

August 2, 2023

The General Manager  
**BSE Limited**  
Corporate Relationship Department  
Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai- 400 001

The Manager  
**National Stock Exchange of India Limited**  
Listing Department  
Exchange Plaza, 5th Floor, Plot No. C-1, Block-G  
Bandra-Kurla Complex, Bandra(E)  
Mumbai-400 051

**BSE Scrip Code: 532281**

**NSE Scrip Code: HCLTECH**

**Subject: Clarifications w.r.t. Business Responsibility and Sustainability Report (“BRSR”) filing under Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR Regulations”)**

Dear Sir/ Madam,

This is with reference to the BRSR filing by HCL Technologies Limited for the financial year ended March 31, 2023 (“FY 2022–23”), in PDF format as well as in XBRL as per the circulars issued by BSE Limited and National Stock Exchange of India Limited.

We would like to inform you that while filing the XBRL, we were not able to mention some information exactly in the manner that we had mentioned in the PDF document. The main reasons for the same are given hereunder:

1. At certain places XBRL accepts only mentioning of numbers, whereas instead of providing the information in numbers, the information on various principles/questions have been explained in text form only in the PDF document.
2. The XBRL accepts only one NIC code, whereas in the PDF document, we have referred to two NIC codes that are applicable.
3. There is an inter-segment elimination adjustment shown in our PDF document, however, there is no provision in the XBRL to reflect the same.

In view of the above, for the following Principles / Questions, we would request you to refer our response as stated in our PDF document of BRSR submitted with you.

| Reference              | Question No. | Particulars  |
|------------------------|--------------|--|
| Section A              | 15           | Products / Services sold by the entity (accounting for 90% of the entity's Turnover)                             |
| Section C, Principle 1 | 1            | Percentage (%) coverage by Training and awareness programmes on any of the principles during the financial year. |
| Section C, Principle 3 | 9            | Details of performance and career development reviews of employees and workers.                                  |
| Section C, Principle 5 | 3            | Details of Remuneration/ Salary/ Wages   |

This is for your information and records.

Yours Sincerely,  
**For HCL Technologies Limited**

**Manish Anand**  
**Company Secretary**

Encl.: a/a

# **BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT**

## **Statement from the Chair of the ESG & Diversity Equity Inclusion Committee (“ESG & DEI Committee”)**

Dear Stakeholders,

We are delighted to present our Business Responsibility and Sustainability Report (“BRSR”) for the financial year April 1, 2022 to March 31, 2023 (“FY23”). We engaged Ernst & Young Associates LLP (“EY”), as a third party to perform an independent limited assurance of our BRSR. The independent assurance statement by EY is also enclosed as part of the Annual Report.

HCLTech has undergone significant changes during FY23. We launched a new brand identity and we published our new purpose statement – “To bring together the best of technology and our people to supercharge progress”. The mantra of supercharging progress guides how we accelerate digital transformation for our clients, advances the aspirations of our people, contributes toward a more sustainable planet and works toward equitable and sustainable communities. The disclosures we present in our BRSR, reflect our HCLTech purpose.

The environmental, social and governance (“ESG”) & diversity, equity and inclusion (“DEI”) committee of the board met on four occasions in FY23 when HCLTech’s steady progress across these dimensions was reviewed. The key dimensions of our progress against our targets, have also been validated by external third-party recognitions. Some of the highlights are outlined below:

- MSCI has rated HCLTech as an ESG ‘Leader’ in the software and services industry. This year, HCLTech has been recognized as a leader with an “AA” rating, a significant move up from last year’s “A” rating.
- The S&P Global Sustainability Yearbook 2023 has recognized HCLTech as an ‘Industry Mover’. The Yearbook lists leading companies that have demonstrated sustainable business practices in their operations.
- HCLTech has also been included in Sustainalytics’ 2023 Top-Rated ESG companies list in the Software and Services Industry segment and in the Asia Pacific Region.

