



HCLTech Sustainability

Climate Change, Net-Zero and Energy Transition

Decarbonization at Planet Pace

- GRI 3-3 GRI 305 GRI 302
- GRI 201-2 GRI 2-13 GRI 2-24
- ESRS E1 IFRS S2

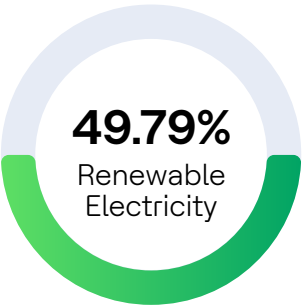


Climate change is one of the defining challenges and opportunities of our time. At HCLTech, we are advancing a low-carbon future through bold ambition and disciplined execution. In FY26, we achieved our 2030 Scope 1 and Scope 2 emissions reduction targets four years ahead of schedule, expanded renewable energy to 49.79% of total energy consumption and enabled 89.65% renewable energy use across our data centers. We also secured SBTi validation of our short- and long-term climate targets, joining a select group of global IT companies with science-aligned net-zero pathways, while reducing our energy footprint by 31% from the FY20 baseline. These achievements demonstrate the scale, credibility and momentum of our sustainability journey.

Inside our operations
↓55.84%
Combined Scope 1+2 vs FY20 baseline. 2030 SBTi target achieved four years early

49.79%
of our global electricity consumption is from renewable sources

FY26 Highlights



↓55.84%
Scope 1+2 vs FY20

↓31%
Total energy consumption vs FY20

↓27.7%
Total Footprint Scope 1+2+3 vs FY20

14.32
Energy Intensity GJ/million \$ PPP adjusted

456,328 GJ RE globally	10,885 GJ On-site solar generated in FY26
Net Zero by 2040 SBTi validated	22 Countries mapped (RCP + SSP)
308 Value Chain Assessed (76.4% of spend)	\$16/tCO_{2e} Internal Carbon Price
CDP Supplier Engagement "A"	89.65% RE in data centers

Our Climate Ambition

Our climate ambition rests on four interlocking commitments: decarbonize our own operations, clean our electricity supply, engage our value chain and build resilience against a warming world. Each is reinforced by an internal carbon price and integrated into capital allocation decisions.

Our Public Commitments

Commitments	FY26 Status	Progress against target
Net Zero across the value chain by 2040	413,360.14 tCO ₂ e (–27.70%)	Long term pathway active
50% absolute reduction in Scope 1+2 by 2030 (SBTi)	98,949.02 tCO ₂ e (–55.84%)	Achieved four years early
42% absolute reduction in Scope 3 by 2030 (SBTi)	314,411.11 tCO ₂ e (–9.56%)	In progress
80% renewable electricity by 2030	49.79%	In progress
70% electric transport fleet for employees by FY30	EV trips at 75%–80% of daily commute at flagship India campuses	In progress
100% Zero Waste to Landfill at owned India campuses	Platinum certificate at all owned India campuses	Achieved in FY25 and sustained in FY26

The drivers behind our climate ambition

Five drivers translate ambition into operating reality; each owned at executive level:

- Integrating climate into our core strategy
- Reducing emissions across our operations and value chain
- Accelerating renewable energy adoption
- Strengthening climate risk and resilience planning
- Enabling climate solutions for clients

22 Geographies across the value chain

Screened under RCP2.6, RCP4.5 and RCP 8.5 across 2030, 2040 and 2050 horizons.

Climate response

Climate governance, the Board’s ESG and DEI Committee oversight as well as the management accountability framework are set out in our Environmental Management System charter. This section covers the three remaining pillars of our TCFD aligned climate response: **Strategy, Risk Management and Metrics and Targets.**

Climate Strategy

In line with IFRS S2 and the TCFD recommendations, we assess our climate-related risks across three climate scenarios spanning the IPCC RCP and SSP range, over short-term (2030) and long-term (2050)

horizons. Physical risks are scored at site level and transition risks by a driver, on a common five-point severity scale (1 very low to 5 very high). Each scenario pairs an emissions pathway with its corresponding policy response. The full severity heat map is provided in the annexure.

Physical and transition risks trade off across these pathways. An orderly 1.5°C transition (RCP 2.6) minimizes physical risk but brings the greatest transition pressure, while a failed transition (4°C+, RCP 8.5) reverses the balance. Assessing all three pathways, including the ambitious 1.5°C pathway, ensures the transition risk is fully represented rather than understated.

Physical risk falls, transition risk rises across the three pathways

Risk (Type)	1.5°C pathway RCP 2.6 · NZE	~2.5°C pathway RCP 4.5 · SSP2	4°C+ pathway RCP 8.5 · SSP5
Physical risk	Low	Medium	High
Transition risk	High	Medium	Low

Each column pairs an emissions pathway with its matching policy response.

Climate Opportunities – turning Risk into Revenue

Our climate strategy is also generating new commercial pathways. We are scaling client demand for:

- **DecarbonizIT** – a green lens platform giving real-time visibility into the environmental impact of client IT infrastructure.
- **AI-powered ESG Data Optimization**– a solution automating client sustainability data collection and accelerating disclosure cycles.
- **Net Zero Intelligent Operations (NIO)** – an enterprise-wide solution for monitoring and reducing client energy, water, waste and GHG footprints.

- **SF360 with PCAF alignment** – a platform supporting financial institutions to measure Scope 3 Category 15, which often represents 85% or more of their total footprint.
- **AquaSphere and Sustainable IT** – solutions enabling clients to act on water and IT sustainability at scale.

Financial Implications

Transition risks have a measurable financial signature: rising electricity costs, evolving carbon pricing, escalating compliance cost and shifting client procurement criteria. Physical

risks add to operating costs through higher cooling demand, increasing water procurement and escalating business continuity expenditure. We quantify these exposures and embed them in our investment decisions through the \$16 per tCO₂e internal carbon price.

Climate Risk Management

Processes for identifying climate risks: We map physical and transition risks at asset-level granularity across 22 geographies of operational significance, using a four-tool framework: Climate Impact Explorer and ThinkHazard for physical hazard exposure; the WWF Water Risk Filter and WRI Aqueduct for water stress; and the IPCC AR6 SSP dataset for transition pathways. Each risk is scored on a 1 (very low) to 5 (very high) scale and recorded against site, business unit and value chain category.

Processes for assessing climate risks: Each identified risk is assessed for likelihood, materiality and time horizon. Material risks are incorporated into HCLTech’s Enterprise Risk

Management framework, where climate sits alongside strategic, financial, operational, cyber and governance risks. The ERM framework identifies 12 material topics with associated risks, opportunities, mitigation strategies and financial impacts, all approved by the Board, with quarterly exposure reviews.

Integration into enterprise risk: Material climate risks are owned by named executives and tracked through quarterly Risk and Compliance Apex Committee reviews that feed the Audit and Risk Management Committee of the Board. Climate is also embedded into HCLTech’s internal audit program.

Geographies assessed: Chronic and acute physical risks have been scored across all material operating geographies, including India, Sri Lanka, the United States, Australia, Bulgaria, Canada, the Czech Republic, France, Germany, Guatemala, Hungary, Italy, Mexico, the Netherlands, the Philippines, Poland, Romania, Spain, Sweden, Switzerland and the United Kingdom.

Physical risks and our response

Risk (Type)	Description and exposure	Actions implemented in FY26
Water scarcity (chronic)	Cooling infrastructure is water-intensive. Sixteen India locations including Bengaluru, Chennai, Hyderabad, Lucknow, Madurai, Nagpur, Noida, Pune and Vijayawada operate in water stressed geographies	Rainwater harvesting; MBR and MBBR sewage treatment for cooling and landscaping reuse; condensate recovery; atmospheric water generation pilots. In FY26, the HCLFoundation replenished 51x the water we consumed across India operations
Extreme heat (chronic)	Rising cooling load, data center reliability risk and workforce well-being impact	Magnetic chillers; cooling tower upgrades with FRP and flash fills; EC fan AHU retrofits; PUE reduction program; heat-resilient design across 13.80 million sq. ft. of green-certified space

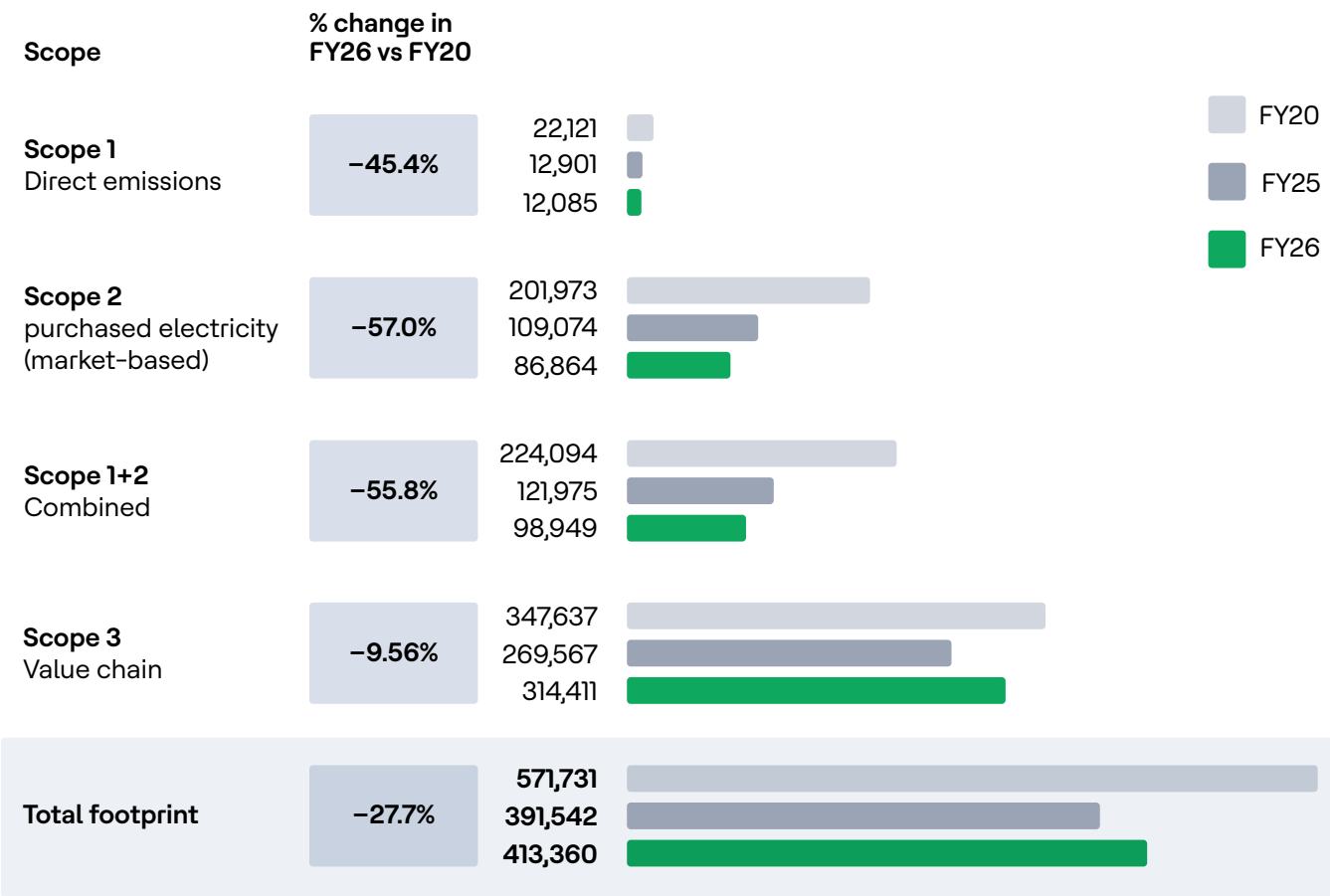
Risk (Type)	Description and exposure	Actions implemented in FY26
Flooding and extreme rainfall (acute)	Disruption risk at coastal and monsoon-exposed campuses; infrastructure damage and supply chain interruption risk	Elevated infrastructure in flood-prone zones; campus drainage upgrades; routine vulnerability assessments; BCP and DRP rehearsals; real-time weather monitoring; flexible working arrangements
Cyclones (acute)	Episodic risk at Chennai and Sri Lanka operations; potential for building damage, power outage and delivery delay	Structural reinforcement at coastal facilities; alternative power source contingency; staff safety protocols; early warning systems

Transition Risks and our Response

Risk (Driver)	Description	Actions implemented in FY26
Carbon pricing and carbon taxes (policy)	Global carbon pricing policies raise operating costs for energy-intensive sectors, including data centers	Internal carbon price of \$16 per tCO ₂ e applied ex post to actual abatement; capital allocation to HVAC, chiller, UPS and lighting upgrades; on-site solar.
Regulatory compliance (policy)	Risk of fines, penalties and disqualification from public tenders for non-compliance with evolving climate regulations	ISO 14001:2015 certification across owned campuses; annual third-party audits; compliance tracking across jurisdictions
Technology shift (technology)	Risk of being outpaced by lower carbon competitors in data center design, low-carbon mobility and AI-driven optimization	Investment in energy-efficient data centers, smart building systems, IoT-enabled monitoring, AI for energy optimization; partnerships with renewable energy suppliers
Rising electricity costs (market)	Grid tariff volatility in India and EU markets affect operating expenditure	Long-term PPAs for Noida and Lucknow via the equity-backed Open Access Group Captive model; on-site solar at Vijayawada, Bengaluru and Madurai
Changing client preferences (market)	Clients increasingly select providers with credible climate commitments	Net Zero target alignment with major clients; R&D investment in sustainability solutions; DecarboniziT, ESG Data Optimization, AquaSphere, NIO
Stakeholder expectations (reputation)	Investors, regulators and rating agencies demand credible, externally-assured climate disclosure	DNV reasonable assurance on BRSR Core; CDP “A” rating for Supplier Engagement; disclosures aligned with TCFD, IFRS S2 and ESRs E1

Climate performance - against baseline

Greenhouse gas emissions, (tCO₂e)



Scope 3 - where the harder work sits

Scope 3 rose 16.64% year over year in FY26. Two categories account for almost all of the increase:

- Purchased goods and services and capital goods - driven by planned infrastructure refresh and campus improvement works.
- Employee commuting - reflecting higher return-to-office attendance in India.

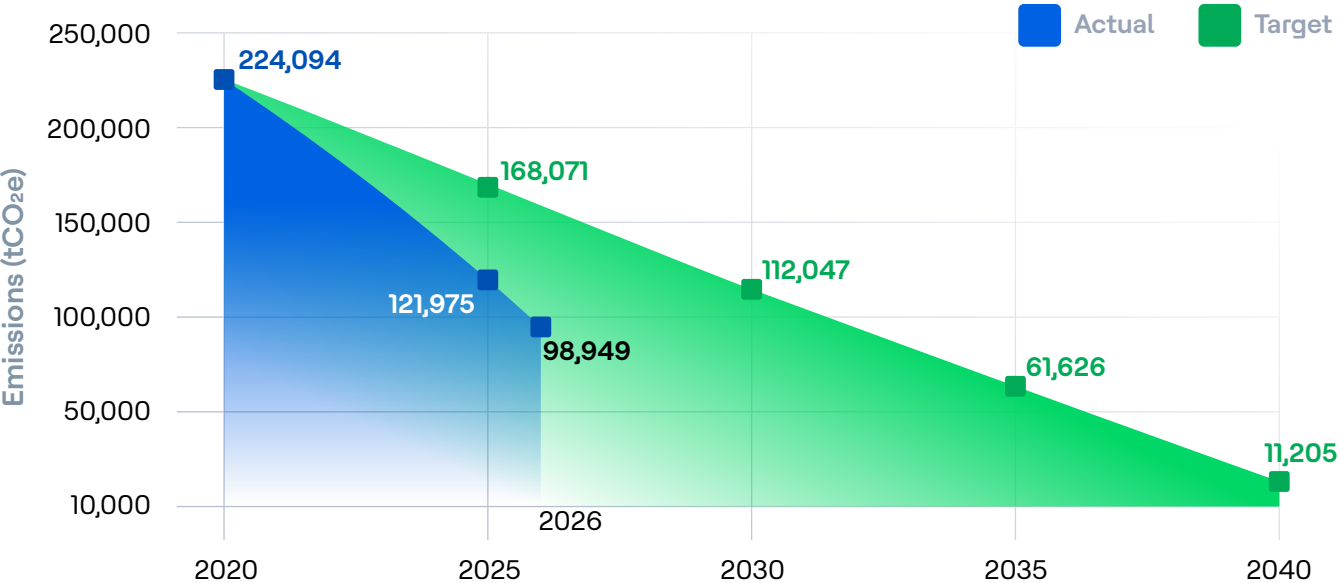
Together, business travel and employee commuting account for approximately 82% of our Scope 3 footprint. The remaining 18% is concentrated in purchased and capital goods. Categories 8, 10, 11, 12, 14 and 15 are excluded as not applicable to a services business; the rationale is set out in our methodology note.

The full category split is reported in our ESG Performance Metrics.

We are responding on three fronts:

- **Electric transport for employees at scale:** Hyderabad runs 165 EVs at 80% of daily trips; Bengaluru runs 103 EVs at 31% of daily trips. Combined avoidance in FY26: 934.30 tCO₂e.
- **Supplier engagement:** 308 value chain partners (76.4% of partner spend) assessed for environmental performance, supported by our CDP "A" rating for Supplier Engagement.
- **Capital procurement model refresh:** Moving to product-level emission factors as they become available.

Net Zero pathway: Progress so far



Energy

Energy is a critical strategic input, forming the foundation for reliable digital infrastructure and the primary driver of Scope 2 emissions. HCLTech addresses energy as both an efficiency priority and a resilience strategy - focused on reducing demand, expanding renewable sourcing and enhancing system performance. In FY26 we consumed 450,752 GJ (125,209 MWh)

of renewable electricity globally: 251,626 GJ (69,896 MWh) in India and 204,700 GJ (56,861 MWh) internationally. On-site solar generated 10,885 GJ (3,023.6 MWh) during the year. Total energy intensity is down approximately 31% against FY20. Renewable energy accounted for 49.79% of total energy consumption in FY26, supported by PPAs and an equity investment under an Open Access - Group Captive model.

Total energy consumption and mix (GJ)



Data center performance and PUE

Metric	FY26	FY25	FY24
Average PUE	1.57	1.57	1.59
Renewable share in data centers (%)	89.65	88.81	85.51
FY26 PUE target	1.46	1.48	1.60

Decarbonization initiatives delivered in FY26

Initiative	Energy saved (GJ)	Emissions avoided(tCO ₂ e)
Chiller plant performance improvement	1,166	230
HVAC low side retrofits (EC fans, VRF)	3,085	608
Energy efficient lighting and controls	630	124
Technology adoption (AHU, HVLS, VFD, SBR)	3,877	765
UPS optimization	2,066	408
Total	10,824	2,135

Refrigerant transition

We continue to phase out high GWP refrigerants. Our campus in Chennai Sholinganallur has transitioned from FM200 to NOVEC (GWP of 1). Refrigerant top-up remains the largest Scope 1 source and is a priority for the FY27 retrofit program.

Methodology

Our greenhouse gas inventory is prepared in accordance with the GHG Protocol Corporate Standard and ISO 14064-1:2018, using an operational control consolidation approach. Base year is FY20. Independent assurance is

provided by DNV Business Assurance India Private Limited under DNV VeriSustain Protocol V6.0, ISAE 3000 (revised) and ISO 14064-3.

- **Emission factors:** DEFRA 2025 UK Government GHG Conversion Factors; IPCC Sixth Assessment Report; Central Electricity Authority of India CO₂ Baseline Database v21 (0.710 tCO₂e/MWh for the Indian grid); IGES Grid Emission Factors and AIB 2024 European Residual Mixes for international electricity; US EPA 2024 for capital goods and services (spend based EEIO); EPA Fugitive Emission factors for refrigerants.

- **Scope 3 exclusions with rationale:** Categories 4, 8–15 are not applicable to the nature of HCLTech’s business operations.

Looking ahead

HCLTech tested the climate strategy and confirmed its direction throughout FY26. We closed the gap to our 2030 Scope 1+2 target faster than our planned trajectory and we learned that a higher return-to-office rate of employees impacted our Scope 3 footprint across a few categories that demand a different mitigation strategy.

