander Maratha, Shilpa Swarnim, Thyagaraj Subbarayan	

26/06/2026, Bengaluru, India

Annexure I

1. BRSR Core Verified Data - Reasonable Level of Assurance

Stipulated as per BRSR Core provided by the company

Sr. No.	Attribute	BRSR Core Parameter	Unit	Verified Value for FY26
1	Green-house gas (GHG) footprint	Total Scope 1 emissions	MT of CO_2e	12,084.58
		Total Scope 2 emissions (Market-based)	MT of CO_2e	86,864.44
		Total Scope 1 and Scope 2 emission intensity per rupee of turnover	MT of CO_2e / Million ₹	0.076
		Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)	MT of CO_2e / Million USD adjusted for PPP	1.55
		Total Scope 1 and Scope 2 emission intensity in terms of physical output	MT of CO_2e / capita /annum	0.42
2	Water footprint	Total water consumption	KL	925,715.16
		Water consumption intensity	KL / Million ₹	0.71
			KL / Million USD adjusted for PPP	14.47
		Water intensity in terms of physical output	KL / capita /annum	3.90
		Water Discharge by destination and levels of Treatment	KL	19,135.25
3	Energy footprint	Total energy consumed	Gigajoules (GJ)	916,465.19
		% of energy consumed from renewable sources	In % terms	49.79%
		Energy intensity	GJ / Million ₹	0.70
			GJ / Million USD adjusted for PPP	14.32
			GJ / capita /annum	3.87
4	Embracing circularity - details related to waste management by the entity	Plastic waste (A)	MT	15.99
		E-waste (B)	MT	262.09
		Bio-medical waste (C)	MT	4.89
		Construction and demolition waste (D)	MT	111.05
		Battery waste (E)	MT	345.25
		Radioactive waste (F)	MT	0
		Other Hazardous Waste (G)	MT	18.25
		Other Non-Hazardous Waste (H)	MT	1,683.72
		Total (A+B + C + D + E + F + G+ H)	MT	2,441.23
		Waste intensity per rupee of turnover from operations	MT / Million ₹	0.0019
		Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)	MT / Million USD adjusted for PPP	0.038
		Waste intensity in terms of physical output	MT / capita /annum	0.010
		Total waste recovered through recycling, re-using or other recovery operations		
		(i) Recycled	MT	1,763.43
		(ii) Re-used	MT	0
		(iii) Other recovery operations	MT	270.90
		Total	MT	2,034.33
		Intensity (Waste Recycled Recovered / Total Waste generated)	%	83.33%
		Total waste disposed by nature of disposal method		
		(i) Incineration	MT	9.41
		(ii) Landfilling	MT	0
		(iii) Other disposal operations	MT	0
		Total	MT	9.41
		Intensity (Waste Disposed / Total Waste generated)	%	0.39%
5	Enhancing Employee Wellbeing and Safety	Spending on measures towards well-being of employees and workers – cost incurred as a % of total revenue of the company (Excluding Workers)	In % terms	2.08%
		Details of safety-related incidents for employees and workers (including contract-workforce e.g. workers in the company's construction sites)	Number of Permanent Disabilities	0
			Total recordable work-related injuries	34
			Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	0.00659
			No. of fatalities	0
6	Enabling Gender Diversity in Business	Gross wages paid to females as % of wages paid	In % terms	20.74%
		Complaints on PoSH	Total Complaints on Sexual Harassment (POSH) reported	31
			Complaints on PoSH as a % of female employees / workers	0.06%
			Complaints on PoSH upheld	20
7	Enabling Inclusive Development	Input material sourced from following sources as % of total purchases and from within India	Directly sourced from MSMEs/ small producers	12%
			Sourced directly from within India	90%

		Job creation in smaller towns – Wages paid to persons employed in smaller towns (permanent or non-permanent /on contract) as % of total wage cost	Location	
			Rural	0%
			Semi-urban	0%
			Urban	26.72%
			Metropolitan	73.28%
8	Fairness in Engaging with Customers and Suppliers	Instances involving loss / breach of data of customers as a percentage of total data breaches or cyber security events	In % terms	0.00%
		Number of days of accounts payable	(Accounts payable *365) / Cost of goods/services procured	46.5
9	Open-ness of business	Concentration of purchases & sales done with trading houses, dealers, and related parties Loans and advances & investments with related parties	Purchases from trading houses as % of total purchases	Not Applicable
			Number of trading houses where purchases are made from	Not Applicable
			Purchases from top 10 trading houses as % of total purchases from trading houses	Not Applicable
			Sales to dealers / distributors as % of total sales	3.81%
			Number of dealers / distributors to whom sales are made	1406
			Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	30.19%
			Share of RPTs (as respective %age) in	
			Purchases	0.16%
			Sales	0.02%
			Loans & advances	0.00%
			Investments	0.00%

2. BRSR Disclosures - Limited level of Assurance

- Section A: General Disclosures- 20-a, b, 21, 22, 25
- Section C: Principle Wise Performance Disclosures -

- Principle 1: Essential Indicator 1; Leadership Indicator 1
- Principle 3: Essential Indicator 1-a, b, 2, 5, 7, 8, 9, 13, 14; Leadership Indicator 3, 5
- Principle 5: Essential Indicator 1, 2, 6, 10; Leadership Indicator 4
- Principle 6: Essential Indicator 6; Leadership Indicator 1, 2, 7
- Principle 8: Leadership Indicator 2, 3, 6
- Principle 9: Essential Indicator 3

Annexure II – Sites selected for audits

S.no	Site	Location
1.	Corporate Office	NCR-Campus, Noida
2.	India Sites (onsite)	NCR-Campus, Noida; Chennai-Elcot Campus; Bengaluru-Jigani Campus
3.	India Sites (remote audit)	Hyderabad, Madurai, Nagpur, Pune
4.	International Sites (remote audit)	Australia; Canada-Mississauga, Vancouver; Mexico-Minerva, Andares Campus; Sweden-Göteborg ARDH; Italy-Emanuelli, Portion B, Ericsson Vimodron; Sri Lanka-Colombo; USA-Frisco, Parsippany, Santa Clara; UK-HCL House