The progress achieved would not be possible without the appropriate focused execution and resource allocation of the initiatives and projects by the respective teams involved.

Each quarter, the committee presented its review on outcomes and relevant milestones to the board. During FY’23, in response to the recommendations of the committee, HCLTech has implemented an internal audit system covering all ESG disclosures. The outcome of the audit was reviewed by the Audit Committee of the board.

A separate sustainability report for FY’23 will also be published to give more details on the sustainability strategy implementation and the performance against the commitment and goals that have been outlined by HCLTech.

We will be eager to have your feedback on the BRSR disclosures and the sustainability report and look forward to hearing from you.

**Robin Abrams**  
**Chairperson – ESG & DEI Committee**

## SECTION A: GENERAL DISCLOSURES

### I. Details of the listed entity

|    |  |   |
|----|--|---|
| 1  | Corporate Identity Number (CIN) of the Listed Entity   | L74140DL1991PLC046369   |
| 2  | Name of the Listed Entity  | HCL Technologies Limited  |
| 3  | Year of incorporation  | 1991  |
| 4  | Registered office address  | 806, Siddharth, 96, Nehru Place, New Delhi - 110019, India  |
| 5  | Corporate address  | HCL Technology Hub, SEZ, Plot No. 3A, Sector 126, Noida - 201304, U.P., India   |
| 6  | E-mail   | <a href="mailto:investors@hcl.com">investors@hcl.com</a>  |
| 7  | Telephone  | 0120-430 6000   |
| 8  | Website  | <a href="http://www.hcltech.com">www.hcltech.com</a>  |
| 9  | Financial year for which reporting is being done   | April 1, 2022 to March 31, 2023   |
| 10 | Name of the Stock Exchange(s) where shares are listed  | National Stock Exchange of India Ltd ("NSE") and BSE Ltd. ("BSE")   |
| 11 | Paid-up Capital  | The paid-up equity share capital of HCL Technologies Limited as on March 31, 2023 is ₹542,73,30,192/- comprising of 271,36,65,096 equity shares of face value of ₹2/- each. |
| 12 | Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report | Mr. Santhosh Jayaram,<br>Global Head - Sustainability<br><a href="mailto:santhosh.jayaram@hcl.com">santhosh.jayaram@hcl.com</a>   |
| 13 | Reporting boundary   | The reporting scope and boundary for indicators, unless otherwise stated, covers the operations of HCLTech across all locations globally.                                   |

Note: All of HCLTech workforce is categorized as 'Employees' and none as 'Workers'. Hence in all the sections, details sought of the 'Workers' category are Not Applicable to HCLTech.

### II. Products / Services

#### 14. Details of business activities (accounting for 90% of the turnover)

| S. No. | Description of main activity                            | Description of business activity                          | % of turnover of the entity (FY'22) |
|--------|---|---|-------------------------------------|
| 1      | Information and Communication (Revenue from Operations) | Computer programming, consultancy, and related activities | 100%                                |

#### 15. Products / Services sold by the entity (accounting for 90% of the entity's Turnover)

| S. No. | Product / Service  | NIC Code   | % of total turnover contributed |
|--------|--|--|---------------------------------|
| 1      | IT & Business Services ("ITBS") - ITBS enables global enterprises to transform their business via Digital Foundation, a modernized infrastructure stack built around hybrid cloud, software-defined networks, the digital workplace, and other elements; Digital Business, a combination of application services and consulting capabilities; Digital Operations, a three-pronged setup for modernized and efficient operations at enterprise level. | Services are broadly mapped to NIC classes 620 and 631 | 73%                             |
| 2      | Engineering and R&D Services ("ERS") - Engineering services and solutions in all aspects of product development and platform engineering.  |  | 16.6%                           |
| 3      | HCL Software - Provision of modernized software products to global clients for their technological and industry-specific requirements.   |  | 10.9%                           |
| 4      | Inter segment elimination  |  | (0.5%)                          |