Our future priorities are clear:

- **Refresh supplier engagement** for product-level emission factors
- **Expand electric transport for employees** to Pune and Chennai locations
- **Continue the renewable build-out** toward 80% by 2030

Our climate response priority areas get attention at the highest executive level as we outline a time-bound response mechanism to address evolving challenges. This ensures that we remain operationally resilient and continue to deliver sustainable growth.



Eco-Efficiency and Responsible Resource Management

HCLTech maintained industry leadership in water with the lowest water consumption at 10.68 liters per capita per day and set a new benchmark in water leadership globally by replenishing 51 times more water than our own consumption, totaling 47.57 billion liters replenished in FY26.

We also maintained industry leadership in waste management since FY25 by retaining the Zero Waste to Landfill Platinum certification in 100% campuses, with the highest level of waste diverted at 99%.



Green Building Portfolio

Our green building program forms the operational backbone of HCLTech’s water and waste management performance. In FY26, 13.80 million square feet of building space were certified under leading global green building standards, including LEED, IGBC, BREEAM, CASBEE, NABERS, Green Star, EDGE and TRUE, with 11.20 million square feet of owned facilities achieving the highest Platinum-level certification.

Sustainability considerations are also increasingly shaping leasing decisions, with 35.14% of the leased portfolio, representing 2.59 million square feet, certified by recognized Green Building Councils. These certified spaces support measurable improvements in energy and water efficiency, zero-waste performance and operational emissions reduction, reinforcing HCLTech’s commitment to building resilient, resource-efficient workplaces.

Water Stewardship

A two-pronged strategy: within the fence, beyond the fence

Our water stewardship is built on two parallel commitments that work in tandem.

- **Within the fence, operational excellence:** Across our owned campuses, we run one of the most water-efficient operating models in global IT services. Every liter is metered, monitored and reused. We treat all our wastewater on site, recycle it for cooling, flushing and landscaping and have removed our dependence on municipal discharge wherever feasible. This results in a per capita water consumption of 10.68 liters per day.
- **Beyond the fence, community replenishment:** Through the HCLFoundation, we work alongside rural communities across India’s most water-stressed districts to revive ponds, restore catchments and harvest rainwater. The 433 structures under our care harvested 47.57 billion liters of water in FY26, replenishing 51x what HCLTech consumed across its entire global footprint.

Within the fence: operational water stewardship

Sixteen of our India locations, including Bengaluru, Chennai, Hyderabad, Lucknow, Madurai, Nagpur, Noida and Pune, operate in water-stressed geographies. Each of these sites runs under a tightly engineered water management model designed to reduce withdrawal of water, maximize reuse and protect the watershed in which it sits.

Consumption rose modestly in FY26 on the back of two planned shifts: a higher office attendance in India, with the number of employees working from offices in India increasing to 52,109 in FY26 compared to 49,672 in FY25 and a wider reporting boundary that now covers 90% of international locations and all data centers. Even after that expansion,

Operational excellence

10.68L
per capita
per day lowest
in our industry

Zero
water discharged
without treatment

95%
sewage
recycled

28.50M
liters saved

Community replenishment

51x
replenished
vs used

47.57B liters
rainwater

433
water credit
structures

75
new structures

3.5M+
saplings planted till date

our per capita per day water consumption of 10.68 liters remains among the lowest reported in our industry, a result of years of engineering discipline at the site level.

In the 16 water-stressed locations, we withdrew 828,094 KL and consumed 811,018 KL in FY26, reflecting the disciplined effect of conservation measures at our most sensitive sites.

To promote responsible water use, HCLTech conducts round-the-year employee awareness and engagement initiatives across its campuses, including digital campaigns, educational displays in common areas. These initiatives encourage employees to adopt water-efficient behaviors and identify opportunities to reduce consumption.

Parameter	FY26	FY25
Total water withdrawal (KL)	944,850.42	849,928.34
Total water consumption (KL)	925,715.16	834,013.09
Groundwater withdrawal (KL)	167,442.15	261,965.02
Third party water (KL)	647,256.88	332,476.36
Rainwater, AWG and AHU condensation (KL)	130,151.39	255,486.96
Water discharged to third parties (KL)*	19,135.25	15,915.25
Water consumption per capita per day (liters)	10.68	9.75
Water intensity (KL per capita per annum)	3.90	3.56

* Relates to a single facility connected to a shared/common STP; all other owned campuses operate Zero Liquid Discharge with full on-site treatment and reuse.

Zero Liquid Discharge

We operate with zero liquid discharge across applicable facilities, where every drop of wastewater generated is treated through onsite sewage treatment plants and processed for reuse in cooling, flushing and landscaping. Residual solids are managed through authorized disposal channels. The outcome: no wastewater is discharged outside our premises and approximately 95% of sewage water is recycled through on-campus treatment.

Engineering-led conservation

In FY26, targeted conservation initiatives resulted in 28.50 million liters of water savings. The program is built around five operational innovations:

- **Scale bio removal with deionization in cooling towers:** This reduces water consumption in the cooling cycle while preserving system efficiency.
- **Sensor-based water farming system at our Madurai campus:** This automates drip irrigation controlled by soil moisture sensors, using treated STP water and releasing water only when soil chemistry demands it.

- **Automated sand filter operations at our Madurai campus:** Motor-operated valves on STP and WTP sand filtration cuts manual effort by 20% to 30%, increasing recycled water availability by approximately 3%.
- **Cooling tower automation at the Madurai campus:** Wet bulb temperature and entering water temperature sensors calculate enthalpy and intelligently regulate cooling tower fan operations through variable frequency drives.
- **Real-time water quality monitoring:** IoT-enabled sensors enable continuous monitoring of pH, TDS and hardness across critical loops with automated alerts and trend analysis.

Water risk assessment

We conduct regular water risk assessments across all locations using the WRI Aqueduct Water Risk Atlas, aligned with the CDP Water Security Disclosure framework. At stressed sites, this drives a clear set of mitigation actions shifting from groundwater extraction to municipal sourcing, installing rainwater harvesting systems and deploying advanced STP technologies (MBR and MBBR) that enable high-quality reuse for cooling and landscaping.

Beyond the fence: Community water replenishment

The bigger story of our water stewardship sits outside our boundary walls. Through the HCLFoundation, we work in some of India’s most water-stressed rural geographies, restoring the watersheds that communities and ecosystems depend on. This is where the 51x replenishment ratio is shaped.

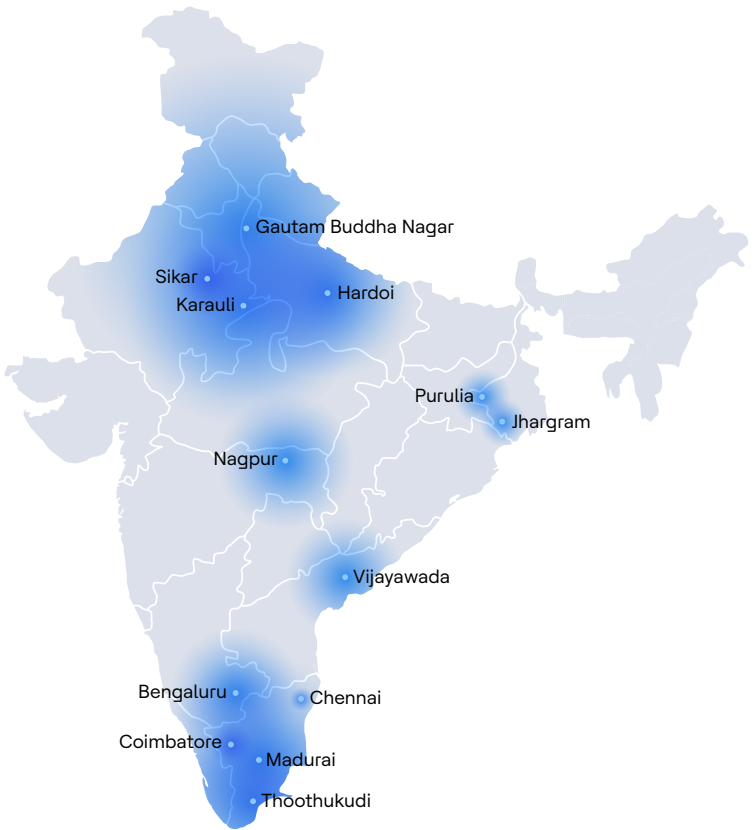
What we do and where

In FY26, the HCLFoundation operated 433 water credit structures in 13 districts spread over seven states of India: Karauli and Sikar in Rajasthan; Gautam Buddha Nagar and Hardoi in Uttar Pradesh; Bengaluru in Karnataka; Vijayawada in Andhra Pradesh; Coimbatore, Chennai, Madurai and Thoothukudi in Tamil Nadu; Purulia and Jhargram in West Bengal; and Nagpur in Maharashtra. Seventy-five new structures were added during the year.

Locations	Water credit (KL) FY26
Gautam Buddha Nagar (including Clean City)	19,557,413
Karauli	17,980,952
Madurai	6,410,720
Thoothukudi	997,593
Hardoi	958,873
Nagpur	780,892
Bengaluru	385,725
Vijayawada	211,833
Sikar	104,570
West Bengal (Purulia, Jhargram)	89,574
Coimbatore	80,516
Chennai	11,725
Grand total	47,570,386

The conservation and restoration initiatives in these structures have been carefully planned based on the requirement of each region. Some of the measures implemented:

- **Desilting of ponds, pokhars and anicuts** to restore the storage and percolation capacity of these traditional village water bodies.
- **Building rooftop rainwater harvesting infrastructure and recharge pits** for capturing direct rainfall at the point of use.
- **Developing storage ponds** for building seasonal buffers in catchments with high monsoon variability.
- **Removal of Prosopis juliflora from inside structures** to eliminate the invasive species whose evapotranspiration draws down stored water; verified using NDVI, the Normalised Difference Vegetation Index.
- **Maintenance of legacy structures** to restore the water-holding capacity of existing village assets year on year.



FY26 outcome, independently verified

DNV Business Assurance independently verified our FY26 water credit data against HCLFoundation’s standard operating procedure for rainwater harvesting calculation and verification. The verified result: Against HCLTech’s FY26 operational consumption of 925,715 KL, this represents a replenishment rate of 51 times.

Catchment-level restoration

Replenishment is supported by long-term land restoration. Across the catchment areas that surround our intervention sites, HCLFoundation has planted over 3.5 million saplings, restoring native species, regenerating grasslands and stabilizing soil and groundwater regimes.

Collective action at the basin level

We also act at the basin level. We are a signatory to the UN Global Compact CEO Water Mandate and an active member of the Water Resilience Coalition. In the Yamuna River Basin,

HCLTech partners with local authorities and solution providers to intercept debris before it reaches the river, preventing approximately 15 tons of debris from entering the river every month. HCL Group’s water innovation programs, such as Aquapreneur, further extend our role as a catalyst for scalable water solutions.

Why this matters

Water is a local resource governed by global pressure. Running an efficient operation matters; restoring the ecosystems we draw from matters even more. By holding ourselves to both standards — low per capita consumption inside our grounds and large-scale community replenishment beyond — we are setting a benchmark that is both credible and replicable.

In FY27, we will deepen this dual-track approach with more sensor-based automation across campuses, more water credit structures in stressed districts and a tighter integration of operational and community data into a single watershed-level account.

Aquapreneurs: Turning Water Risk into Scalable Innovation

Water is a key driver of resilience and long-term value. Through Aquapreneurs and the World Economic Forum’s UpLink platform, HCL Group accelerates early-stage innovations that advance water measurement, management and reuse.

Program snapshot

- **CHF 15 million (~\$17 million)** HCL Group commitment over five years starting 2022
- **40 Aquapreneurs** supported in the first four years
- 2025 marked the Initiative’s strongest funding year to date, with Aquapreneurs raising over **\$55 million**.
- Collectively, the portfolio has now raised more than **\$127 million**

Demonstrated innovation impact

- HCLTech collaborated with **SmartTerra** to launch **AquaSphere** through its Aquapreneur engagement program.
- **FieldFactors** expanded into Spain and Mexico and

launched a water replenishment partnership with Microsoft in Madrid.

- **Membrion** secured over **\$40 million** in funding and deployed its technology with **Fortune 500** companies through an UpLink-enabled Ecolab partnership.
- **SHAYP** moved from UpLink-facilitated introductions to contracts with Microsoft, Google and 625 schools across Europe.
- **Kilimo** advanced its AWS partnership, delivering measurable water replenishment benefits through data-driven agricultural efficiency.

Expanding scope

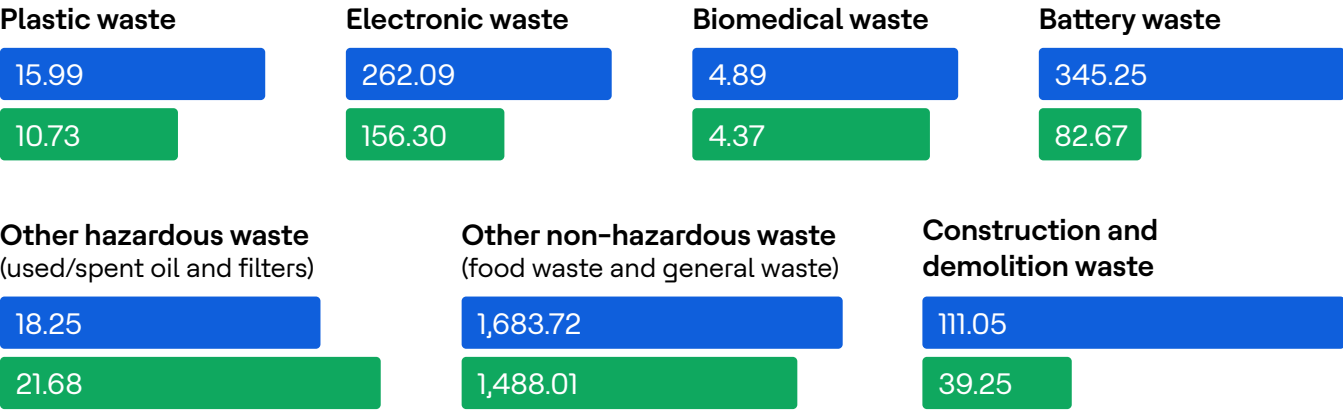
- Launch of the Water Resilience Challenge
- Focus areas: Groundbreaking AI solutions to transform water systems, reducing dependence on freshwater in critical industries, securing water supply reliability.

Waste Management Programs

- HCLTech continues to maintain its leadership in waste management through structured processes, innovation and employee engagement:
- **Systematic identification of improvement opportunities:** Waste management performance is periodically assessed across campuses to identify opportunities for improving segregation efficiency, enhancing recovery rates and reducing waste generation at source. Insights from these assessments inform targeted interventions across operational processes and infrastructure.
 - **Innovation-driven waste reduction:** We continue to embed innovation in waste management by adopting circular solutions and eliminating waste at source, such as transitioning to battery-free systems, repurposing materials within campus operations and scaling solutions that reduce dependency on single-use or high-waste inputs.
 - **Embedding responsible waste behaviours:** Waste reduction is supported through employee awareness initiatives that promote segregation at source, responsible consumption and participation in circular practices, ensuring that operational systems are reinforced by day-to-day behavioral change.

Waste performance

In metric tons



Zero Waste to Landfill: Platinum certification

Building on the FY25 milestone where all HCLTech-owned campuses in India achieved Zero Waste to Landfill Platinum Certification, the company continued to maintain best-in-class performance in FY26, with over 99% waste diversion across key locations, including Noida, Chennai, Bengaluru, Lucknow, Vijayawada, Madurai and Nagpur, well above the conventional diversion threshold of 90%. This consistent outperformance reflects robust segregation, recycling, reuse and recovery practices that advance circularity while enhancing operational efficiency, optimizing costs and reinforcing stakeholder confidence.

Waste performance

Total waste generation increased year-on-year, primarily due to planned operational activities undertaken during the reporting period. Battery waste rose following the scheduled replacement of end-of-life UPS systems across campuses to strengthen power resilience and infrastructure reliability. Construction and demolition waste also increased as a result of campus enhancement and facility modernization initiatives, including accessibility upgrades for persons with disabilities. These increases reflect planned infrastructure and operational improvement cycles rather than a structural rise in ongoing waste generation

Waste recovery and disposal

Of the 2,441 metric tons of total waste generated in FY26, 2,034 metric tons (over 83%) were recovered through recycling and other recovery operations. Only 9.41 metric tonnes were disposed of through incineration and zero waste was sent to landfill. This performance underpins our Zero Waste Platinum certification and reflects the operational rigor of our waste management system.



Recovery / disposal method*	FY26 (metric tons)	FY25 (metric tons)
Recycled	1,763.43	1,660.28
Other recovery operations	270.90	-
Total waste recovered	2,034.33	1,660.28
Incineration	9.41	9.17
Landfilling	0.00	0.00
Total waste disposed	9.41	9.17

*Total waste generated in a year may exceed the sum recovered and disposed in that year, with the balance carried forward for authorized disposal in a following period.

Circular economy in practice

Circular economy principles are embedded across our campus operations, transforming waste streams into productive resources. In FY26, our campuses advanced several initiatives that exemplify this commitment:

- Podium crafted from repurposed wood waste, giving new life to surplus timber while reducing landfill contribution and the demand for virgin wood
- Eco-friendly cocopeat derived from coconut husks, a renewable biodegradable alternative to peat moss that improves soil aeration and water retention
- Planters crafted from overgrown bamboo shoots, utilizing a rapidly renewable resource and managing uncontrolled bamboo growth while promoting sustainable design
- Waste coffee grounds repurposed for gardening and landscaping, collected and

- processed as a natural soil enhancer and diverting organic waste from landfills
- Reuse of used milk packets for plant nurturing, creatively repurposed as seedling containers and promoting single-use plastic diversion through circular reuse



Podium crafted from repurposed wood waste

Resource use and asset lifecycle

At HCLTech, every resource entering our operations — from IT hardware and facility materials to operational consumables and water — is managed with a clear focus on efficiency, resilience and circularity. As pressure on critical materials continues to grow globally, we are working to reduce dependence on virgin resources, minimize waste and build more sustainable supply chains that can support long-term growth responsibly.

Our approach to resource outflows reflects the same commitment to stewardship and accountability. Through secure lifecycle management and circular practices embedded across our services and operations, we prioritize data security, responsible treatment and measurable environmental outcomes. This includes extending asset life through reuse and refurbishment, ensuring secure asset disposition aligned with information security standards and partnering with authorized recyclers to recover value from end-of-life assets responsibly.

Electronic waste and responsible disposal

As a technology company, HCLTech recognizes electronic waste as one of its most material waste streams and is strengthening efforts to manage it responsibly through circular lifecycle practices and authorised recycling channels. In FY26, 262.09 metric tonnes of e-waste were processed through CPCB authorised recyclers with full traceability, reflecting a continued focus on responsible recovery and disposal. In addition, the Company manages e-waste in line with the principles of the WEEE Directive, RoHS Directive, Basel Convention E-waste Amendments and R2 Standard.

Our approach is built on a single principle: the most responsible e-waste is the e-waste we never generate. We therefore manage IT hardware as a lifecycle, not a transaction, extending useful life, recovering value from

every component and routing only genuine end of life material into authorised recycling channels.

Our e-waste management framework

HCLTech’s e-waste management program rests on five interlocking initiatives that span the hardware lifecycle from procurement to disposition.

- **Eco friendly IT procurement:** Sustainability begins at the point of purchase. HCLTech is engaged in ongoing discussions with the procurement team to source ENERGY STAR and EPEAT certified hardware, which reduces environmental impact and energy consumption while guaranteeing lower manufacturing waste and operational energy use. Choosing certified hardware at the front of the lifecycle locks in efficiency gains and downstream recyclability for the years that follow.
- **Hardware asset disposition:** Where assets reach genuine end of life, HCLTech works with certified vendors authorised by the Central Pollution Control Board of India (CPCB) and the National Institute of Standards and Technology (NIST) for secure e-waste handling. Every disposition is documented and tracked in accordance with all federal, state and local environmental regulations, providing a complete chain of custody from collection through final processing.
- **Asset life extension:** HCLTech follows defined lifecycle guidelines, typically four to five years for end user computing devices and seven to ten years for domain infrastructure and prioritises energy efficient hardware to extend usability responsibly. Where feasible, components from retired assets are cannibalised to keep functioning equipment in service for longer, deferring replacement spend and avoiding premature e-waste generation.