### III. Operations

#### 16. Number of locations where plants and / or operations / offices of the entity are situated

| Location      | Number of plants | Number of offices | Total |
|---------------|------------------|-------------------|-------|
| National      | Not applicable   | 42                | 42    |
| International | Not applicable   | 207               | 207   |

## 17. Markets served by the entity

### a. Number of locations

| Locations                        | Number |
|----------------------------------|--------|
| National (No. of States)         | 9      |
| International (No. of Countries) | 53     |

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

The geography wise revenue of HCLTech is listed below:

|                          | Unit             | FY 2022-23      |
|--------------------------|------------------|-----------------|
| <b>America</b>           | ₹ (crore)        | 57,818          |
| <b>Europe</b>            | ₹ (crore)        | 26,868          |
| <b>India*</b>            | ₹ (crore)        | 3,935           |
| <b>Rest of the world</b> | ₹ (crore)        | 12,835          |
| <b>Total</b>             | <b>₹ (crore)</b> | <b>1,014,56</b> |

\*Note: Includes revenue billed to India, based captive of global clients.

### c. A brief on types of customers

HCLTech is committed to supercharging progress, delivering pioneering services and products that positively impact its clients, employees, communities and the planet. HCLTech seeks to be the preferred digital partner for Global 2000 enterprises, a strategic objective aligned to the long-term value of building deep, strategic client relationships as a trusted partner. We focus on G2000 and G2000 equivalent companies such as privately held or government-owned entities. We also work with the fastest-growing digital-native companies that are on a rapid growth track toward achieving G2000 status. HCLSoftware has its client universe which is broader and is consistent with the business objectives of a software business. The key industry verticals that HCLTech caters primarily are Financial Services, Manufacturing, Life sciences & Healthcare, Technology & Services, Public Services#, Retail & CPG, and Telecommunications, Media, Publishing & Entertainment.

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

## IV. Employees

### 18. Details as at the end of the financial year

#### a. Employees and workers (including differently abled)

| S.No.            | Particulars                    | Total (A)      | Male           |              | Female        |               | Others     |              |
|------------------|--------------------------------|----------------|----------------|--------------|---------------|---------------|------------|--------------|
|                  |                                |                | No. (B)        | % (B / A)    | No. (C)       | % (C / A)     | No. (D)    | % (D / A)    |
| <b>Employees</b> |                                |                |                |              |               |               |            |              |
| 1                | Permanent (D)                  | 225,944        | 159,842        | 70.7%        | 65,907        | 29.2%         | 195        | 0.09%        |
| 2                | Other than Permanent (E)       | 15,408         | 11,254         | 73.0%        | 4,007         | 26.01%        | 147        | 0.95%        |
|                  | <b>Total employees (D + E)</b> | <b>241,352</b> | <b>171,096</b> | <b>70.9%</b> | <b>69,914</b> | <b>28.96%</b> | <b>342</b> | <b>0.14%</b> |

Note: Disclosing gender is voluntary for HCLTech employees. The employees who have not disclosed their gender are categorized as 'Others'.

#### b. Differently abled Employees and workers

| S.No.                              | Particulars                                      | Total (A)  | Male       |               | Female     |               |
|------------------------------------|--|------------|------------|---------------|------------|---------------|
|                                    |  |            | No. (B)    | % (B / A)     | No. (C)    | % (C / A)     |
| <b>Differently abled employees</b> |  |            |            |               |            |               |
| 1.                                 | Permanent (D)                                    | 549        | 386        | 70.31%        | 163        | 29.69%        |
| 2.                                 | Other than Permanent (E)                         | 7          | 7          | 100%          | 0          | 0             |
|                                    | <b>Total differently abled employees (D + E)</b> | <b>556</b> | <b>393</b> | <b>70.68%</b> | <b>163</b> | <b>29.32%</b> |