- **Minimising the volume of e-waste:** The program actively repurposes usable devices for extended periods or until genuine hardware failure, supported by the fastest possible GIT support to end users in case of any outage. By reducing time to repair and maximising in service time, HCLTech avoids the unnecessary churn of devices that have meaningful remaining life.
- **Reuse of parts and accessories from EOL devices:** Components and accessories harvested from end of life devices are used to repair faulty devices that are still under warranty. This reduces company repair costs, shortens turnaround times and prevents otherwise reusable parts from entering the waste stream — closing the loop between disposition and active service.



Waste intensity

Waste intensity per capita increased year-on-year, reflecting the planned UPS battery replacement and campus infrastructure works described above. The underlying operational waste profile, excluding these planned lifecycle activities, remains stable and aligned with our zero waste-to-landfill commitment.

Metric	FY26	FY25
Waste intensity per capita (MT/capita/annum)	0.0103	0.0077

Looking ahead

Our future priorities build on the strong progress achieved in FY26 and reflect our commitment to creating a more resilient and resource-conscious future. On water stewardship, we will expand real-time monitoring and sensor-based automation across more campuses, deepen collaboration through the Water Resilience Coalition and continue strengthening our replenishment efforts through afforestation and water body restoration initiatives. On waste management, we will work to maintain our Zero Waste Platinum certification, extend circular economy practices across leased facilities and enhance end-to-end traceability for electronic waste as circularity becomes more deeply embedded in our hardware lifecycle.

At HCLTech, responsible resource management goes beyond operational performance or regulatory compliance. It reflects our responsibility to protect the communities, ecosystems and shared resources that support our business and the future we are working to build.

People-centricity: Talent, Inclusion and Well-being

People at the center
of how we grow



Our people are the driving force behind our success, innovation and long-term resilience. We continue to build a workplace where talent thrives, inclusion is embedded in leadership and well-being remains a strategic priority.

In FY26, we reinforced our industry-leading commitment to employee well-being, by spending 2.08% of revenue in programs that support holistic health, growth and engagement. We maintained leadership in Board gender diversity with women representing 50% of our Board, strengthened a future-ready workforce with 31% Gen Z representation and created opportunities closer to home through employment for more than 29,000 people across regions.

Recognition in Fortune’s World’s Most Admired Companies 2026 and Forbes’ World’s Best Employers list for the sixth consecutive year, alongside an employee satisfaction score of 4.03 out of 5, reflects the culture of trust, belonging and purpose that empowers our people to excel and enables HCLTech to grow stronger, together.

Key Highlights

227,181 Employees across 60 countries	97.78% Employees took skill-upgradation training	2.08% of revenue spent on employee well-being, highest among our comparable peers	11,744 Fresh graduates onboarded in FY26
31% Gen Z representation in the workforce	50% of open positions fulfilled by internal hires	4.03 out of 5 Employee satisfaction score	12.51% Voluntary turnover down from 12.99%



Awards and recognition

External recognition during the year affirmed HCLTech’s standing as an employer and a responsible company.

Chairperson Roshni Nadar Malhotra was recognized as:

- Business Leader of the Year by the Indo American Chamber of Commerce

Featured among:

- Forbes World’s 100 Most Powerful Women
- Fortune Most Powerful Women in Asia

CEO and Managing Director C Vijayakumar was recognized as:

- India’s Best CEO (IT Services, Large Cap) by Fortune India
- CEO of the Year at the People Matters Infini T Awards India 2025
- Best CEO in Extel’s 2025 Executive Team rankings



Listed in the S&P Global Sustainability Yearbook for four consecutive years

Highest-ranked India-headquartered technology company for the second consecutive year in TIME magazine’s World’s Best Companies 2025 list



- 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 sustainable impact from the business operations

- Won six gold, three silver and 1 bronze in Brandon Hall Group – HCM Excellence Awards in “Talent Management Programs”, “HR Programs”, “Learning and Development Programs” and “DEI Programs” categories
- British Safety Council International Safety Awards 2026 – Recognized for excellence in:
 - Best in Sector – IT – Bengaluru
 - Distinction Award – Bengaluru
 - Merit Award – Noida, Chennai, Madurai, Lucknow, Vijayawada

Governance and management approach

Employee welfare and productivity at HCLTech are governed through an integrated framework of policies, leadership oversight, operating processes and performance tracking mechanisms. This framework ensures alignment between people priorities and business objectives, while enabling consistent implementation across geographies and business units. It is supported by defined accountability structures, cross-functional collaboration and periodic reviews that drive continuous improvement.

Key elements of the governance and management approach include:

- Human capital governance and accountability
- Talent and performance management processes
- Learning and development systems
- Occupational health and safety controls
- Employee support programs
- Human rights and labor practice commitments

Talent attraction and retention

At HCLTech, employee experience is not a program – it is a design principle. A structured approach to talent acquisition and onboarding enables HCLTech to align hiring with evolving business and client requirements while supporting early career integration and productivity. The company executed a talent management strategy that strengthens collaboration, cultural understanding and delivery outcomes, supported by its award-winning Employee Action and Response System (EARS) – a large-scale, digital-first approach to continuously listen, act in real time and close the loop with measurable impact.

50%
of open positions fulfilled
by internal hires

31%
GenZ representation

11,744
fresh graduates
onboarded

	New Hires		Hiring Rate	
50,903		FY26		22.6%
50,435		FY25		22.4%
47,745		FY24		21.1%
82,583		FY23		38.0%

HCLTech leverages AI-enabled talent platforms such as Talent Navigator, to strengthen both internal mobility and external hiring through standardized, data-driven talent processes. Talent Navigator’s AI-enabled agents support structured job descriptions, skill frameworks and candidate assessments, while the broader platform ecosystem enables scalable talent identification and deployment, collectively enhancing consistency, reducing subjectivity and helping mitigate potential biases in hiring outcomes.

New Vistas

Through its New Vistas initiative (established in 2015), HCLTech continues to build on its founder Shiv Nadar’s philosophy of broadening its reach in Tier 2 and Tier 3 cities to support their talent potential and infrastructure, ensuring greater inclusivity and resilience. This approach significantly reduces commute times, enhances quality of life and improves overall employee well-being, while also easing pressure on metropolitan infrastructure and lowering environmental impact. At the same time, it unlocks access to local talent and strengthens business continuity, creating sustained value for both people and the enterprise. HCLTech New Vistas has employed people across its four locations – Lucknow, Madurai, Nagpur and Vijayawada.

Continuing the New Vistas journey

All New Vistas locations hold strong certifications (USGBC, IGBC, Zero Waste), with platinum ratings across most sites and maintain ISO 45001 and BSI security certifications, ensuring global compliance. In our journey towards 100% renewable energy (RE) power across campuses, the Nagpur campus has achieved 100% RE power, making it the leading site in renewable energy adoption. Other campuses are at various stages of RE power adoption and are expected to achieve the 100% RE power target in the coming years.

The Madurai site is Net Zero Water (Platinum) and ISO 50001 certified. A strong focus on sustainability-driven practices – such as sports facilities, in-campus mobility using bicycles, carpooling initiatives and the walk-to-work concept at the Lucknow campus – continues to drive sustainability across New Vistas centers.

New Vistas Impact

10% CAGR
Workforce growth rate
of over five years

17.6%
representation in India headcount

14,000+
fresh graduates hired, 78% from
local communities

29,000+
people employed, enabling career
growth closer to home and supporting
regional development



Sports tournament at our Lucknow campus

Nearshore operations

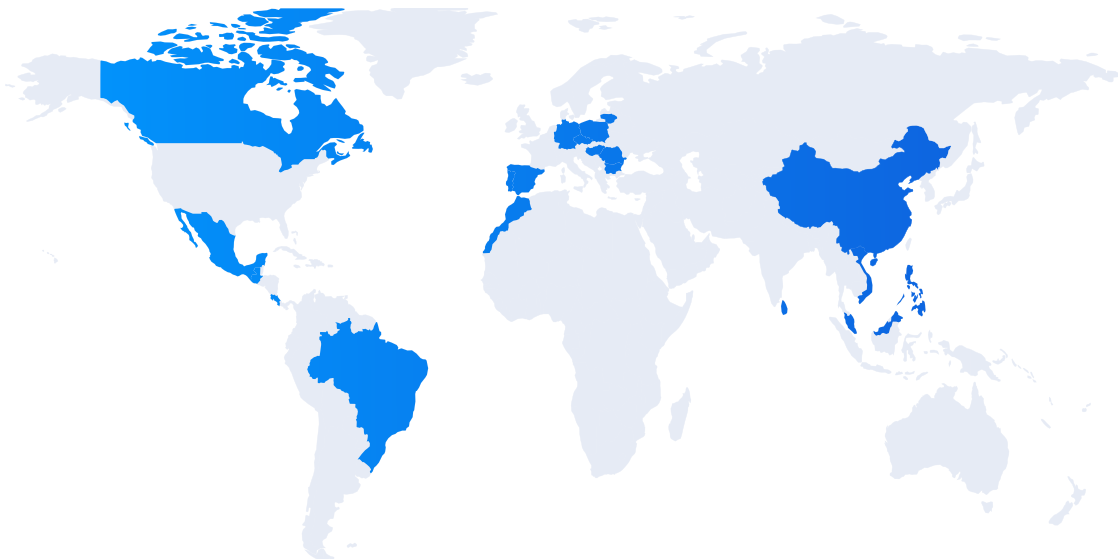
Building on its approach to hiring at scale and strengthening local talent pools, HCLTech continues expanding nearshore operations through delivery centers that enhance client responsiveness, cultural alignment, operational resilience, local employment and skills development.

Over the past three fiscal years, HCLTech's nearshore operations have expanded significantly, driven by niche technologies and innovation-led engagements. This growth, supported by government recognition in select countries, is reflected in scale, workforce composition and local talent:

- 20 locations and 100 facilities, with over **90% of employees** hired locally
- Headcount **grew 1.2%** in FY26 to 26,094
- Gender ratio across nearshore locations stands at **66:34**

Our nearshore delivery network spans across

- Americas:** Brazil, Canada, Costa Rica, Guatemala, Mexico
- Europe:** Bulgaria, Czech Republic, Hungary, Germany, Lithuania, Poland, Portugal, Romania, Spain, Morocco
- Rest of the World:** China, Philippines, Malaysia, Sri Lanka, Vietnam



TechBee

One of HCLTech's key early career initiatives is the TechBee program. Launched in India in 2017, TechBee embodies HCLTech's engineering DNA in action, designing inclusion with intent and precision. By integrating technical and professional training with opportunities for full-time employment and continued education, the program enables high-potential Class 12 graduates to build real-world experience early in their careers.

The program has partnerships with BITS Pilani, IIT Guwahati, IIIT Kottayam, IIM Sirmaur, Amity University, SASTRA University, Shiv Nadar University (SNU) and PES University.

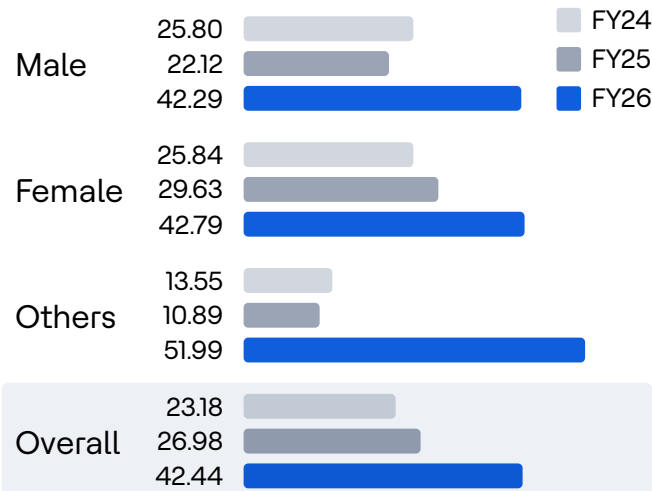
By creating structured access for students who may not have traditional pathways into technology education and employment, TechBee supports HCLTech's broader inclusion strategy, including economic inclusion and talent democratization. The program enables early identification and development of high-potential talent, creating a scalable, future-ready talent pipeline aligned with the company's engineering-led approach.

- Thus far, **22%** of the TechBees have graduated from partner universities
- **36.8%** of TechBees are women

Talent development

Career growth at HCLTech is supported through a combination of structured performance management, transparent career pathways and continuous learning.

Average no. of training hours per person



With increased focus on GenAI learning, structured fresher training and digital capability-building programs (including cloud), total training hours increased to 9.42 million hours in FY26, compared to 5.82 million hours in FY25. This scale-up in learning interventions has driven the overall increase in average training hours per employee during the year.

A structured learning ecosystem

HCLTech adopts a multi-channel learning approach combining digital platforms, instructor-led training, certification pathways and applied learning. Training needs are identified through a demand-driven workforce planning model aligned with business priorities, technology roadmaps and role-specific capability requirements. Development is further strengthened through employee resource groups, professional communities and collaborative platforms that enable

knowledge sharing and peer learning. The capability portfolio spans digital transformation, leadership development, cultural and inclusion learning and reskilling and transition interventions.

97.78%
Employees took skill upgradation trainings

42.44
Average training hours per person in FY26

100%
of eligible employees in performance and career reviews

HCLTech implements a comprehensive range of training to support workforce capability building, business readiness and long-term human capital sustainability. Key types of training include:

Technical and Digital Skills Training: Focused on emerging and core technologies such as AI, cloud, data, cybersecurity, engineering and platform skills, aligned to evolving client and market demands.

Role and Skill-based training: Structured programs mapped to job roles and career stages, covering professional, managerial and specialist capabilities.

Leadership and Manager Development: Programs designed to build people leadership, managerial effectiveness, ethical decision-making and succession readiness across leadership levels.

Behavioral and Soft Skills Training: Covering communication, collaboration, productivity, problem-solving and workplace effectiveness to support holistic employee development.

Diversity and Inclusion (D&I) Training: Targeted interventions to promote inclusion, allyship, unconscious bias awareness and equitable leadership practices.

Compliance, Ethics and Code of Conduct Training: Mandatory trainings on ethics, business conduct, data privacy, information security and regulatory requirements.

Health, Safety and Well-Being Training: Programs focused on workplace safety, employee well-being and responsible work practices.

Onboarding and Early Career Training: Structured learning journeys for freshers, new hires and early-career employees to build foundational skills and accelerate productivity.

Training needs identification

HCLTech follows a structured, demand-driven process for training needs identification, anchored in its talent build plan and demand unit-led workforce planning model, ensuring strong alignment with business strategy and future skill requirements.

Training needs are identified primarily at the demand unit level (business units, service lines, geographies and strategic accounts) based on current and forecasted client demand, technology roadmaps and role and skill-based capability requirements. These inputs are validated in collaboration with business HR, capability managers and the delivery leadership.

The talent build plan acts as the central planning mechanism, consolidating demand signals with internal skill inventories, workforce forecasts and strategic priorities. This enables systematic identification of skill gaps and informed decisions on upskilling, reskilling or talent sourcing, with a strong emphasis on internal capability building.

Reskilling and Upskilling

To build the next talent layer at scale and at the right cost, the company refreshed its operating model around well-defined capabilities and skills. Capability units anchor employee development, talent mobility, career growth and the selection of external talent, while delivery units maximize execution excellence, client-centricity and wallet-share expansion – each aligned tightly to business strategy and talent priorities.

HCLTech’s investments in digital platforms and AI-driven talent practices ensure that every individual can grow, contribute meaningfully and realize their full potential.

The company supports employees in adapting to evolving industry and technology transitions through structured reskilling and upskilling initiatives aligned to emerging areas such as automation, artificial intelligence and next-generation digital services. These programs are designed to enable workforce redeployment, minimize skill redundancy and strengthen long-term employability as business models and service delivery requirements evolve. This includes training programs focused on AI, cybersecurity and cloud platforms.

Training calendars are published by business units on SharePoint and made accessible through the MyHCLTech portal, with updates also available on the iSuccess Learning portal for employee registration.

36,400+
learning courses

220,000+
learners completed **9.42 million hours**
of learning

63.5% employees were trained
in AI skills

Democratizing AI skills

AI and GenAI learning for every employee

At HCLTech, we recognized early that AI is a transformative force reshaping how businesses innovate, improve efficiency and deliver value. Our vision is to democratize AI capabilities across the workforce, enabling every employee to confidently leverage AI in their roles through a holistic, organization-wide transformation.

Key organization-level programs are:

- AI and GenAI Literacy /Foundation for all
- AI and GenAI for Technical Cohort
- GenAI for Program Management and Corporate function
- AI and GenAI for Sales and Business Functions (Powerplay)
- AI and GenAI for Entry level Talent (Buzzforward)
- Bootcamps for quick hands-on exposure (GenAI Unplugged)
- Responsible AI
- HCLTech Solution offering and framework in NextGenTech

The programs strengthen a future-ready talent ecosystem aligned with evolving business needs in the AI and GenAI landscape. They enable effective utilization of the existing talent base to develop next-generation applications, while accelerating readiness for emerging roles through immersive learning interventions. They expand access to growth opportunities, enabling employees to pursue diverse and emerging career pathways.

The training initiative supports business transformation by enhancing productivity and operational efficiency through the adoption of advanced technologies. It also drives faster innovation and solution development, contributing to improved time-to-market and business agility. At the same time, it fosters a skilled and empowered workforce that is equipped to meet future demands.

63.5% of employees have taken advantage of the AI training

AI and GenAI training programs equip employees to navigate evolving business models and workforce demands, mitigating risks such as skill redundancy and safeguarding employment during this transition.

Learning Ecosystem

In FY26, HCLTech strengthened career wellness through an integrated ecosystem focused on internal mobility, continuous learning and meaningful recognition.

The integrated ecosystem strengthens employee engagement, career visibility and internal mobility while fostering a strong culture of continuous learning and appreciation. Employees are empowered to explore new opportunities, develop future-ready skills and feel recognized for their contributions.

TalentXchange

TalentXchange, our AI-powered internal talent marketplace, connects employees to opportunities aligned with their skills, interests and career goals, enabling internal role transitions and a unified and transparent career progression journey. This is complemented by enterprise-wide learning and development initiatives spanning technical upskilling, leadership capability-building, behavioral learning and future-ready certifications.

Mentorship

Mentorship is a key enabler of development at HCLTech. Structured mentoring, leadership coaching and peer learning are integrated into development programs. Manager-led coaching supports knowledge transfer and professional growth, while collaborative platforms help employees build networks and access diverse perspectives, strengthening leadership pipelines and long-term career development. With platforms like MentorMe and digital tools like MentorBot, powered by GenAI, we ensure personalized, scalable mentoring experiences.

76,000+

employees have participated in **25,000+ mentoring connections** since its launch in July 2023

41,000+

active employees across 60 countries

Aspire

The Aspire Learning Journey Program adopts a democratized 4D learning model, integrating e-learning, instructor-led sessions, hands-on practice and capstone projects to deliver a comprehensive learning experience. Supported by a structured curriculum with interim and final assessments, the program enables continuous skill development and progression.

Aligned with evolving business priorities and industry trends, Aspire leverages data-driven insights to identify high-demand skills and design tailored learning pathways. This ensures employees remain future ready while supporting organizational objectives. The program also strengthens talent attraction and retention by offering structured upskilling opportunities and personalized development journeys aligned with career growth.

Aspire has contributed to improved employee retention through sustained engagement, while enhancing resource utilization by maintaining a robust pipeline of trained talent for faster deployment. The program is accessible to all full-time employees.

Xtramiles

Xtramiles is HCLTech’s global, gamified recognition platform designed to foster a culture of appreciation, engagement and high performance. At HCLTech, appreciation is not just a word—it is a culture, reflected in the ~90% platform adoption across the organization.

The platform enables employees across geographies to recognize peers, managers and teams through both monetary and non-monetary rewards, reinforcing positive workplace behaviors aligned with organizational values.

It promotes inclusive and continuous recognition through features such as badges, appreciation cards, likes, comments and peer-to-peer acknowledgments—creating a strong culture of crowd recognition. Employees can also earn credits through wellness initiatives and volunteering activities, supporting holistic employee well-being and sustainability goals.

Inclusive access

Talent Development programs are designed to be scalable and accessible across the workforce, including full-time employees and, where applicable, contractual personnel, with digital learning platforms enabling consistent access across geographies. Transition assistance programs support employees through reskilling or redeployment where role requirements change, retaining talent and institutional knowledge. These programs also facilitate continued employability and the management of career endings resulting from retirement or termination of employment.