## 19. Participation / Inclusion / Representation of women

| Particulars              | Total (A) | No. and percentage of Females |           |
|--------------------------|-----------|-------------------------------|-----------|
|                          |           | No. (B)                       | % (B / A) |
| Board of Directors       | 13        | 4                             | 30.76     |
| Key Management Personnel | 3         | 0                             | 0.00      |

## 20. Turnover rate for permanent employees and workers

|                     | FY 2022-23 |        |        |        | FY 2021-22 |        |        |        | FY 2020-21 |        |       |
|---------------------|------------|--------|--------|--------|------------|--------|--------|--------|------------|--------|-------|
|                     | Male       | Female | Others | Total  | Male       | Female | Others | Total  | Male       | Female | Total |
| Permanent Employees | 19.83%     | 18.60% | 15.67% | 19.50% | 21.87%     | 22.05% | 31.67% | 21.92% | 9.81%      | 10.16% | 9.90% |

**Note:** This data is voluntary attrition % (LTM – IT Services)

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

### 21. Names of holding / subsidiary / associate companies / joint ventures:

Details of Holding, Subsidiary and Associate Companies (including joint ventures) are provided in Directors' Report (Section 8), which forms part of the Annual Report.

All the entities indicated participate in the Business Responsibility initiatives of the listed entity.

## VI. CSR Details

### 22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes / No) - Yes

(ii) **Turnover** (in crore): ₹101,456 (as per consolidated financial statements); ₹ 46,276 (as per Standalone financial statements)

(iii) **Net worth** (in crore): ₹65,398 (as per consolidated financial statements); ₹ 41,104 (as per Standalone financial statements)

## VII. Transparency and Disclosures Compliances

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

#### Employees

The Company is committed to provide employees with a safe and secure work environment, which is free of discrimination and harassment, including any form of sexual harassment. The Company's 'Grievance Redressal Protocol' outlines ways of working, responsibilities and processes adopted during handling violations pertaining to following:

- Acts which violate POSH Act 2013 & Secure Policy of the Company.
- Acts which violate COBEC and ABAC Policy of the Company and Acts which come under the purview of Whistleblower Policy of the Company.

The Company has implemented several avenues to resolve employee problems, including the Secure (Anti-Sexual Harassment Initiative), HEAR (Hearing Employees and Resolving their Concerns) platform, and the Whistleblower Policy.

“HEAR” is an integrated channel and serves as access to the Desk of the Ombudsman who directs any grievance raised by the employees to the appropriate individuals to investigate. All employee grievances (including employee / HR related matters) can be reported by writing directly to [hear@hcl.com](mailto:hear@hcl.com). In case any employee experiences any form of Sexual harassment they can report the incidents by directly writing to [Secure@hcl.com](mailto:Secure@hcl.com). The complaints covered under the Whistleblower Policy can be raised by writing to [whistleblower@hcl.com](mailto:whistleblower@hcl.com).

For details on employee grievances and resolution, please refer to question 13 of principle 3 and question 6 of principle 5. During FY 2022-23, 54 whistleblower complaints have been filed by employees. Additionally, 66 anonymous complaints were also received.

## Investors / Shareholders

The Company's shareholders' grievance redressal mechanism ensures accountability & transparency and is overseen by the Stakeholders' Relationship Committee of the Company. All shareholders queries / grievances are promptly responded to by the Registrar and Share Transfer Agent or the Company. The Company has also placed on its website the FAQs which may be helpful for the shareholders to get information on shareholders related matters and guides them on the steps / documents required to process their requests on various matters. For investor related complaints, refer to section 'Investors' Grievances' in the Corporate Governance Report.