Cultural inclusion

Cultural Inclusion at HCLTech is a belief that ensures that every individual is respected irrespective of their backgrounds, cultures, nationalities, their way of working and their lifestyles. Cultural inclusion refers to differences among people because of their racial or ethnic backgrounds, language, dress and traditions. It represents the variety of the makeup or the multiculturalism of a group or organization or region. At HCLTech, we promote multiculturalism through the following programs.

- **Globesmart** is a web-based, scientific tool that helps employees work across borders with ease and leverage opportunities that arise from cultural differences and similarities. It gives quick and easy access to extensive knowledge on how to conduct business effectively with people from different countries around the world.
- **Cultural competence trainings** provide our employees with key cultural insights and in-depth knowledge about social and business protocols of other geographies.



Embracing cultural diversity and fostering belonging across campus

Building better people managers

Manager capability at scale

HCLTech runs two complementary programs to strengthen the quality of its people managers. The Certified People Manager Program develops conversational skills in people managers, building a culture of inclusion. More than 12,500 managers have been certified since its inception. Certified managers show measurably stronger outcomes than their peers in mentoring, recognition and the diversity of the teams they lead. The Elevate program focuses on deployment readiness, preparing people for live project roles. More than 13,000 employees have been trained since its inception, with a high rate of project deployment following training.

Women career development programs

Ignite

Designed for early-career female professionals, it focuses on building strong career foundations through confidence building, effective communication, networking and problem-solving skills. The program blends self-paced learning, habit-nuggets and interactive masterclasses to help participants transition confidently into professional roles. In FY26, Ignite saw 1,873 early-career women professionals complete the program.

Momentum

Targeted at mid-career women professionals, it aims to strengthen leadership readiness by developing strategic thinking, executive presence and collaboration capabilities.

The journey combines curated self-paced content with live masterclasses and reflective practices to help participants step into broader leadership responsibilities. In FY26, 464 mid-career women professionals completed the program.

Surge Ahead

Built for senior women professionals, it prepares participants for executive-level leadership roles. The program focuses on advanced leadership capabilities, navigating complex business challenges and building influential leadership presence through a blend of self-paced learning, habit-based reinforcement and high-impact masterclasses. In FY26, 47 senior women professionals completed the program.

Value Creation

For over 15 years, Ideapreneurship has been a cornerstone of HCLTech’s culture, reflecting a sustained commitment to translating talent investments into enterprise value. The Value Creation Portal – HCLTech’s engineering DNA in action – plays a central role in this journey, bringing together diverse insights and expertise from across the organization to drive client-centric innovation. As a structured mechanism embedded within the operating model, it enables HCLTech to systematically cultivate innovation at scale and convert individual capability into collective impact.

This sustained success is a direct outcome of the company’s long-term investments in talent development, demonstrating how structured capability-building initiatives translate into measurable business value.

Value Creation Portal

Over **37,500 contributors** in FY26 generated **18,900+ ideas**, of which **8,500+ were implemented**, delivering approximately **\$1.6 billion** in client value over and above contractual commitments

13,694 unique contributors,
3.7% y-o-y growth

\$17 billion overall value delivered since 2007

The contributions are recognized through Xtramiles, celebrating and rewarding exceptional achievements and impactful ideas within our organization

- **5,100+ employees** were recognized for 3,500+ ideas across 30+ countries

Partnerships with academia

HCLTech is bridging the industry-academia gap through a structured partnership with select institutes by bringing real-world industry practices into the academic ecosystem—contributing to curriculum design, mentoring students and delivering industry-aligned assessments, workshops and expert sessions. The focus is on enabling practical, experience-backed learning through exposure to live problem-solving, emerging technologies and industry tools, while also upskilling faculty and knowledge exchange. This integrated approach ensures students are better aligned to industry expectations, making them workforce-ready from day one.



Creating industry-ready talent through experiential learning programmes

India

- HCLTech enabled higher-education engagement through formal learning and development policies, including the TechBee higher education pathway and postgraduate education programs. The TechBee program supports early career professionals by combining structured on-the-job training with higher education opportunities through affiliations with institutions such as **BITS Pilani, SASTRA University, Amity University, IIM Nagpur and the University of Petroleum and Energy Studies (UPES)**. In parallel, the postgraduate education program enables employees to pursue advanced academic qualifications through empaneled colleges, governed under internal higher-education policies, reinforcing HCLTech’s commitment to continuous learning and long-term capability building.
- HCLTech signed a Memorandum of Understanding (MoU) with the **Indian Institute of Technology (IIT) Guwahati** to offer TechBee employees a pathway to advanced education in AI and related technologies. Under the agreement, eligible HCLTech employees will be offered a four-year online Bachelor of Science (Honors) degree in Data Science and AI.

- HCLTech and the **Indian Institute of Technology (IIT) Kanpur** signed an MoU to jointly convert cutting edge research into real world pilots and scalable solutions for Global Capability Centers (GCCs). The collaboration positions HCLTech as a trusted GCC partner for enabling research-led innovation, especially in advanced engineering and deep tech with a strong focus on AI, robotics and next generation technologies.

United States

HCLTech joined the **MIT Media Lab** to advance AI and emerging technologies, including quantum computing, through collaborative research and the development of scalable, real-world innovations.

Australia

HCLTech partnered with the **University of Western Australia (UWA)** to co-develop globally accessible micro-credential programs in AI and cybersecurity, helping build future-ready digital skills through industry-aligned, hands-on learning.

Performance review and career development

Complementing its talent development ecosystem, HCLTech’s performance management framework is designed to align individual and team contributions with broader business outcomes, while ensuring fairness, transparency and consistency in evaluation and recognition. The framework integrates structured goal setting, ongoing feedback and multi-layered assessment processes, incorporating self-evaluation, manager inputs and broader stakeholder perspectives. These are supported by robust calibration mechanisms that promote objectivity and equity across the organization. Continuous performance conversations and team-based evaluations further enable agility and responsiveness in dynamic business environments.

The Performance Review Architecture operates as a unified and scalable framework, tailored to different levels of responsibility across the organization. At senior leadership levels, performance is guided through clearly defined and measurable parameters aligned directly with strategic and financial outcomes. At mid-management and professional levels, structured goal frameworks translate organizational priorities into measurable individual contributions.

Across all levels, the framework maintains a consistent approach to aligning individual contributions with organizational priorities through outcome-driven metrics and structured evaluation processes. Performance is anchored in a combination of data-backed achievements and managerial evaluation, enabling a holistic and uniform assessment across diverse roles. This integrated design supports a performance-linked reward model that reflects organizational performance, business priorities and individual impact.

By standardizing processes, strengthening calibration and enabling equitable recognition of contributions across roles and geographies, the framework reinforces HCLTech’s commitment to fairness, inclusivity and responsible growth. It supports not only business outcomes, but also employee trust, engagement and long-term value creation.

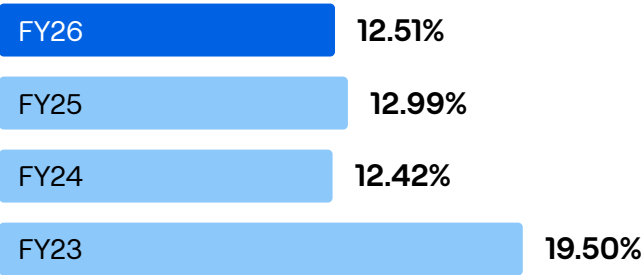
In FY26, 100% of eligible employees participated in the performance review process, reflecting the scale, consistency and institutionalization of this framework across the organization.

Employee satisfaction

At HCLTech, we focus on building a workplace where employees feel empowered, valued and supported to grow. Our people-centric approach emphasizes continuous development, well-being and an inclusive culture that fosters trust, engagement and a strong sense of belonging.

This commitment is reflected in sustained improvements in workforce stability. Voluntary turnover has declined from 19.50% in FY23 to 12.51% in FY26, indicating stronger employee engagement, career alignment, learning, well-being, manager capability and connection to the organization’s purpose. Key retention drivers include transparent career pathways, manager enablement programs, internal mobility and upskilling, performance-linked recognition and comprehensive employee support.

Voluntary turnover



Listening to our people

HCLTech’s most recent third-party Employee Engagement Survey, conducted in 2023 and valid for three years, gathered feedback from over 86,000 employees and returned a satisfaction score of **4.03 out of 5**. The survey is designed to capture multiple dimensions of the employee experience, including overall job satisfaction, sense of purpose and meaning in work, workplace well-being and stress levels. These surveys provide insights into both external and internal motivators, helping the company understand how employees perceive their roles, their alignment with organizational purpose and their overall experience at work. The insights generated enable targeted interventions to strengthen engagement, enhance workplace satisfaction, support employee well-being and address areas of concern.



Fostering belonging through meaningful employee engagement initiatives

Beyond the survey, HCLTech uses structured feedback mechanisms and enterprise listening practices, including 360 degree reviews, EPIC Feedback, the My Passion Report and the People Engagement Maturity Index, to capture sentiment across the employee lifecycle. These are complemented by Xtramiles, Passion Studio and employee resource groups focused on gender, culture and inclusion, alongside leadership interactions, wellness programs and volunteering opportunities.

Mindful Mondays

Embedding sustainability in our culture

Mindful Mondays is a recurring internal communication series that connects sustainability to everyday choices, making the topic accessible, relevant and actionable for employees across functions and geographies. Themes span environmental responsibility, resource conservation, energy and water mindfulness, waste reduction, well-being, conscious consumption, digital sustainability and community impact. By embedding these topics into regular communication, the initiative strengthens awareness, encourages behavioral change and positions sustainability as a collective mindset rather than a standalone agenda.

Sustainability School

HCLTech’s Sustainability School continues to play a key role in building organization-wide awareness and capability on environmental and social priorities. The platform offers curated learning pathways across core sustainability themes such as climate transition, energy efficiency, circular economy, responsible consumption, biodiversity, social impact and ethical business practices. These modules are designed to make sustainability relevant to employees across functions, enabling them to understand how their roles contribute to broader organizational and global goals. The Sustainability School supports continuous learning and encourages employees to embed sustainability considerations into day-to-day decision-making. Through this approach, HCLTech is strengthening a culture where sustainability is integrated into business thinking and individual action.

Sustainability Changemakers

The HCLTech Sustainability Changemakers program brings our purpose to life by empowering employees to turn personal conviction into collective action. It creates space for people across functions and geographies to become advocates for more sustainable choices in the way we work, collaborate and engage with our communities. More than a program, it is a growing movement of employees who lead by example, sparking awareness, inspiring participation and showing that meaningful change often begins with one informed voice and one intentional action. In doing so, Changemakers help build a culture where sustainability is not seen as separate from work, but as part of who we are and how we create lasting value.

Diversity and Inclusion

A workforce that reflects the world we serve

HCLTech is building a workforce that reflects the diversity of its clients and the communities where it operates. The company’s approach combines transparent measurement, structured development programs for underrepresented groups and an inclusive culture in which every individual is respected regardless of background, identity or way of working.

29.58%

Permanent female employees, up from 28.81% the previous year

32.7%

Female new hires

27.4%

increase in differently-abled employee headcount

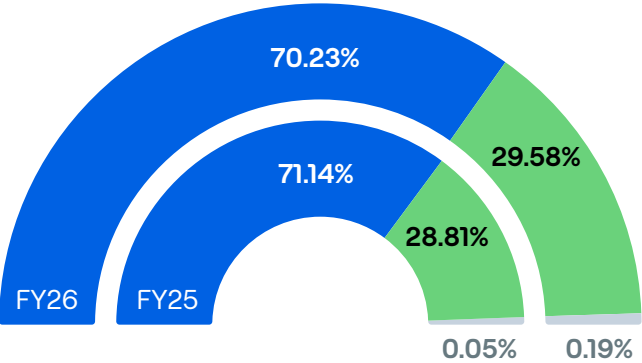
46%

Campus hires are women



Building an inclusive culture that empowers every individual

Employee (FTEs) breakdown by gender



	Male	Female	Others
FY26	159,550	67,197	434
FY25	158,943	64,364	113

Advancing gender diversity

The share of permanent female employees rose to 29.58% in FY26 from 28.81% the previous year. HCLTech is working towards 40% women in the workforce by 2030 and 30% representation in senior leadership by 2030, supported by structured development programs such as ASCEND and Stepping stones that build the pipeline of women leaders. Zero tolerance policies on harassment and transparent pay equity practices apply globally.

Inclusion across dimensions

Beyond gender, HCLTech’s inclusion agenda extends to persons with disabilities, cultural and ethnic diversity and generational diversity. Employee resource groups and communities focused on gender, culture and inclusion give employees a platform to connect, contribute and lead. Accessibility and inclusive design are embedded into the workplace and into the company’s offerings, reflecting a belief that inclusion is both a workforce commitment and a design principle.

D&I strategy

The Diversity and Inclusion (D&I) strategy is structured around two foundational dimensions: Leveraging Diversity for enhancing organizational effectiveness through different perspectives, experiences and abilities and Leading Inclusively by creating a sense of belonging where each employee feels respected, valued and supported to do their best work. The strategy operates through three interconnected levers – talent attraction, talent retention and talent growth – ensuring a unified experience across the enterprise.

D&I governance at HCLTech is not an overlay to business; it is how the business is run. The governance model ensures that inclusion is experienced consistently, not selectively, embedding accountability, adaptability and

insight at every level, transforming D&I from an aspirational agenda into a measurable, enterprise-wide discipline.



Driving inclusion through collaboration, dialogue and shared growth

Four Pillars of Inclusion

HCLTech’s inclusion framework is built on four strategic pillars, each supported by dedicated programs, Employee Resource Groups (ERGs) and policies that translate intent into sustained, measurable impact.

Gender

WCDP (Ignite, Momentum, Surge Ahead), Feminspiration, iMotivate, ParentPro (Momtastic), MentorMe, Mum-Connect community

Disability

Ability Connect Network ERG (incl. WAND – neurodiversity), Reasonable Accommodation and Accessibility Policy, RPWD Act 2016 Compliance, PEEP guidelines, Accessible infrastructure

LGBTQIA+

Pride@HCLTech ERG, Coffee Hour, Reverse Mentoring, Pride Month celebrations, Allyship drives

Cultural

Multicultural ERG (MERG), GlobeSmart cultural assessments, Allyship programs, Inclusion Lab, HCLTechVets ERG

Gender Inclusion

Gender inclusion is a cornerstone of HCLTech’s D&I agenda, driven by a comprehensive ecosystem of programs designed to attract, retain and grow women talent across all career stages. **The Women Career Development Program (WCDP)** operates through three tiers: **Ignite** (early career), **Momentum** (mid-career) and **Surge Ahead** (senior leadership), equipping women with the skills, sponsorship and visibility needed to advance into influential roles.

Feminspiration, a flagship speaker series, hosted 14 sessions in FY26 with 3,850+ attendees, bringing together inspiring leaders to share career journeys and insights. **iMotivate** sessions engaged 2,600+ employees in leadership and motivation conversations.

The **MentorMe Program** has been transformed from an informal advantage into a scalable, measurable development mechanism. With 76,000+ participants, 25,000+ mentoring connections, 41,000+ active enrollments across 60 countries and a 90% positive experience rating, MentorMe has become a key enabler of career growth.

ParentPro (Momtastic) provides holistic support for women navigating maternity and return-to-work transitions, contributing to a 99% post-maternity return rate.

The Women Connect Network ERG anchors gender inclusion at the grassroots level, driving peer support, networking and advocacy to create a thriving environment for women across geographies.

Disability Inclusion

HCLTech is committed to building a workplace where persons with disabilities feel valued, supported and empowered to contribute fully. The **Ability Connect Network ERG** serves as the primary advocacy platform for disability inclusion, encompassing **WAND (We Appreciate Neurodiversity)**, a dedicated initiative focused on neurodiversity awareness, acceptance and workplace support.

The **Reasonable Accommodation and Accessibility Governance Policy** mandates physically and digitally accessible workplaces, including accessible entrances, lifts, restrooms, emergency exits and WCAG-aligned digital accessibility. The Personal Emergency Evacuation Plan (PEEP) provides tailored assistance to self-identified employees with disabilities during emergencies across India locations.

HCLTech ensures full compliance with the **Rights of Persons with Disabilities (RPWD) Act 2016**, including statutory disability levy reporting and proactive accommodation practices. Through HCLFoundation, the company has empowered over **15,000+ persons with disabilities** through skilling, rehabilitation and livelihood programs.

Accessibility is supported through digital inclusion initiatives, including adherence to Web Content Accessibility Guidelines (WCAG), to ensure that internal and external digital platforms are usable and accessible to all users.

These initiatives have contributed to a **27.4% increase in employees with disabilities**, with representation reaching 1,269 employees, reflecting continued progress in expanding workforce diversity.

LGBTQIA+ Inclusion

HCLTech fosters an environment where LGBTQIA+ employees can bring their authentic selves to work. The **Pride@HCLTech ERG** drives year-round engagement through Coffee Hour sessions, Reverse Mentoring and Pride Month celebrations, featuring storytelling, panel discussions and allyship drives.

The ERG serves as a platform for community building, policy advocacy and education, ensuring that inclusion goes beyond awareness into sustained cultural change.

Cultural Inclusion

With 227,000+ employees across 166 nationalities in 60 countries, cultural inclusion is essential to how HCLTech operates. The **Multicultural Employee Resource Group (MERG)** drives cross-cultural understanding through events, dialogues and collaboration opportunities that celebrate the richness of HCLTech’s global workforce.

GlobeSmart Cultural Assessments, with 1,724 licenses deployed in FY26, equip employees and leaders with the tools to navigate cultural differences effectively in global teams. The Inclusion Lab offers experiential learning sessions designed to embed inclusive behaviors into everyday interactions.

The **HCLTechVets ERG** supports military veterans transitioning into the corporate workforce, providing mentoring, networking and career development resources, recognizing the unique strengths and perspectives veterans bring to the organization.

Employee Resource Groups (ERGs)

ERGs are the grassroots engine of HCLTech’s inclusion culture, operating as employee-led communities that drive advocacy, awareness and belonging across the organization.

HCLTech operates six ERGs:

- **Women Connect Network:** Advancing gender equity, women’s leadership and peer support
- **Pride@HCLTech:** LGBTQIA+ inclusion, allyship and safe-space engagement
- **Ability Connect Network (including WAND):** Disability inclusion, neurodiversity awareness and accessibility advocacy
- **Multicultural Employee Resource Group (MERG):** Cultural inclusion and cross-cultural competence
- **Single Parent Network:** Support, resources and community for single-parent employees
- **HCLTechVets:** Veteran transition support, mentoring and career development

Each ERG operates under a structured governance model with executive sponsors, regional leads and annual impact reporting, ensuring alignment with the enterprise D&I strategy while remaining responsive to local needs.



Championing diversity through engagement, allyship and cultural understanding

Employee well-being

Well-being at HCLTech spans physical health, mental health, ergonomic safety and preventive care, supported by a foundation of comprehensive health and insurance benefits for eligible employees that may extend to dependents where applicable. Programs are reviewed regularly to ensure they remain relevant, inclusive and responsive to the evolving needs of employees and their families. The cost of well-being includes health insurance, accident insurance, maternity benefits, paternity benefits and day-care facilities.

Maintained industry leadership with the highest spending on employee well-being at **2.08%** of total revenue

Managed Healthcare

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 1,000 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.

The company also offers corporate mental wellness and “Life Coach” consultations designed to help employees manage stress, anxiety and lifestyle challenges.



Prioritising employee well-being through accessible healthcare and support

Employee Insurance

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.

Employee support programs

HCLTech provides employee support programs that promote health, well-being and work-life balance throughout the employee lifecycle. These include counseling services, employee assistance resources and other support mechanisms to help employees navigate personal and professional challenges. Family-oriented benefits, including maternity, paternity and adoption leave, further support employees during important life transitions.

Childcare facilities or contributions

HCLTech provides childcare support through on-site and partner-based facilities in select locations, along with policies designed to support employees with caregiving responsibilities. These initiatives aim to enable continued workforce participation, particularly during early childcare phases.

Breast-feeding / lactation facilities or benefits

Designated facilities and infrastructure, including lactation rooms at major office locations are provided to support returning mothers. These are complemented by flexible work arrangements to facilitate a smoother transition back to work.

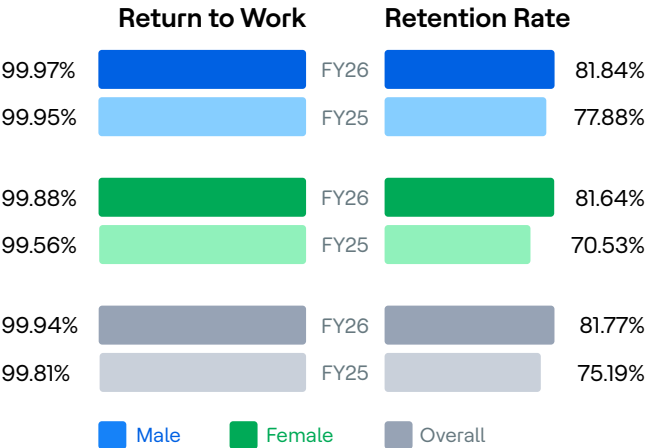
Parental leave and caregiving support

HCLTech offers paid parental leave of 26 weeks for primary caregivers in accordance with applicable regulations and internal policies. Paid leave of five days is also provided to non-primary caregivers to support shared caregiving responsibilities.

These benefits are complemented by additional support measures, such as adoption leave, surrogacy leave and maternity leave extension designed to address diverse personal circumstances. Together, these programs aim to provide a supportive and inclusive work environment that recognizes employees’ responsibilities beyond their professional roles.

Parental leaves are applicable to HCLTech employees in India. For the rest of the countries, the company adheres to respective local laws regarding parental leaves.

In FY26, **99.94%** returned to work and **81.77%** remained with the organization after one year, indicating strong reintegration outcomes and sustained workforce retention.



ParentPro

HCLTech’s ParentPro program supports employees through key parenting and caregiving milestones, recognizing the impact of parenthood on employee well-being, career continuity and retention. The program combines leave benefits, flexible work arrangements, well-being support and reintegration initiatives to help employees balance professional and personal responsibilities.

In India, HCLTech provides 26 weeks of fully paid maternity leave and five days of paternity leave. In the event of the mother’s demise during childbirth, the father is entitled to 26 weeks of paid leave.

Flexible work support

- Extended work-from-home options post maternity leave, subject to business and client requirements
- Flexible work arrangements and exemption from night shifts during the transition period

Career continuity and return-to-work support

- Project continuity support, protection from bench movement and performance rating safeguards
- Structured reintegration through the **Momtastic** program, including returnee connects, manager enablement and transition support
- Proactive engagement interventions to facilitate successful return-to-work and retention

Health, well-being and parenting support

- Maternal health, wellness and postnatal care programs
- Access to healthcare resources, counselling, insurance guidance and well-being services
- Parenting and caregiving resources for both mothers and fathers

Community and childcare support

- Mum Connect, a peer platform for expecting and new mothers
- Access to onsite and near-site daycare facilities

Through ParentPro and Momtastic, HCLTech continues to strengthen employee experience and inclusion.

81.6% maternity returnee retention globally (up from 70.5% in FY25)

Emotional and mental well-being

Employee well-being is supported through a globally integrated framework that combines flexible work practices, structured well-being programs and people-centric policies, ensuring consistency while allowing for regional customization.

Flexible work models – including hybrid working, remote options and flexible hours are embedded across geographies to enable employees to better manage personal and professional priorities, supporting both productivity and overall well-being.

Across regions, the organization delivers a comprehensive suite of mental and emotional well-being programs differentiated by their preventive, continuous and personalized approach rather than episodic interventions.

Key global elements include:

- 24x7 Employee Assistance Programs (EAPs) offering confidential counselling support for employees and their families across geographies
- Structured resilience and emotional well-being workshops on well-being, focusing on stress management, mindfulness, burnout prevention and emotional agility
- Manager enablement programs such as CPMP modules, equipping leaders to identify early signs of distress and proactively support team well-being
- Digital well-being platforms and self-help tools, providing on-demand access to guided meditation, cognitive behavioral resources and mental fitness modules
- Campaign-led engagement (e.g., mental health awareness months, global well-being weeks) to normalize conversations around mental health and reduce stigma



Encouraging healthier lives through wellness and active participation

Keeping experienced talent through parenthood

Retaining and reintegrating returning parents

HCLTech implemented a set of focused, data-driven interventions during FY26 to strengthen retention of maternity leave (ML) returnees. These actions were designed to enable early identification of reintegration challenges, provide timely support and ensure consistent governance and accountability across the return-to-work journey. Key initiatives implemented are outlined below:

- Conducted structured one-on-one connects with every ML returnee during the first 12 months post return to understand risks early and support reintegration
- Implemented systematic sentiment tracking (Positive / Neutral / Negative) with concern tagging to enable targeted interventions and escalation
- Resolved returnee concerns in coordination with HR and D&I advocates, including role alignment, flexibility, workload and manager support issues
- 100% escalation of negative sentiment cases for time-bound action and leadership visibility
- Executed notice-period interventions, resulting in notice revocations and prevention of avoidable attrition
- Enabled extension support for eligible ML returnees during transition periods to stabilize early months post return
- Ensured protection from bench movement (up to 12 months) and protected performance ratings during the reintegration phase, in line with policy communication
- Actively tracked bench cases, project tagging and role deployment gaps and followed up with LoBs for timely allocation
- Maintained central tracking of ML returnees, including engagement status, concern closure and retention movement (month-on-month and YoY).

Holistic Well-being Ecosystem

Programs such as Be-Well (in India) and equivalent regional initiatives are part of a broader global well-being architecture that addresses:

- Physical well-being through fitness challenges, preventive health programs and lifestyle coaching
- Emotional well-being through structured mental health support and awareness initiatives
- Social well-being via Employee Resource Groups (ERGs) and community-building platforms
- Purpose and engagement through initiatives such as iWoW (Integrated Way of Well-being), embedding well-being into the employee experience lifecycle

These initiatives are delivered through a blend of digital platforms and local engagement, ensuring scalability and accessibility across diverse workforce segments.

Support During Organizational Change

During periods of organizational or operational change, well-being is reinforced through structured transition frameworks that prioritize:

- Transparent and timely communication
- Advance notice and clear guidance
- Access to managerial and counselling support
- Tools and resources to help employees adapt effectively

This ensures continuity, reduces uncertainty and supports employees holistically through change journeys.



Enabling successful transitions through collaboration and support

Case Study

iWoW: Building a Culture of Holistic Employee Well-being

In FY26, HCLTech significantly strengthened its global employee well-being ecosystem through iWoW – the Integrated World of Well-being, a comprehensive framework designed to support employees across physical, emotional, social, financial, intellectual and career well-being dimensions across the globe. Anchored in the philosophy that well-being is not a standalone initiative but an integral way of life, iWoW brings together multiple enterprise-wide programs into a unified and consistently delivered employee experience across geographies.

At its core, iWoW adopts a proactive and preventive approach, embedding well-being into the everyday employee lifecycle through curated, continuous

and accessible interventions. The initiative delivers a wide range of structured wellness engagements, including sessions on yoga, mindfulness, emotional resilience, stress management, ergonomics, nutrition and financial well-being, ensuring relevance across diverse employee needs and regional contexts.

Signature programs such as YUJ (Yoga the Ultimate Journey) and Sportathon act as high-impact engagement drivers, encouraging employees globally to adopt healthier lifestyles through fitness experiences, structured wellness challenges and team-based participation models. These are complemented by digital well-being platforms and hybrid delivery formats, enabling seamless access for employees across locations, roles and work modes.

Case Study

Mental health focus

A strong mental health focus is embedded within iWoW, reinforcing the organization’s commitment to emotional well-being through targeted interventions and systemic enablement. Regular manager-led check-ins foster open dialogue and psychological safety within teams, while training equips managers and employees to proactively identify and respond to early signs of mental health concerns. The Yuj mindfulness initiative further enhances this ecosystem by providing guided practices such as meditation and breathing exercises, enabling employees to actively manage stress and build emotional resilience.

In addition, employees have access to confidential counselling and emotional well-being support platforms, alongside leadership-led conversations on empathy, burnout awareness and psychological safety, further normalizing well-being discussions at the workplace.

To ensure equity, inclusivity and scale, iWoW is delivered through a robust ecosystem of digital platforms, HR partnerships and employee champion networks, enabling meaningful participation across geographies. Family-oriented well-being initiatives and awareness campaigns further extend the impact beyond the workplace, reinforcing a culture of care, community and belonging.

Impact Created

iWoW has played a pivotal role in mainstreaming well-being as a shared organizational priority, leading to increased participation and engagement in well-being initiatives across regions by 50% YoY. It has led to improved employee awareness and proactive adoption of holistic health practices, stronger social connectedness and team cohesion through shared experiences and greater openness and normalization of mental health conversations.

Passion Clubs and Community Culture Platforms

In FY26, HCLTech strengthened social wellness through Passion Clubs, employee communities, cultural forums, sports initiatives and engagement experiences such as Arclights and Sportathon. Employees participate in music, dance, theatre, arts, wellness, volunteering and sports communities supported through employee champions and leadership sponsorship.

These initiatives improved social connectedness, collaboration, inclusion and employee engagement by creating spaces for employees to build meaningful relationships, showcase hidden talents and foster a stronger sense of belonging.

Financial well-being

HCLTech provides mechanisms to ensure fair and compliant compensation practices. The provisions are intended to support equitable compensation for additional work requirements and provide employees with financial predictability.

Long-term incentive programs

HCLTech offers long-term incentive (LTI) arrangements as part of its broader performance and rewards framework, designed to align employee outcomes with sustained business performance and long-term value creation. These incentives may include performance-linked cash components and, where applicable, equity-based instruments such as stock-linked awards, depending on the employee's role and compensation structure.

The LTI program is extended to selected employees below senior management level, based on role criticality, performance and business requirements. For employees on a Key Performance Parameter (KPP)-based bonus plan, LTI outcomes are linked to KPP achievement levels, reflecting individual performance against defined objectives.

LTI payouts are structured over a multi-year horizon, with disbursement typically occurring in two tranches — at the end of Year 1 and Year 3 — to reinforce retention and long-term alignment with organizational goals. The program is applicable to approximately 18.5% of the workforce below senior management level.

Select roles, particularly within Corporate Sustainability and Global Workplace Solutions (GWS) teams, carry performance goals aligned to ESG priorities.

Human rights and labor practices

HCLTech's approach to human rights and labor practices is guided by its commitment to fair, equitable and responsible employment conditions across its global operations and value chain. These commitments are articulated through publicly available policies including the Human Rights Policy, the Code of Business Ethics and Conduct (COBEC) and the Supplier Code of Conduct and are aligned with internationally recognized frameworks:

- UN Guiding Principles on Business and Human Rights (UNGPs),
- ILO conventions

Labor practice commitments extend across the company's own workforce as well as to contractors and business partners through contractual requirements and the Supplier Code of Conduct, reinforced through onboarding, policy communication and training.



Fostering a workplace built on fairness, ethics and inclusion

Policy Framework and Governance Oversight

HCLTech's responsible business practices are anchored in a comprehensive policy framework covering sustainability, ethics, human rights, data privacy, cybersecurity, governance and employee well-being. Policies are developed and periodically enhanced through collaboration among HR, Legal, Compliance, Sustainability and Risk functions, helping align business operations with regulatory requirements and stakeholder expectations. Governance is reinforced through structured reviews and Board-mandated oversight, including the Policy Review Board (PRB) and the ESG & DEI Committee of the Board. Effective implementation is driven through business integration, employee communications, training, engagement programs and embedded accountability mechanisms across geographies. The framework supports measurable ESG outcomes by strengthening compliance, risk management, responsible conduct, data protection, inclusion and well-being. Its effectiveness is continuously monitored through non-financial KPIs, internal assessments, periodic reporting and public disclosures in the Sustainability Report and BRSR.

Human rights commitment and due diligence

HCLTech's Human Rights Policy, supported by COBEC and other governance policies, sets out the company's commitment to respecting internationally recognized human rights and addressing adverse impacts linked to its operations. It covers key human rights and labor issues, including forced and child labor, freedom of association, collective bargaining, non-discrimination and safe and healthy working conditions. These expectations apply across HCLTech's operations and extend to suppliers and business partners through the Supplier Code of Conduct.

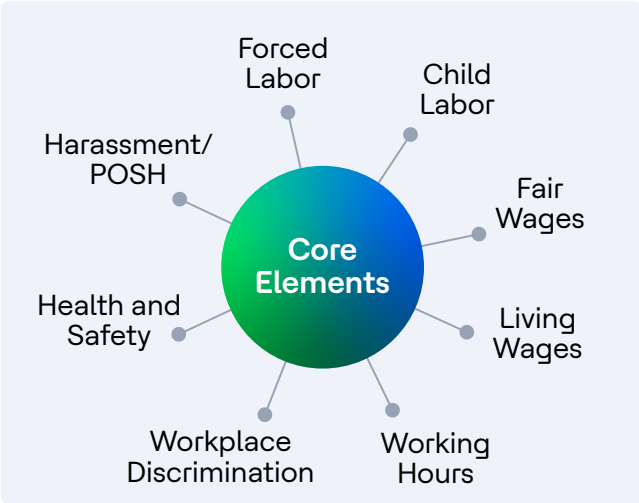
HCLTech adopts a risk-based human rights due diligence approach to identify, assess and address potential human rights impacts across its operations, relevant value chain activities and new business relations such as mergers and acquisitions.

Human Rights Due Diligence (HRDD) Assessment

The company does a systematic periodic review of the risk mapping of potential issues. In FY26, an independent Human Rights Assessment was conducted across selected India operations, covering Noida, Bengaluru and Chennai and all direct employees within the assessed boundary, assessed during FY26 and including both policy review and site verification. The assessment evaluated key issues such as child and forced labor, discrimination, wages, working conditions, health and safety and harassment. It considered the experiences of employees, contractor workers, women, migrant workers, persons with disabilities and young recruits. It also covered all on-site contractors and third-party workers, including facility management, security, housekeeping and cafeteria services, with risks identified and corresponding mitigation actions and responsibilities defined. No significant risks were identified. The company is currently working on strengthening the mechanisms to conduct internal assessments to track these indicators annually.

The assessment report comprehensively covers **eight core Human Rights elements** 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) as well as BRSR.

The FY26 Human Rights Assessment rated HCLTech significantly above average across the assessed human rights elements, with specific opportunities identified to strengthen implementation across selected documentation practices.



Human Rights Risk Management

HCLTech maintains multiple channels and processes to mitigate and remediate negative human rights impacts, including operational controls, supplier standards and accessible grievance mechanisms. The FY26 assessment confirmed that foundational systems exist, including the policy framework, grievance channels and the OHS management system and provided a prioritized improvement roadmap. Processes to mitigate risk include policy-based requirements across labor practices and workplace conduct, governance controls across OHS and workplace standards and supplier contractual requirements under the Supplier Code of Conduct. All recommendations have been turned into corrective actions and implementation has been initiated. Grievance and redressal mechanisms include the HEAR portal, whistleblower channels, Internal Complaints Committees under POSH and supplier and contractor grievance access

routes. The assessment noted operational evidence of grievance governance and oversight, while highlighting awareness improvements, particularly for contractor workforce segments, as a priority.

In FY26, the remediation roadmap applied to the three assessed India sites of Noida, Bengaluru and Chennai, with actions categorized into short-, medium- and long-term priorities for strengthening auditability and implementation consistency. Remediation actions span policy and documentation alignment, strengthened training coverage and completion tracking, role and accountability reinforcement and enhancements to site-level communication and grievance accessibility.

Accountability and tracking

The remediation plan governance includes a defined reporting line from Site HR Head to the Chief Human Resources Officer to the ESG & DEI committee of the Board, a structured tracking frequency of monthly initially and then quarterly and evidence archiving to support audit readiness and continuous improvement.

Labor practices

Fair wages and compensation

HCLTech maintains structured compensation frameworks designed to ensure compliance with applicable wage regulations across all geographies while promoting fairness, internal equity and equal remuneration. Compensation levels are set above statutory minimum wage requirements and are periodically reviewed to remain competitive and consistent across the organization. Overtime, where applicable, is governed and compensated in accordance with local labor laws and company policies. HCLTech recognizes the increasing global focus on living wage considerations and the distinction between statutory minimum wages

and wages that adequately cover the basic needs of employees and their families. While a formal, globally standardized living wage framework is not yet established, the company is actively monitoring regulatory developments, evolving client expectations and emerging international methodologies, including relevant living wage benchmarks.

HCLTech is exploring the applicability of such approaches across its operations to inform future compensation practices. In parallel, the company is progressively strengthening its understanding of responsible pay practices across its extended value chain through ongoing engagement and due diligence, where relevant. In the interim, HCLTech remains committed to responsible pay practices, ensuring compliance with minimum wage requirements and maintaining a fair, equitable and competitive compensation structure.

Gender Pay Indicators

HCLTech is committed to ensuring fairness and equity in compensation practices, including the principle of equal remuneration for men and women. Structured compensation frameworks and standardized processes support internal equity and consistency in pay outcomes across roles and geographies. Gender-related workforce and compensation indicators are monitored as part of broader diversity and inclusion initiatives, with periodic reviews and disclosures contributing to transparency and continuous improvement.

Freedom of Association, Collective Bargaining and Employee Participation

HCLTech respects employees' rights to freedom of association and collective bargaining in accordance with applicable laws and regulations. The company engages in good faith with unions

or works councils where such mechanisms exist. Participation is further enabled through structured grievance mechanisms, ethics helpline channels and ongoing engagement practices that allow employees to raise concerns, provide feedback and contribute to improvements in working conditions. These processes support open dialogue and strengthen workforce engagement across the organization.

22 countries

where recognized Workers Councils or Unions are present

Working hours and overtime

Working hours are managed in line with legal requirements and internal policies that define standard and maximum working hours. Overtime work is governed through defined policies, with remuneration structured in accordance with applicable labor laws across operating geographies. Monitoring mechanisms and managerial oversight are in place to manage overtime effectively and to avoid excessive working hours, supporting employee well-being.

Leave and employee benefits

Employees are entitled to statutory leave benefits, including paid annual leave, governed by policies on accrual and utilization, with systems to track leave balances and encourage employees to use their entitlements. These are complemented by broader benefits such as health coverage, family benefits and flexible work arrangements.

Workforce transitions

The company follows structured processes for workforce transitions, including defined notice periods and conditions aligned with regulatory requirements, providing employees with transparency and a reasonable transition time in the event of role or organizational changes.



Supporting employees through change with transparency, reskilling and career continuity

Learning, reskilling and workforce readiness

HCLTech invests in continuous learning, reskilling and upskilling to support workforce readiness in a changing business environment, helping employees adapt to technological and industry shifts and strengthening long-term employability.

Grievance redressal and oversight

Labor-related concerns may be raised through formal grievance mechanisms and the company’s whistleblower framework, which provide structured processes for reporting, investigation and resolution, supported by confidentiality safeguards and governance oversight.

Discrimination, harassment and grievance mechanisms

HCLTech is committed to a workplace that is safe, inclusive and respectful, where all individuals are treated with dignity and fairness. This commitment is reflected in its Code of Business Ethics and Conduct, Human Rights Policy and Prevention of Sexual Harassment (POSH) Policy, which are publicly available and aligned with the UN Guiding Principles on Business and Human Rights and relevant ILO conventions. The company follows a zero-tolerance approach to discrimination and harassment, explicitly prohibiting all forms of sexual and non-sexual harassment, including bullying, intimidation and inappropriate conduct, with employment decisions across the lifecycle based on merit and business requirements.

These principles are reinforced through mandatory training and awareness programs for employees and leadership. Structured and accessible reporting mechanisms, including managers, Human Resources and the Global Ethics Helpline, enable confidential and, where permitted, anonymous reporting. All reported cases are subject to defined investigation processes and governance oversight and where misconduct is substantiated, appropriate disciplinary action is taken in accordance with company policies and applicable laws. The company discloses aggregate information on such cases as part of its public reporting.

Occupational health and safety

HCLTech maintains a structured approach to occupational health and safety (OHS) to support employee well-being and operational continuity. The OHS framework is guided by internal policies and management systems that are publicly available through the company’s corporate website and sustainability disclosures and are aligned with applicable regulations and internationally recognized standards, including ISO-based practices. These policies

apply across operations and cover employees, contractors and third parties under HCLTech’s supervision.

The framework is supported by defined governance structures and overseen by executive management through periodic reviews that monitor risks, track performance and drive continuous improvement. It incorporates risk prioritization, action planning and the establishment of targets to improve safety performance, with employee participation encouraged in identifying and addressing workplace risks.

OHS programs across offices and campus-based operations address ergonomics, workplace safety, emergency preparedness and psychosocial well-being. These include safety training, awareness initiatives, ergonomic interventions and emergency response drills, while contractor safety requirements are embedded into onboarding and contractual frameworks. Emergency preparedness is integrated into broader risk management and business continuity processes.

Performance is monitored through defined metrics and management reviews to evaluate progress in reducing workplace risks and improving health and safety outcomes



Enhancing workplace safety trainings through structured OHS programs

Zero

Fatalities and zero high consequence work related injuries in FY26

100%

Of employees covered under OHS policies and procedures

75%

Of employees covered by ISO 45001:2018 certified facilities

79.19%

OHS training completion

0.00659

Lost Time Injury Frequency Rate (LTIFR)

Incident Reporting

HCLTech has established a dedicated IMSHS (Incident Management–Occupational Health and Safety and Environment) digital tool accessible through its intranet portal, enabling employees to report incidents and access safety guidelines through the Enterprise Knowledge Management (EKM) platform. This platform supports the organization’s broader OHS management framework by strengthening hazard identification, risk assessment and incident tracking mechanisms.

Occupational Health and Safety trainings

To further embed a proactive safety culture, HCLTech has mandated Occupational Health and Safety (OHS) trainings for employees during the year 2025, delivered through e-learning modules on the enterprise learning portal i.e. iSuccess learning portal. These trainings aim to enhance awareness on workplace safety, ergonomics, emergency preparedness and regulatory compliance,

thereby ensuring that employees across global operations are adequately equipped to contribute to a safe and healthy work environment.

Hazard Identification, Risk Assessment and Incident Investigation

HCLTech conducts workplace inspections and periodic risk assessments to identify hazards, prioritize mitigation actions and strengthen preventive controls, with particular focus on ergonomics and knowledge-worker environments.

Incident reporting and investigation follow defined procedures enabling timely reporting, root-cause analysis and corrective action. Cases are evaluated through structured processes and escalated through governance channels. Corrective and preventive actions are tracked to closure, with effectiveness reviewed through management oversight.

Analysis of incident trends and safety indicators supports identification of systemic risks and prioritization of improvement actions, reinforced through internal inspections and audits. OHS requirements are integrated into procurement and third-party engagement processes. Regular training programs raise awareness and reduce workplace risks across employees and relevant external personnel.



Strengthening workplace safety through rigorous inspections, risk assessment and preventive action

Looking ahead

HCLTech will continue to deepen its people-centric approach by integrating talent, inclusion and well-being more closely with its business strategy and operating model. As the nature of work evolves, the company will scale investments in AI, generative AI and emerging technology capabilities, enabling employees to adapt to changing skill requirements and build long-term career resilience.

The company will further strengthen its skills-led talent ecosystem, expanding early-career programs, internal mobility platforms and enterprise-wide learning initiatives to build a future-ready workforce at scale. Continued focus on performance management and managerial capability will support transparent career progression, continuous feedback and development-led growth, enhancing employee experience and retention.

HCLTech will also advance its diversity and inclusion priorities, progressing toward its 2030 aspirations while strengthening inclusion across gender, disability, cultural and generational dimensions. In parallel, the Company will continue to enhance its holistic well-being ecosystem, including healthcare, mental well-being, caregiving support and employee engagement initiatives, to support a resilient and engaged workforce across geographies.

Alongside these priorities, HCLTech will reinforce its commitment to responsible employment practices, including human rights due diligence, safe working conditions and fair labor practices across its operations and value chain. Through these efforts, the company aims to strengthen a high-performance, inclusive and future-ready workplace that enables its people to create sustained value for clients, communities and the business.

Responsible Supply Chain and Human Rights

Acting responsibly across our value chain



Governance and policies

As a global technology services company operating across 60 countries, a significant share of HCLTech's environmental and social impacts reside across its supplier ecosystem. Our value-chain governance reflects that reality, built on public, mandatory

FY26 marks an important milestone in the evolution of HCLTech's responsible value-chain program. Sustainability expectations are now embedded across supplier onboarding, procurement governance, risk management and partner engagement. During the year, 100% of suppliers operated under our UNGC and ISO 20400-aligned Supplier Code of Conduct and Green Procurement Policy.

In addition, 76.4% of suppliers by business value were assessed through a third-party Sustainable Supply Chain Assessment platform covering environmental, human rights and business ethics criteria. We have also retained our CDP Leadership-band (A) rating for Supplier Engagement on Climate Change.

and externally validated policies, with clear lines of accountability from the Board to the procurement desk. Three policies form the core of our approach. All policies apply globally and form part of mandatory supplier governance requirements.

Supplier Code of Conduct based on the principles of the United Nations Global Compact (UNGC). Covers labor standards, human rights, health and safety, environmental management, business ethics and information security. Mandatory acceptance by every onboarded vendor.

Green Procurement Policy aligned with ISO 20400 Sustainable Procurement guidance and independently validated by a third party sets sustainability criteria for supplier selection, RFPs, e-bidding and contracting.

Human Rights Policy and Vendor Privacy and Information Security requirements extend our human rights and information security expectations to every value-chain partner.

These policies are reinforced by the Code of Business Ethics and Conduct and our Whistleblower mechanism, both of which apply to vendors, sub-vendors and contracted

personnel. Oversight sits with the ESG and DEI Committee of the Board, with operational accountability held by respective functions.

Integrating sustainability in our supply chain process

We have followed an end-to-end approach in integrating sustainability in our supply chain. It starts with vendor screening to vendor onboarding and continues during vendor engagement.

Vendor screening	ESG consideration in RFPs and supplier selection
Vendor onboarding	Performing Vendor Onboarding Assessment which follow a risk-based approach in the form of Level-1 checks followed by a detailed questionnaire including evaluation on ESG criteria
Vendor contract	• Inclusion of ESG clauses within supplier contracts to ensure alignment with HCLTech’s sustainability commitments • Standard PO Terms and Conditions incorporating governance and compliance expectations • Adherence to HCLTech’s Green Procurement Policy to promote environmentally responsible sourcing practices • Mandatory acceptance of the Supplier Code of Conduct, shared with all suppliers through governance channels, to ensure awareness, understanding and compliance with ethical, social and environmental standards
On-going engagement	• Capacity building of vendors on ESG and providing access to Resources • Vendor risk assessment on qualified existing vendors • On site assessments of select high risk vendors • Remediation plans shared with vendors and annual review of plans

Risk-based vendor onboarding and assessment

Every new vendor undergoes a structured Vendor Onboarding Assessment (VOA) where ESG criteria are embedded into the pre-qualification process. This assessment is mandatory for all new vendors onboarded following a risk-based approach.

100% of eligible new suppliers in FY26 were screened against ESG parameters under this framework, with adherence to the Supplier Code of Conduct and Green Procurement Policy established as a mandatory contractual requirement

- The Level 1 assessment is a desktop-based screening that assigns a high or low risk rating based on factors such as regulatory compliance, financial stability, ethical practices (including anti-bribery, corruption and fraud), ESG performance, litigation, sanctions exposure and information security or cyber risks. Vendors assessed as low risk are approved for engagement, while those flagged as high risk undergo a more detailed Level 2 assessment.
- Level 2 involves deeper due diligence, including clarifications on identified risks, detailed questionnaires, financial and policy reviews (including ESG, ethics and compliance

frameworks) and defined mitigation timelines. It also includes financial risk analysis and overall scoring to determine the vendor’s suitability.

All risk ratings and assessment reports are recorded, ensuring traceability and governance. This structured, two-tier approach strengthens transparency, enables informed decision-making and supports responsible vendor onboarding aligned with HCLTech’s sustainability commitments.

Beyond onboarding assessment, HCLTech conducts periodic, risk-based assessments across its supplier ecosystem. In FY26, the company advanced this approach by introducing a third-party Sustainable Supply Chain Assessment platform, shifting from internal questionnaires to an externally administered, evidence-based evaluation model. The platform assesses suppliers against:

- Labor standards and working conditions
- Human rights (including child and forced labor, freedom of association, fair wages and working hours)
- Health and safety
- Business ethics and anti-bribery
- Environmental management and sustainable procurement practices

The insights generated are used to drive corrective action plans, strengthen supplier engagement and enable continuous improvement. High-risk suppliers receive enhanced attention and audit findings are systematically fed back into the VOA framework to reinforce and improve future onboarding cycles. Suppliers demonstrating strong ESG performance are prioritized in sourcing decisions, while those with persistent non-compliance are subject to corrective actions or phased disengagement.

Human rights due diligence (HRDD) across the value chain

HCLTech’s value-chain human rights program is an ongoing journey that spans all eight core human rights elements, including:

- Child labor
- Forced labor
- Workplace discrimination
- Fair wages
- Health and Safety
- Working Hours
- Living wages
- Harassment/POSH

HCLTech integrates sustainability into its supplier selection process by evaluating suppliers on their Environmental, Social and Governance (ESG) practices, including human rights considerations. Sustainability expectations are embedded into Requests for Proposals (RFPs) for key categories. Final sourcing decisions are based on overall business merit.

Suppliers are required to ensure that any subcontractors engaged for HCLTech-related work comply with HCLTech’s Green Procurement Policy, which includes robust human rights requirements. They are also responsible for preventing any breaches of these standards within their extended supply chain.

To support this, HCLTech follows a structured Vendor Onboarding Assessment (VOA) process to evaluate new suppliers across key risk areas, including regulatory compliance, ethical practices and alignment with sustainability standards. This risk-based approach helps identify and manage potential onboarding

risks, ensuring that suppliers not only meet organizational requirements but also contribute positively to supply chain integrity and broader sustainability objectives.

These are assessed in alignment with globally recognized frameworks such as the Ethical Trading Initiative (ETI) Base Code, SA8000, the UN Guiding Principles on Business and Human Rights (UNGPs) and related UN business and human rights principles.

During FY26, a dedicated Human Rights Assessment was completed across both internal operations and the new vendor onboarding process. In addition, 76.4% of value-chain partners by business value were assessed against key criteria covering sexual harassment, discrimination, child labor, forced labor and fair wage practices.

HRDD is further strengthened by close monitoring of emerging regulatory expectations, including the EU Corporate Sustainability Due Diligence Directive (CSDDD), Germany’s Supply Chain Due Diligence Act (LkSG), ILO Core Conventions, OECD Guidelines and the UNGPs.

Sustainability remains integral to our supplier engagement strategy. ESG performance is systematically embedded into supplier selection and ongoing engagement, with a clear preference for partners aligned to our sustainability expectations. This approach not only strengthens risk management but also fosters long-term, value-driven partnerships grounded in shared responsibility and continuous improvement.

Indicator	FY26 status
Suppliers covered by Supplier Code of Conduct and Green Procurement Policy	100%
Newly onboarded eligible suppliers ESG-screened via VOA	100%
Value-chain partners assessed on human-rights criteria by value of business	76.4%
Value-chain partners assessed on health-and-safety practices	100% of major partners
Value-chain partners assessed on working conditions	100% of major partners
Suppliers covered under third-party Sustainable Supply Chain Assessment platform	Risk-based; high-risk suppliers prioritized
Supplier capacity building	1,134 supplier awareness training sessions conducted, establishing a strong foundation for continued expansion

Impacts, Risks and Opportunities (IROs)

HCLTech’s value-chain assessment identifies a set of material ESG topics that arise out of our DMA. These topics cut across upstream suppliers, internal operations, delivery ecosystems and downstream partners.

Supply chain impacts

- **Sustainable procurement and supplier ethics**
 - covering responsible sourcing, human rights protections and zero-tolerance for bribery and corruption.
- **Third-party privacy and cybersecurity**
 - ensuring privacy-by-design, secure development practices and zero-trust architectures across all vendor engagements.
- **Climate-related impacts**
 - particularly Scope 3 emissions arising from purchased and capital goods, professional services, logistics, business travel and cloud consumption.
- **Extended workforce well-being**
 - including DEI representation, fair and equitable pay, occupational health and safety and continuous skill development.
- **Operational resilience**
 - ensuring continuity of critical suppliers, delivery locations and high-availability service environments.

Supply-chain-linked risks

- **ESG non-compliance** – potentially leading to service disruption, contract exposure or reputational harm.
- **Low-quality or incomplete supplier carbon data** – impeding Scope 3 accuracy and transition-planning effectiveness.
- **Physical and transition climate risks** – including extreme weather events, regional disruptions and decarbonization-related regulatory shifts.
- **Third-party security and privacy vulnerabilities** – compounded by evolving cross-jurisdictional data protection regulations.

Value-chain opportunities

Supplier capability development is a strategic lever in advancing sustainability performance across our value chain. At HCLTech, our focus is on elevating supplier maturity and accelerating sustainable progress.

In FY26, we conducted various awareness and capability-building sessions that created a strong foundation to scale impact and deepen the integration of ESG priorities across our ecosystem. These efforts were further reinforced through structured programs for both suppliers and our procurement teams, with select sessions led by independent subject-matter experts to bring external rigor, specialized insight and enhanced credibility to our approach.

Our capability-building model is both structured and forward-looking:

- **Targeted ESG enablement:** Key suppliers are equipped with a comprehensive ESG manual and access to a dedicated learning platform covering emissions disclosure, human rights due diligence, circular economy practices and health and safety standards for on-site operations. Broader topics include GHG management, water and waste stewardship, workforce well-being, gender diversity and inclusive, fair business practices.
- **Digital-led sustainability:** We actively promote digital efficiency through cloud optimization, green software engineering and AI-driven carbon analytics, enabling measurable reductions in environmental impact.
- **Circularity at scale:** Suppliers are encouraged to adopt circular economy models, extending asset life cycles through refurbishment, reuse and responsible e-waste management.

Through this integrated, capability-led approach, HCLTech is not only strengthening supplier performance but also co-creating a more resilient, transparent and future-ready value chain.

How HCLTech responds to IROs

- **End-to-end Vendor Risk Management (VRM)** – incorporating risk-tiering, periodic audits, corrective and preventive actions (CAPA) and escalation pathways for persistent non-compliance.
- **Robust contractual safeguards** – mandating adherence to human-rights norms, anti-corruption commitments, privacy and security obligations, emissions data sharing and BCP/DR frameworks.
- **Supplier decarbonization engagement** – including targeted capability-building, digital sustainability scorecards and cloud-efficiency governance through FinOps practices.
- **Scenario analysis and resilience testing** – conducted with strategic partners to strengthen contingency readiness, supported by evidence repositories aligned to rating frameworks.

Digital traceability and supplier risk intelligence

HCLTech continues to strengthen its digital traceability and supplier risk intelligence capabilities to support more informed and accountable sourcing decisions. We leverage SAP Ariba and integrated sustainability scorecards, including platforms such as EcoVadis, to assess supplier performance, track corrective actions and help prioritize improvement and decarbonization pathways.

Building on this foundation, we have made meaningful progress by partnering with a third-party ESG subject-matter expert (SME) and deploying its digital ESG platform to enhance supplier data capture and visibility. Through this platform, we are now able to systematically capture and monitor Scope 1 and Scope 2 emissions data from suppliers, significantly strengthening our ability to understand emissions performance across the value chain.

This marks an important step in advancing our Scope 3 emissions management as improved visibility into suppliers’ operational emissions enables better tracking, more targeted engagement and more informed decarbonization planning. In parallel, supplier contracts are being progressively updated to include requirements related to emissions-data sharing and renewable-energy transition, further embedding sustainability expectations into supplier relationships and improving traceability across the ecosystem.

Together, these measures are helping us move from a predominantly disclosure- and assessment-based model to a more data-driven, action-oriented approach to supplier ESG management.

Inclusive sourcing and supplier diversity

HCLTech’s procurement strategy actively promotes inclusion by engaging small, local and under-represented suppliers, recognizing their role in strengthening both communities and supply chain resilience. In FY26, 20% of global procurement spend was directed to diverse suppliers, while in India, MSMEs and small producers accounted for 12% of procurement spend (up from 10% the previous year) and 90% of sourcing was local, up from 83% in FY25.

The platform assesses suppliers against labor standards and working conditions, human rights (including child and forced labor, freedom of association, fair wages and working hours), health and safety, business ethics and anti-bribery and environmental management and sustainable procurement practices.

Engaging the value chain on climate

HCLTech’s sustained CDP “A” rating for Supplier Engagement on Climate Change in FY26 reflects a long-term commitment to collaborating with suppliers to reduce Scope 3 emissions. Building on this foundation, the company has expanded engagement to

capture product-level emissions data for capital procurement, strengthening progress toward its SBTi-validated target of a 42% absolute reduction in Scope 3 emissions by FY30 against a FY20 baseline with an achieved 9.56% reduction in FY26.

With capital goods and employee commute representing the largest share of value-chain emissions, improving supplier data quality is central to enabling more accurate tracking and more meaningful decarbonization action. As transparency deepens, so does the ability to set clearer supplier-level targets, steadily closing the gap between reporting and real emissions reduction.

Capacity building and supplier engagement

In FY26, we conducted 1,134 supplier awareness training sessions, establishing a strong foundation for continued expansion.

A key focus of our FY26 approach was strengthening the ESG capabilities of the procurement team, recognizing that they are the first point of contact for suppliers and play a critical role in shaping supplier practices. By enhancing their understanding of ESG expectations and emerging sustainability priorities, we aim to enable the procurement function to take greater ownership in driving ESG performance across the supplier base and embedding these considerations more consistently into supplier interactions and decision-making.

For FY27, we are further strengthening buyer performance metrics to include ESG-linked outcomes such as Value Chain Assessment (VCA) participation, supplier diversity and training compliance.

We offer an ESG manual and a dedicated learning platform to our key suppliers, covering emissions disclosure, human-rights due diligence, circular-economy practices and the health and safety standards that govern work on our sites. Our engagement model is

designed to be layered and continuous. It includes ESG sessions for existing vendors, technical training for supplier engineers working across our data centers and campuses as well as root-cause analysis sessions where incidents or audit findings require joint problem-solving and corrective action.

We view capacity building as an ongoing partnership rather than a one-time awareness effort, with our procurement and sustainability teams working closely with supplier counterparts to continuously raise standards across the value chain. At the same time, we acknowledge that the depth and consistency of engagement vary across our supplier ecosystem and improving the uniformity and effectiveness of ESG capability-building across all partners remains a key priority for FY27.

Green Recognition Award

To further strengthen supplier engagement and reinforce shared accountability on sustainability, we introduced the Green Recognition Award at our annual supplier meet to appreciate and recognize our ESG Champions. The award celebrates suppliers and partners who have demonstrated strong commitment to ESG principles through proactive action, innovation and measurable progress across areas such as environmental stewardship, responsible business practices and social impact. By recognizing leadership and good practices within our supplier ecosystem, we aim to encourage wider adoption of ESG standards, inspire continuous improvement and build a stronger culture of sustainability across the value chain.

Grievance mechanisms for value-chain partners

HCLTech is committed to enabling its suppliers and partners to meet the highest standards of compliance, integrity and responsible business conduct. We actively encourage open dialogue and welcome feedback from all stakeholders to



continuously strengthen our policies and processes. Suppliers may raise any queries, concerns or grievances related to procurement policies at procurementconcerns@hcltech.com, where all submissions are reviewed and addressed in a timely and structured manner.

In parallel, HCLTech extends its robust Whistleblower Policy across the value chain, providing a secure and confidential channel for reporting any suspected violations of policies or code of conduct. Suppliers, employees and external stakeholders may report concerns via whistleblower@hcltech.com, with the option to remain anonymous. The policy clearly defines reporting protocols, investigation procedures and safeguards to ensure fairness, confidentiality and non-retaliation.

All complaints follow a defined investigation and resolution protocol. The investigation is led by independent functions and reported to the Audit Committee of the Board.

These mechanisms reflect HCLTech's commitment to transparency, accountability and ethical governance. By providing accessible grievance redressal channels, including a dedicated vendor support mechanism; we reinforce trust and uphold responsible practices across our global supplier ecosystem.

Statutory compliance

All applicable statutory dues, provident fund contributions, social-security obligations, minimum wages and statutory levies are deducted and deposited by our value-chain partners as a condition of doing business with HCLTech. Compliance is verified through the VOA process at onboarding and through periodic risk-based assessments thereafter, including review of statutory registers and labor-compliance documentation.

Looking ahead

The supply chain has moved, in a short span of years, from a topic on a materiality list to an integrated system with policies, platforms, assurance and measurable outcomes. The next stage is depth rather than breadth. Our future priorities are clear.

- Scale the third-party Sustainable Supply Chain Assessment platform from high-risk suppliers to the full tier-1 base and use the resulting product-level emission factors to upgrade Scope 3 reporting from limited to reasonable assurance.
- Operationalize CSDDD and LkSG readiness by strengthening value-chain due-diligence documentation, escalation pathways and grievance traceability ahead of regulatory effective dates.
- Increase the share of diverse-supplier spent from 20% globally, with particular focus on women-owned and MSME suppliers excluding geographies where such affirmative programs are not to be practiced.
- Deepen supplier capacity building on climate, human rights and circularity, moving from awareness to demonstrated outcomes.
- Expand independent assurance to cover Scope 3 supplier data and human rights value-chain disclosures at a reasonable assurance level.

At HCLTech, a responsible value chain is not a compliance overlay, it is how we extend our values, our standards and our climate ambition into every relationship that delivers our services.

Corporate Governance, Ethics and Transparency

Trust as our foundation



Trust is built through principled leadership, disciplined execution and unwavering accountability. At HCLTech, governance and ethics are embedded in every decision, reinforcing stakeholder confidence and long-term value creation. Recognition by Fortune, Ethisphere and leading ESG rating agencies including MSCI, S&P Global, Sustainalytics and EcoVadis reflects the strength of our governance framework and our commitment to transparency, integrity and responsible business excellence.

Awards and recognitions

HCLTech's governance and sustainability practices have been recognized by leading global rating agencies and institutions:

- 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

Corporate Governance

Corporate governance philosophy at HCLTech is anchored in five enduring principles that together describe how we expect to be seen by our investors, our regulators, our clients, our colleagues and the communities in which we operate.

- Corporate governance standards should go beyond the law. Comply with the laws of all the countries in which the Company operates and follow the spirit, not just the letter of the law.
- Have a simple and transparent corporate structure driven solely by business needs.
- Be transparent and maintain high degree of disclosure levels.
- Communicate externally, in a truthful manner, about how the company runs internally.
- Make a clear distinction between personal convenience and corporate resources.

These principles are reinforced through our policies:



Code of Business Ethics and Conduct (COBEC)



The Business Gift and Entertainment Policy (BGEP)



Anti-Bribery and Anti-Corruption Policy (ABAC)



The Anti-Money Laundering Policy



Whistleblower Policy



The HCLTech Group Tax Strategy



Conflict of Interest Policy



The Supplier Code of Conduct

Each one of these policies is periodically reviewed by the ESG & DEI Committee of the Board and made available to the public through our governance policies portal.

Board of Directors

The Board of Directors is HCLTech’s highest governing body. It sets strategy, oversees financial reporting and risk management and safeguards stakeholder interests. Details on Board composition, director profiles, attendance, evaluation and remuneration are provided in the Corporate Governance Section in the Annual Report (AR) FY26.

The overview of Board composition is available in ESG Performance Metrics.

Board size and composition

HCLTech follows a one-tier Board structure, comprising a mix of seven Independent Directors, 1 Executive Director and 2 Non-Executive Directors. HCLTech maintained industry leadership on Board gender diversity with 50% women Board members. The roles of Chairperson and Chief Executive Officer are separated, with the Chairperson serving in a non-executive capacity. This structure supports independent oversight and balanced governance of strategic decision-making.

The average tenure of Board Members is 5.46 years for Independent, non-executive directors.

Brief profiles of the Board members are available on our website at: hcltech.com/leadership.

Board committees

The Board operates through specialized committees under Board-approved charters: the Audit Committee, Nomination and Remuneration Committee, Stakeholders’ Relationship Committee, Risk Management Committee, Corporate Social Responsibility Committee, Finance Committee and ESG and DEI Committee. Details on composition, meeting frequency and attendance are available in ‘Details of Board Committees’ section of the AR FY26.

Board Independence

The Company believes that an active, well informed and diversified Board is necessary to achieve the highest standards of corporate governance. The Board of Directors (“Board”) of the Company has an optimum combination of Executive Director, Non-Executive Non-Independent Directors and Independent Directors. The composition of the Board is in conformity with Regulation 17 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time, (the “Listing Regulations”) and Sections 149 and 152 of the Companies Act, 2013, as amended from time to time (the “Act”).

As on March 31, 2026, HCLTech’s Board comprises **70% Independent Directors** (7 out of 10)

All Independent Directors meet the independence criteria prescribed under Section 149(6) of the Act and Regulation 16(1) (b) of SEBI LODR. Accordingly, the Company is in full compliance with applicable regulatory requirements and demonstrates strong governance standards by maintaining independence well above mandated thresholds.

Further in accordance with the provisions of Section 184(1) of the Companies Act, 2013, read with the rules made thereunder and Regulation 26 of the SEBI (Listing Obligations and

Disclosure Requirements) Regulations, 2015, all Directors of the Company have disclosed their concern or interest, direct or indirect, in other entities, including shareholding, by furnishing the declarations in the prescribed format. Such disclosures are obtained annually at the start of each financial year and whenever there is a change and are placed before the Board for its noting. The Company ensures maintenance of these disclosures as part of its robust corporate governance and transparency practices.

Compliance Statement for Independence of the Board of Directors

- The director must not have been employed by the company in an executive capacity within the last year.
- The director must not be a “family member” of an individual who is employed by the company or by any parent or subsidiary of the company as an executive officer.
- The director must have no personal services contract(s) with the company or be a member of the company’s senior management.
- The director must not have been a partner or employee of the company’s outside auditor during the past year.
- The director must not have any other conflict of interest that the Board determines to not be considered independent.

Target Share

The target/minimum requirement under Section 149 of the Companies Act, 2013, which requires at least one-third of the Board of a listed public company to comprise Independent Directors and Regulation 17 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, which requires at least 50% Independent Directors where the Chairperson is a non-executive promoter director or is related to the promoter/management as specified therein. HCLTech complies with the aforesaid regulatory requirements relating to Board

independence and maintains a proportion of Independent Directors that is higher than the aforesaid prescribed target/ threshold. As on March 31, 2026, HCLTech's Board comprised 10 directors, of whom seven were Independent Directors, representing 70% of the Board.

Board Accountability

HCLTech maintains a governance framework that ensures Board accountability through defined roles, oversight mechanisms and alignment with shareholder interests.

- In FY 2025-26, the Board convened eight meetings. The average **attendance** of the Directors was 96%, reflecting active participation, effective oversight and engagement from all directors. For further details on Board meetings and attendance, please refer to "Board Meetings and Attendance" section of the AR FY26.
- **Board appointments and tenure** are governed by statutory provisions and the Company's Articles of Association. Non-independent directors are subject to retirement by rotation, with one-third retiring at each Annual General Meeting and eligible for shareholder re-appointment. Independent Directors are appointed for defined terms of up to two consecutive periods of five years and are not subject to annual retirement. Refer to the AR FY26 for details.
- Leadership continuity is supported through formal succession planning processes, including for the CEO and senior management, overseen by the Nomination and Remuneration Committee. Refer to "Succession Planning" section of the AR FY26.
- Board effectiveness is assessed through an annual performance evaluation covering the Board, its committees and individual directors. HCLTech conducted its **annual Board performance evaluation** in compliance

with the Companies Act, 2013 and SEBI Listing Regulations, using a structured framework approved by the Nomination and Remuneration Committee (NRC). The evaluation covered the Board, its Committees, the Chairperson and individual Directors, with focus areas including composition, effectiveness, participation and leadership. Refer to "Board Evaluation" section of the AR for more details.

- All independent and non-executive directors have four or less directorships in Indian public listed companies as on March 31, 2026.
- The limit on the directors' personal liabilities is to the extent stated under the Companies Act, 2013.
- Shareholders' approvals via special resolution are obtained for any changes in the Bylaws of the Company viz. Articles of Association.

Management Ownership

HCLTech recognizes that equity ownership by senior leadership is an important mechanism to align management interests with those of shareholders and to reinforce long-term value creation. The compensation framework includes share-based components that support ownership alignment over time, while also ensuring that executive risk exposure remains directly linked to shareholder outcomes.

As on March 31, 2026, the shares held by Key Managerial Personnel (KMPs) are as follows:

C. Vijayakumar (CEO and Managing Director) held 15,23,755 shares valued at 3.67 times base salary. Shiv Walia (CFO) held 3,237 shares valued at 0.08 times base salary and Manish Anand (Company Secretary) held 41760 shares valued at 5.83 times base salary.

Management Ownership requirements

The Company Restricted Stock Units (RSUs) Plans have an objective to align the incentives of the management more closely with the interest of the members, to enable the Company to attract good leadership talent, to align the compensation packages of leadership team in line with our peers and to help retain people for a longer period.

A significant component of remuneration for the CEO and Managing Director and other senior executives comprises such RSU grants, which vest over multi-year periods, thereby encouraging sustained performance and retention. Senior management and KMPs progressively build equity ownership in the Company through these long-term incentives, linking their rewards to overall Company performance and value creation. The vesting structure and grant framework are periodically reviewed by the Nomination and Remuneration Committee, considering business performance, market practices and regulatory requirements.

Government and Family ownership

HCLTech maintains a transparent ownership structure, with shareholding details publicly disclosed through its Annual Report and regulatory filings. The Company does not confer any special governance rights or privileges, such as golden shares, to any shareholder, including governmental institutions.

As of March 31, 2026, Life Insurance Corporation of India (LIC), a government-owned entity, holds 6.97% of the Company's equity share capital, representing an instance of indirect government ownership. LIC's stake consists of ordinary equity shares acquired through market transactions and does not entail any preferential rights or influence beyond standard voting privileges available to all shareholders.

HCLTech also has significant promoter/family ownership. The aggregate shareholding of

Ms. Roshni Nadar Malhotra along with her family members, held directly and indirectly, stands at 44.226% of total voting rights. In addition, HCL Holdings Pvt. Ltd. holds 16.46% of the Company's equity shares. The shareholding in HCL Holdings Pvt. Ltd. is held through the Vama Sundari Trust, a discretionary trust established by Ms. Roshni Nadar Malhotra. As the trust is discretionary in nature, the beneficial interest of individual beneficiaries has not been determined or crystallized as of the reporting date.

This ownership structure reflects a combination of institutional and promoter shareholding, supporting both market participation and long-term stewardship, while maintaining equal voting rights and governance standards across all shareholders.

CEO Compensation

The variable component of the CEO compensation is linked to clearly established performance criteria and is delivered through a combination of Annual Performance Linked Bonus, Long-Term Incentives (LTI) and Restricted Stock Units (performance- and/or tenure-based).

Financial performance indicators form a core component of variable compensation and include metrics such as revenue growth, earnings before interest and tax (EBIT), net profit and free cash flow. These indicators are complemented by relative financial metrics, including Total Shareholder Return, to assess performance in comparison to market and peer benchmarks.

In addition to financial measures, the framework incorporates a balanced set of non-financial and strategic parameters, including execution of key strategic priorities, personal key performance parameters (KPPs), client satisfaction, ESG-related outcomes and diversity objectives. This integrated approach

ensures that the CEO compensation is aligned not only with short-term financial performance but also with long-term value creation and broader stakeholder interests.

Performance bonus is payable at the end of each financial year, basis achievement of targets against Key Performance Parameters. The longest period covered by the executive compensation plan for variable CEO compensation is 4.75 years that is granted in the form of performance based RSUs. Equity-based compensation is subject to defined vesting schedules, with the maximum vesting period extending up to 4.58 years, ensuring alignment with long-term shareholder value. The total annual remuneration of the CEO and Managing Director for FY26 was USD 18,126,813. This is 291.9 times* the median annual remuneration of employees.

Additional details, including RSU vesting terms and compensation structure, are disclosed in the AR FY26.

ESG governance architecture

HCLTech has established a structured governance framework to ensure formal oversight and accountability for ESG and sustainability matters at both Board and executive levels. This framework integrates ESG considerations into strategy, risk management and enterprise decision-making, supported by clearly defined roles and governance bodies.

The Board oversees ESG strategy and performance through the ESG and DEI Committee, while the Executive Leadership advances the agenda, decision-making and strategic planning. An executive-level ESG oversight mechanism operates alongside the executive leadership team and the sustainability function, enabling coordinated decision-making and implementation of ESG priorities across the organization. This includes regular review of progress on sustainability goals, including climate targets and alignment of business

practices with external commitments such as the Paris Agreement.

The Global Head of Sustainability reporting to the CEO office is responsible for delivering the corporate sustainability strategy supported by a global team of sustainability professionals and experts. This function operates in close coordination with the adjacent functions – HR, GWS, Company Secretary, Risk and Compliance, Procurement, etc. and provides regular updates to the ESG & DEI Committee and executive leadership.

ESG and DEI Committee of the Board

The ESG & Diversity, Equity and Inclusion (DEI) Committee is responsible for overseeing the company’s sustainability agenda alongside its commitments to building an inclusive and equitable workforce. Its mandate covers strategic direction, risk oversight, governance and performance tracking across environmental, social, governance and workforce inclusion priorities. The committee ensures that ESG considerations are embedded into business strategy, while DEI principles are operationalized through structured policies, measurable programs and leadership accountability.

The committee meets quarterly to review ESG and DEI progress of the company.

Key responsibilities

Environmental, Social and Governance (ESG)

ESG Risk and Opportunity Oversight

- Review emerging ESG risks and opportunities impacting business performance and reputation, including:
 - Environmental: emissions, climate change, energy transition, GHGs, carbon pricing
 - Social: employee relations, diversity and equality, human rights, societal impact
 - Governance: board practices, disclosures, regulatory changes, shareholder considerations

ESG Strategy and Integration

- Approve short-term and long-term ESG/ sustainability strategy
- Ensure integration of ESG into overall business strategy
- Approve annual ESG goals, metrics and targets
- Assess performance against defined metrics and standards

ESG Disclosures and Stakeholder Engagement

- Guide management on ESG disclosures across:
 - Annual reports
 - Website and public documents
- Oversee engagement with stakeholders and shareholders on ESG topics

Reporting and Compliance (BRSR)

- Review Business Responsibility and Sustainability Reporting (BRSR)
- Evaluate initiatives aligned to the nine BRSR Core principles
- Recommend ESG disclosures to the Board for approval

Governance of ESG Function

- Appoint external advisors where necessary
- Periodically review and update ESG and DEI committee charter

Diversity and Inclusion (D&I)

Gender Diversity

- Support progression of women into senior roles
- Ensure fair representation of women in hiring processes
- Ensure fairness in:
 - Promotion
 - Compensation
 - Rewards
 - Leadership development

- Build leadership pipeline to achieve balanced gender ratios across all levels
- Address bias in talent review and succession planning

Culture and Ethnicity

- Measure culture through defined cultural indicators
- Promote inter-cultural competence
- Enable effective leadership transitions
- Create a culturally diverse and balanced workforce
- Empower individuals from diverse ethnic and cultural backgrounds

Inclusion of Individuals with Disabilities

- Ensure non-discrimination and recognition of diversity of people with disabilities
- Include inclusive language in job postings and identify suitable roles
- Implement inclusive global policies
- Provide specialized training for an accessible workplace
- Track and monitor employment of individuals with disabilities on a quarterly basis

Inclusion and fair treatment

HCLTech maintains an inclusive, non-discriminatory workplace with ongoing monitoring of diversity metrics, gender representation and pay equity. Reported discrimination incidents are addressed through established mechanisms. The ESG and D&I Committee provides strategic oversight on inclusive workplace practices, including diversity and inclusion, strengthening ESG governance by overseeing key social topics and promoting responsible business practices across the organization.

*Calculated using Purchasing Power Parity (PPP) factors to compare global salaries across countries.

Policy framework

HCLTech maintains an enterprise-wide policy framework encompassing sustainability, ethics, human rights, data privacy, cybersecurity, governance and employee well-being. These policies are developed with inputs from key internal stakeholders, including functions such as HR, Legal, Compliance, Sustainability and Risk, ensuring that diverse perspectives are integrated into policy design and updates.

The policies are subject to structured review and validation and are governed through Board-mandated oversight, including the Policy Review Board (PRB), ensuring alignment with strategic priorities and risk management objectives. Implementation is further supported through defined processes, training and integration into operational practices across business units and functions.

Code of Business Ethics and Conduct (COBEC)

The Code of Business Ethics and Conduct ("COBEC") is HCLTech's core code for day-to-day ethical conduct. It applies to all employees, officers and directors across the company and its affiliates worldwide. COBEC sets out our zero-tolerance stance on fraud, bribery, corruption and other unethical conduct and requires everyone to act with integrity, raise concerns and protect stakeholder trust.

COBEC also sets principles on non-discrimination and equal opportunity, confidentiality, conflicts of interest, antitrust and fair competition, insider trading and market abuse, anti-money laundering and environment, health and safety. These principles apply across the workforce and are reinforced through supporting policies and procedures.

COBEC is Board-approved and published on the Governance Policies webpage on the HCLTech website: <https://www.hcltech.com/investor-relations/governance-policies/cobec>

COBEC is reinforced through mandatory annual training. It is supported by the Conflict of Interest, Business Gift and Entertainment, Anti-Money Laundering and Anti-Bribery and Anti-Corruption policies, along with policies on information security, data privacy, fair competition and insider trading. Together, these reinforce HCLTech's commitment to safe workplaces and responsible business conduct.

Anti-Bribery and Anti-Corruption (ABAC)

HCLTech maintains a zero-tolerance position on bribery and corruption. The Anti-Bribery and Anti-Corruption ("ABAC") policy sets out this position unambiguously and operates within the framework of the United States Foreign Corrupt Practices Act (FCPA), the UK Bribery Act (UKBA), the Indian Prevention of Corruption Act and equivalent legislation in every jurisdiction in which we operate. The policy also provides clear guidance on acceptance and provision of gifts and entertainment, political contributions and charitable contributions or sponsorships, ensuring that such activities are conducted transparently, within defined thresholds and in compliance with applicable laws and internal approval protocols. The ABAC policy is approved and endorsed at the Board level, reinforcing the Company's commitment to ethical business conduct across all operations.

Anti-Bribery Management System (ABMS)

Our ABAC controls are operationalized through a certified Anti-Bribery Management System (ABMS), aligned with ISO 37001:2016. The ABMS is audited annually by the British Standards Institution (BSI) and covers 100% of our operating sites. ABMS performance is monitored on a quarterly cycle through the ABMS Quarterly Compliance Certification (ABMS QCC), a formal attestation submitted by senior leaders across business units, support functions and geographies.

Any breach of the ABAC Policy is subject to investigation through established procedures

and may result in corrective and disciplinary action, including termination of employment where applicable. During FY26, there were no fines, penalties or actions imposed by regulators, law enforcement agencies or judicial institutions on cases of corruption or conflict of interest at HCLTech. There were nine cases of breach of code of conduct for Corruption/Bribery against employees.

Anti-bribery and anti-corruption awareness and training are mandatory for employees and are delivered periodically to reinforce expected standards of conduct and ensure effective implementation of the ABMS framework. <https://www.hcltech.com/investor-relations/governance-policies/cobec>

Fostering a culture of ethics

While compliance training is necessary, it is not sufficient on its own. We invest deliberately in building a culture of ethics that runs deeper than policy text. Four programs underpin this work:

- People managers' ethics toolkit, equipping line managers with the resources they need to lead ethical conversations within their teams.
- Ethics Champions network, an internal community of colleagues who serve as approachable points of contact for ethics queries across our business units and geographies.
- In-person ethics training – the annual Conscious Choices Ethics Event, anchoring our commitment to engagement that goes beyond e-learning.
- COBEC policy is discussed with new joiners during induction and acquired entities are brought under the COBEC framework promptly.

Whistleblower Policy

Our Whistleblower Policy provides every stakeholder, including employees, value-chain partners, shareholders and members of the public, with confidential and accessible

channels to raise concerns about suspected unethical conduct. Reports may be made through the Global Ethics Helpline, available on a 24x7 basis, or directly to whistleblower@hcltech.com. Employees based in Germany/Netherlands can continue to raise their concerns and grievances by emailing to whistleblower@hcltech.com. The Global Ethics Helpline allows for anonymous submission of concerns, where permitted by local regulations and is supported by independent third-party mechanisms to ensure impartial handling of reports. Awareness on the use of the reporting channels and whistleblowing procedures is reinforced through periodic ethics and compliance training programs and communication.

The whistleblowing mechanism is governed by a defined governance structure, with the Ethics Committee responsible for oversight, review and resolution of reported concerns. For more information, refer to AR FY26.

Stakeholder grievance redressal

At HCLTech, we believe that integrity, transparency and trust are the foundation of a strong workplace culture. That's why we prioritize a fair and responsive grievance resolution process – one that not only addresses concerns but also drives continuous improvement.

The company also offers a 24x7 Global Ethics Helpline for reporting a matter related to unethical behavior or violation of our code of conduct, policies, or procedures. This can also be reported to whistleblower@hcltech.com. The company is subject to annual internal and external audits carried out by external agencies.

In FY26, we ensured workplace issues are resolved promptly and effectively, reinforcing our commitment to ethical conduct and responsible governance at every level of the organization. During the year, the company received 101 stakeholder complaints including

whistle blower complaints and 79 of them were resolved.

The breakup of complaints is available in the BRSR section of AR FY26.

Memberships and associations

HCLTech engages with industry associations and multi-stakeholder platforms to advance its sustainability priorities and support responsible business practices. HCLTech is part of 43+ trade and industry chambers/associations, such as Confederation of Indian Industry (“CII”), National Association of Software and Service companies (“NASSCOM”), Confederation of British Industries (CBI), World Economic Forum (WEF), to name a few.

As proud signatories of the UN Global Compact (UNGC), we are committed to aligning our operations and strategies with the UNGC’s ten principles, which encompass human rights, labor standards, environmental protection and anti-corruption efforts.

In FY26, HCLTech contributed over US\$1 million in membership fees to leading industry and trade associations. These organizations support business engagement, represent industry perspectives in policy discussions and facilitate dialogue with regulatory and governmental bodies. Key contributions during the year included memberships with the World Economic Forum (US\$682,000), USISPF (US\$100,000), NASSCOM (US\$73,000), USIBC (US\$50,000), UNGC (USD 25,000) and WRC (USD 30,000). HCLTech maintains a strictly apolitical stance, making no contributions to political entities.

While these engagements enable industry collaboration and policy advocacy, HCLTech does not participate in lobbying activities, maintaining a clear distinction between stakeholder engagement and direct policy influence. Further details on the Company’s industry memberships are available in the AR FY26.

Climate Alignment

HCLTech follows a structured governance approach to align its stakeholder engagement, including participation in trade associations, with its climate commitments under the Paris Agreement. Oversight is provided through an executive-level ESG governance framework, supported by committees such as the ESG and DEI Committee, which periodically reviews progress on sustainability priorities, including greenhouse gas emissions reduction targets.

The Company’s policy engagement is guided by its commitment to achieving net-zero emissions by 2040, with interim targets aligned to a 1.5°C pathway and validated by the Science Based Targets initiative (SBTi). HCLTech is a signatory to The Climate Pledge and its climate strategy is supported through initiatives such as partnerships with Project JOULE for EV charging infrastructure and collaboration with ChargePoint to advance digital solutions for electric mobility.

HCLTech actively engages with global and industry platforms, including the WEF, UNGC, NASSCOM and other industry associations, to contribute to discussions on climate policy and responsible business practices. The Company continues to participate in global initiatives such as the UN Global Compact and the Water Resilience Coalition (WRC), contributing to broader efforts addressing climate change and water stewardship including commitments to rejuvenate the Yamuna river basin in India. The river has a total catchment area of 366,223 km² spread over seven northern states. The Water Resilience Coalition is committed to reducing water stress by 2050 and aims to elevate action on mounting water stress and its connection to climate change to the top of the global corporate agenda.

At the group level, we support climate and water stewardship initiatives through programs such as the HCL ClimaForce Fund, an initiative funded by HCL Group and managed by India

Climate Collaborative to promote low carbon innovation. Through the Aquapreneur Innovation Initiative, HCL Group partnered with UpLink, the early-stage innovation ecosystem of the World Economic Forum and its food and water Initiative, committing CHF 15 million over five years to build a first of its kind innovation ecosystem for the global freshwater sector.

Public policy engagement and trade association memberships are reviewed as part of the Company’s ESG governance processes to assess alignment with its climate commitments. The Company continues to strengthen its processes to systematically assess and address potential misalignment between the climate positions of trade associations and its own commitments under the Paris Agreement.

Risk management

HCLTech’s Enterprise Risk Management (ERM) program is grounded in internationally recognized frameworks, including ISO 31000:2018 and COSO and adopts a structured approach to identifying, assessing and managing risks across the organization. The ERM framework incorporates a comprehensive risk assessment process supported by PESTLE analysis, enabling evaluation of internal and external risks across political, economic, social, technological, legal and environmental dimensions.

Risk Governance and Oversight

HCLTech’s risk governance framework integrates



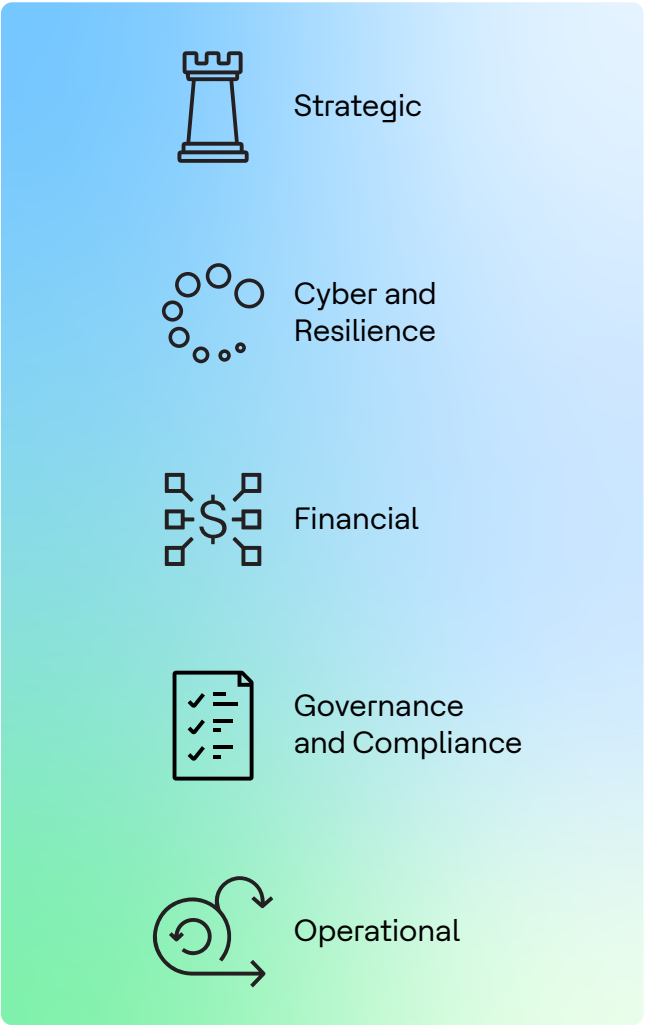
risk management with business strategy and operations, supported by defined roles, accountability structures and oversight mechanisms. The Board of Directors, through its Risk Management Committee and Audit Committee, provides oversight of enterprise risks and guides the Company’s risk strategy, policy framework and key risk assessments. At the enterprise level, the Risk and Compliance Apex Committee (RCAC), supported by the Chief Risk Officer and a cross-functional working group, provides oversight on risk management practices, sets control standards and monitors risk exposure across the organization. At the operational level, business and functional leaders act as risk owners, responsible for identifying, assessing and mitigating risks within their respective areas and ensuring effective implementation of control measures. Independent assurance is provided through the internal audit function, which evaluates the effectiveness of risk management and compliance processes and reports findings to the Audit Committee.

With ESG considerations fully embedded in enterprise risk management and audit frameworks and supported by regular reviews and Quality Control and Compliance mechanisms, HCLTech ensures a transparent, accountable and resilient risk management system aligned with global best practices. This multi-layered governance approach enables consistent risk identification, monitoring and mitigation, while ensuring accountability across management and alignment with the Company’s risk appetite and strategic priorities.

For more details, please refer to AR FY26.

HCLTech’s Risk Universe

HCLTech classifies its risk universe into five principal categories:



The primary risks within each category along with their respective mitigation measures are available in the AR FY26. The risks are identified based on their likelihood and potential impact, enabling prioritization of mitigation actions and informed decision-making across business operations.

Material ESG Risks

Our material ESG risks flow from the material sustainability topics as identified in the DMA. The material sustainability topics are:

- **Climate Change, Net Zero and Energy Transition**
- **Eco-Efficiency and Responsible Resource Management**
- **People – Talent, Inclusion and Well-being**
- **Responsible Supply Chain and Human Rights**
- **Client Data Privacy and Information Security**
- **Responsible Innovation and Digital Inclusion**
- **Corporate Governance, Ethics and Transparency**
- **Cybersecurity and Operational Resilience**
- **Community Impact and Inclusive Growth**

Each material risk is owned by an accountable executive, with mitigation actions tracked through our integrated risk register.

Enterprise Risk Management (ERM) framework

HCLTech’s ERM Framework comprises five interconnected components:

- **Governance and Culture:** Governance sets the tone and oversight for enterprise risk management, while culture reflects ethical values, expected behaviors and risk awareness.

- **Review and Revision:** Performance is reviewed over time and in light of significant changes to assess how well ERM is functioning and what revisions are needed.
- **Information, Communication and Reporting:** ERM depends on the continuous flow of relevant information from internal and external sources across the organization.

The following **key considerations** are integrated into the Risk Management process:

Integration into business decision-making: Risk considerations are embedded into key business processes, including the design and delivery of products and services, ensuring alignment with defined risk appetite and long-term value creation.

Embedded risk review: Risk review is integrated into the ERM framework, providing a holistic view of key risks and opportunities across material topics, including their mitigation actions and financial impacts, with Board-level oversight. Risk exposure is reviewed every quarter across five principal categories and insights shared with leadership and relevant committees to support informed decision-making.

Strong ESG oversight: The Board oversees ESG strategy and performance through the ESG and DEI Committee. ESG considerations are embedded into internal audit processes, with findings reviewed by the Audit Committee.

Defined risk appetite: The Board and Risk Management Committee set and oversee our risk appetite framework, establishing clear boundaries, key risk indicators and tolerances to guide consistent and responsible decision-making. The Risk Appetite Framework includes an enterprise-level statement and category-specific statements for the five principal risk categories, all approved by the Board.

Specialized risk management functions:

Dedicated risk teams across areas such as Risk and Compliance (R&C), Business Assurance, Operational Risk Management, Regulatory Affairs, Global Privacy Office, Vendor Risk Management, Business Continuity Management, Information and Cyber Security enable focused identification and mitigation of risks across operations.

Periodic risk assessment process: Risks are formally assessed on an annual basis, with quarterly reviews for key risk areas, ensuring timely identification of emerging risks and alignment with evolving business conditions. Risk assessments are conducted using a combination of quantitative and qualitative approaches, including evaluation of likelihood, impact and velocity, to support prioritization and reporting.

Independent assurance: Our internal audit function regularly evaluates the effectiveness of risk identification, mitigation and monitoring processes, ensuring alignment with global best practices. Internal and external audits of the Risk Management processes are carried out regularly.

Managing emerging risks: HCLTech employs a structured Horizon Sensing capability as a forward-looking component of its enterprise risk management framework to identify, monitor and assess emerging risks and opportunities that could impact its business, stakeholders and long-term value creation. The process involves continuous scanning of external and internal developments across regulatory, technological, cybersecurity, privacy, environmental, social, economic, geopolitical and market domains, as well as evolving stakeholder expectations and industry trends.

Risk-aware culture: We actively promote a culture of risk awareness through leadership engagement, mandatory training, awareness programs and simulations, enabling employees to identify and respond to risks effectively.

Risk management updates and training are periodically provided to the Board and Non-Executive Directors, enabling effective oversight and informed decision making on key risk areas.

Information Security and Data Protection

As a global technology services partner, protecting client data and our own information assets is foundational. Furthermore, HCLTech abides by the highest standards with regards to personal data processing. HCLTech continually enhances its information security and data protection practices leveraging leading industry methodologies, the NIST framework, as well as applicable standards and regulations, emphasizing awareness, real-time threat detection with AI technologies and protection of confidential data as well as critical operations. A defense-in-depth model and structured governance ensures internal and external risk management.

Governance

Cybersecurity and data privacy at the executive level are overseen by the Chief Information Security Officer (CISO) and Chief Privacy Officer (CPO), respectively. Board-level oversight is exercised through the Audit Committee and the Risk Management Committee.

HCLTech has appointed Heward Mill Limited as its independent Data Protection Officer (DPO). The DPO conducts annual audits of our global privacy program and provides direct assurance to the Board, reinforcing accountability and transparency in how we manage personal data.

This is supported by a network of cybersecurity and privacy champions across business units. These champions help embed security and privacy best practices across the organization, with quarterly reviews covering regulatory updates and emerging cybersecurity and privacy risks.

This remit supports our Cybersecurity and Data Privacy Mission to build a strong, best-in-class security and data protection ecosystem that sustains trust with employees, clients and stakeholders.

Information Security

- Our Information Security Management System (ISMS) is ISO 27001:2022 certified, supported by comprehensive policies and annually validated through independent third-party audits. Regular internal and external audits strengthen cybersecurity maturity and resilience in a dynamic threat landscape.
- A robust Continuous Threat and Exposure Management (CTEM) framework is in place, incorporating advanced techniques such as Red, Blue and Purple Teaming, DevSecOps, breach simulations, routine vulnerability assessments, penetration tests and cyber simulations such as phishing simulations, ensuring proactive identification and mitigation of emerging cyber risks.
- A 24x7 Cyber Defense Center ensures real-time threat monitoring and response.
- The Information Security (InfoSec) policy has been developed to support an effective Information Security Management System (ISMS) and aligns with relevant industry standards and widely recognized best practices. The policy is hosted on the HCLTech’s internal portal and it is accessible to all HCLTech employees, third parties and contractors.

Data Privacy

HCLTech upholds the highest standards of data privacy, aligning with global regulations through a centralized governance model led by the Chief Privacy Officer, regional Privacy Officers and the Group Data Protection Officer. This structure ensures a business-aligned and consistent approach to privacy management.

100% of our Corporate enterprise IT infrastructure and information security management system is compliant with the NIST Cybersecurity framework

Horizon Sensing

HCLTech applies Horizon Sensing as a forward-looking approach to identify and assess emerging developments that could influence data privacy and cybersecurity practices. This includes continuous monitoring of regulatory landscapes, technological innovations and evolving threat vectors. The insights gathered through this process drive timely updates to internal policies, risk frameworks and compliance strategies.

Our enterprise privacy and data protection framework is supported by ‘privacy by design’ principles and essential controls. The privacy program requires all processing activities, technologies and tools to be lawful and comply with a defined set of privacy principles.

Privacy governance includes documented policies and integrated processes embedded within enterprise risk and compliance systems. These are reinforced through privacy impact assessments, data mapping, third-party due diligence and incident management protocols.

HCLTech safeguards the privacy of clients, employees and third-party data. Client data is processed only in line with contractual obligations and applicable data protection laws and is used solely for the delivery of agreed-upon services, with no secondary or unauthorized purposes, reinforcing trust and transparency across geographies and service lines.

Privacy Trust Center

The Privacy Trust Center on our corporate site provides transparency on our data handling practices for clients, candidates and partners. It reinforces trust through transparent access to our privacy practices, data protection commitments and information on exercising privacy rights.

Privacy Statement

HCLTech’s Global Privacy Statement defines the organization’s mandate for personal data processing as both a controller and a processor. It requires all processing to be lawful and aligned with core privacy principles, including purpose limitation, necessity and proportionality, data minimization, security and storage limitation.

Training programs

HCLTech requires all employees, new joiners, vendors and contractors to undergo mandatory training on Information Security, Data Privacy, Business Ethics and Export Compliance. Through these trainings, HCLTech ensures that all the employees are equipped with the knowledge and skills necessary to protect sensitive data and systems for potential threats. Annual refreshers and continuous awareness efforts maintain ongoing vigilance.



Building a culture of security through continuous learning and awareness

Cybersecurity training reached every employee and was reinforced through targeted role-based modules for engineering, support and client-facing colleagues. Awareness is reinforced through phishing simulations, targeted training, compliance tracking and ongoing communication—including Cybersecurity Awareness Month, interactive content, leadership messages and threat alerts fostering a strong, organization-wide security culture.

Business Continuity plans

HCLTech’s Business Continuity Plan, led by the Chief Risk Officer, ensures business continuity and resilience during disruptions, with a strong focus on protecting employees, clients and stakeholders. Aligned with ISO 22301 and global best practices, it enables swift response and recovery for critical operations

Escalation and Accountability

HCLTech has implemented governance and accountability measures to support effective implementation of its Privacy Policy, including clearly defined reporting and escalation mechanisms and appropriate corrective actions for confirmed instances of non-compliance, reflecting a zero-tolerance approach to privacy violations.

Incidents can be reported through the Incident Management Portal, email or automatically via the Security Incident and Event Management (SIEM) tool. All reports are promptly acknowledged by the Incident Response Team and assigned investigation levels (L1–L3) based on severity, enabling timely triage and remediation. A defined service- and asset-level escalation matrix supports resolution within stipulated SLAs. Employees can also raise concerns through transparent reporting channels, including managers, HR and the whistleblower mechanism.

To reinforce accountability, information security compliance is built into employee performance management. Failure to complete mandatory training on time may lead to disciplinary action, including delays in compensation-related processes, subject to local regulations. Policy violations are addressed based on severity and applicable laws.

Reporting on breaches

There were no material, client-impacting security breaches reported during FY26. Details are available in ESG Performance Metrics.

Certifications

- ISO 27001:2022, Information Security Management System, certified by Bureau Veritas.
- ISO 27701:2019, Privacy Information Management System, certified by Bureau Veritas.
- ISO 22301, Business Continuity Management System, certified by Bureau Veritas.
- SOC 2 attestation by Grant Thornton.
- Cyber Essential Plus certification by Sophlee Limited.
- Cybersecurity program aligned with the NIST Cybersecurity Framework (CSF).
- Privacy program aligned with the GDPR requirements and the NIST Privacy Framework.
- Binding Corporate Rules (BCRs) documented and under regulatory approval with EU and EEA data protection authorities, covering both controller and processor roles.

Tax transparency

Tax governance at HCLTech is anchored in the HCLTech Group Tax Strategy, published on our corporate site and overseen by the Board through the Audit and Risk Management Committees, which regularly review significant tax issues, audits and litigations. A quarterly tax compliance certificate, internally and externally

audited, is presented to the Board and committees. The Chief Financial Officer (CFO) is responsible for the company’s tax strategy, risk management and governance. A global tax team, supported by external advisors, manages daily operations. Compliance is monitored through a tracking system with early warning mechanisms, ensuring timely updates to the Audit Committee.

Our approach is to follow tax laws in both letter and spirit, to pay the right amount of tax in every jurisdiction in which we generate value and to be open about how and where we do so.

Approach to tax

- **Compliance-led:** we comply with all applicable tax laws and regulations in every country in which we operate.
- **Transparency by design:** we provide tax-related disclosures in our financial statements, in our ESG Performance Metrics and through Country-by-Country Reporting (CbCR) filings.
- **No artificial structures:** we do not use tax havens or aggressive tax planning structures to reduce our effective tax rate.
- **Aligned to OECD:** our transfer pricing arrangements follow OECD Guidelines, the G20 and OECD Principles and the OECD BEPS framework.
- **Advance certainty:** where available, we use Advance Pricing Agreements (APAs) to provide certainty for both tax authorities and the business.

Please refer to ESG Performance Metrics for Effective Tax Rate.

Tax Reporting

Detailed tax disclosures, including the effective tax rate, cash taxes paid, jurisdictional profit before tax and CbCR filings in line with Form AOC-1, are presented in the Consolidated Financial Statements and the Tax Strategy section of the AR FY26 as well as in the ESG Performance Metrics.

Looking ahead

Our future governance priorities build on the foundations described above. We will continue to deepen the integration of ESG oversight into core Board agenda items, complete the EU and EEA approval of our Binding Corporate Rules, extend ABMS coverage to newly acquired entities within the timelines prescribed by ISO 37001:2016, refresh COBEC and the Whistleblower Policy in line with evolving regulatory expectations and expand Supplier Code of Conduct compliance across a broader share of our value chain by spend. Across all of these workstreams, our objective remains constant: to operate to a standard of integrity that earns and keeps the trust of every stakeholder.

At HCLTech, governance is not a compliance exercise. It is the architecture through which we honor our promises to our investors, our regulators, our clients, our colleagues and the communities we serve.