## Customers

HCLTech has institutionalized process to help customers raise grievance and complaints related to its business conduct. These include the following:

- Customer Advisory Board (CAB) – It consists of CXOs from our strategic accounts across a variety of industries. The CAB member perspectives, insights and directional guidance help HCLTech better address customer needs and ensure our value propositions and services continue to deliver real value to our customers.
- CREST - Through a governance framework called CREST, HCLTech has institutionalized the process of cadence meetings, the process of checking in regularly with clients. Any customer complaints or escalations as received by the LOB heads, are picked by the respective delivery owners and actions are put in place to address their concerns. This is then tracked as part of Quarterly Business Review ("QBR") or Executive Business Review ("EBR") which is attended by the LOB heads along with customers and tracked as part of CREST.
- ACSAT & PCSAT - HCLTech measures client satisfaction both at project level as well as engagement level. At project level, HCLTech under its Project CSAT (PCSAT) initiative surveys close to 3000+ projects to monitor client satisfaction for each project, while once a year, an independent third party conducts an account-level CSAT (ACSAT) to provide a health check on client engagement and relationships, benchmarked against competitors.
- CRISP – HCLTech has a unique framework called CRISP which is adopted across the organization to act on customer feedback. Taking an action on customer feedback is the key tenet of customer centricity and has helped us improve the relationship with customer and enhance our services over the years. CRISP is an acronym for Customer Relationship Improvement and Solutioning Partnership.
- HCLTech's account management teams also connects with their respective customers on monthly basis to capture their feedback and highlights the same internally. The account teams accordingly take proactive actions to prevent any dissatisfaction.
- Finally HCLTech also has an effective Whistleblower Policy which defines and lays down the process for raising a Complaint for any stakeholder including our clients. They can write to [whistleblower@hcl.com](mailto:whistleblower@hcl.com) wherein any complaints related to Unethical and Improper Practices will be dealt by this Policy. Any HR related complaints are forwarded to [hear@hcl.com](mailto:hear@hcl.com).

Together these mechanisms ensure HCLTech is well equipped to proactively handle any complaints / grievances on any of the 9 governing principles.

## Value Chain Partners

The Company is committed to aiding Suppliers and Partners in adhering to policies and practices. In the event of a grievance, the Company welcomes input and promote communication with any interested party. If suppliers have any questions, concerns, or grievances about Company's policies or procedures, they are encouraged to email us at [procurementconcerns@hcl.com](mailto:procurementconcerns@hcl.com). The whistleblower policy of the Company extends to value chain partners as well. During the financial year 2022-23, no grievances were received.

## Communities

The corporate social responsibility agenda for HCLTech is delivered by the HCL Foundation. It deeply upholds the value of accountability and aims to accept, assess, and resolve feedback or complaints received from our community of stakeholders ranging from but not limited to HCL Foundation employees, HCLTech employees, volunteers, third-party employees, consultants associated with the projects of the Company, NGO partners, social sector organizations, government authorities, programme participants, community members and others. Any deviation from the law of the land, HCLTech Code of Conduct or HCL Foundation Child Protection Policy by any stakeholder associated with the programmes / projects of the Company is taken up seriously for review and redressal via multi-pronged, scientific and transparent channels.

HCL Foundation aims to ensure that every stakeholder is provided a safe environment to share their concerns / grievances. High level of confidentiality is maintained in sensitive matters to respect and maintain dignity of the complainant. No grievances have been received from community in FY 2022-23.

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

Details of Company's material issues and associated risks and opportunities is available in Sustainability Report, Section 'Stakeholder Engagement'.

### SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

| Disclosure Questions   | P1  | P2  | P3  | P4  | P5  | P6  | P7  | P8  | P9  |
|--|---|-----|-----|-----|-----|-----|-----|-----|-----|
| <b>Policy and management processes</b>   |   |     |     |     |     |     |     |     |     |
| <b>1. a) Whether your entity's policy /policies cover each principle and its core elements of the NGRBCs. (Yes / No)</b> | Yes   | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| <b>b) Has the policy been approved by the Board? (Yes / No)</b>  | Yes.<br>The Policies are approved in accordance with the authorities delegated by the Board.  |     |     |     |     |     |     |     |     |
| <b>c) Web Link of the Policies, if available</b>   | <p>P1:<br/>Code of Business Ethics and Conduct: <a href="https://www.hcltech.com/investors/governance-policies/cobecpdf">https://www.hcltech.com/investors/governance-policies/cobecpdf</a><br/>Anti-Bribery &amp; Anti-Corruption policy: <a href="https://www.hcltech.com/investors/governance-policies/abacpdf">https://www.hcltech.com/investors/governance-policies/abacpdf</a><br/>Dividend Distribution Policy: <a href="https://www.hcltech.com/sites/default/files/dividend_distribution_policy.pdf">https://www.hcltech.com/sites/default/files/dividend_distribution_policy.pdf</a><br/>Group tax strategy: <a href="http://www.hcltech.com/sites/default/files/hcl_group_tax_strategy_03122019.pdf">http://www.hcltech.com/sites/default/files/hcl_group_tax_strategy_03122019.pdf</a><br/>Composition of various committees of board of directors: <a href="https://www.hcltech.com/sites/default/files/composition_of_various_committees_of_board_of_directors2k1.pdf">https://www.hcltech.com/sites/default/files/composition_of_various_committees_of_board_of_directors2k1.pdf</a><br/>Criteria of making payments to non-executive directors: <a href="https://www.hcltech.com/sites/default/files/documents/inline-migration/criteria_of_making_payments_to_non_executive_directors.pdf">https://www.hcltech.com/sites/default/files/documents/inline-migration/criteria_of_making_payments_to_non_executive_directors.pdf</a></p> <p>P2:<br/>Procurement Policy: <a href="https://www.hcltech.com/sites/default/files/documents/Procurement-Policy.pdf">https://www.hcltech.com/sites/default/files/documents/Procurement-Policy.pdf</a><br/>Code of Business Ethics and Conduct: <a href="https://www.hcltech.com/investors/governance-policies/cobecpdf">https://www.hcltech.com/investors/governance-policies/cobecpdf</a><br/>Anti-Bribery &amp; Anti-Corruption policy: <a href="https://www.hcltech.com/investors/governance-policies/abacpdf">https://www.hcltech.com/investors/governance-policies/abacpdf</a><br/>Environmental Sustainability Policy: <a href="https://www.hcltech.com/sites/default/files/documents/sustainability/EMS-Policy-2022.pdf">https://www.hcltech.com/sites/default/files/documents/sustainability/EMS-Policy-2022.pdf</a><br/>Occupational Health &amp; Safety Policy: <a href="https://www.hcltech.com/sites/default/files/documents/sustainability/OHS-Policy-2022.pdf">https://www.hcltech.com/sites/default/files/documents/sustainability/OHS-Policy-2022.pdf</a></p> <p>P3:<br/>Procurement Policy: <a href="https://www.hcltech.com/sites/default/files/documents/Procurement-Policy.pdf">https://www.hcltech.com/sites/default/files/documents/Procurement-Policy.pdf</a><br/>Code of Business Ethics and Conduct: <a href="https://www.hcltech.com/investors/governance-policies/cobecpdf">https://www.hcltech.com/investors/governance-policies/cobecpdf</a><br/>Occupational Health &amp; Safety Policy: <a href="https://www.hcltech.com/sites/default/files/documents/sustainability/OHS-Policy-2022.pdf">https://www.hcltech.com/sites/default/files/documents/sustainability/OHS-Policy-2022.pdf</a><br/>Whistleblower Policy: <a href="https://www.hcltech.com/investors/governance-policies/whistleblowerpolicy.pdf">https://www.hcltech.com/investors/governance-policies/whistleblowerpolicy.pdf</a><br/>Remuneration Policy: <a href="https://www.hcltech.com/investors/governance-policies/rempolicy.pdf">https://www.hcltech.com/investors/governance-policies/rempolicy.pdf</a><br/>HCL Group Tax Strategy: <a href="https://www.hcltech.com/sites/default/files/HCLGroupTaxStrategyFY22.pdf">https://www.hcltech.com/sites/default/files/HCLGroupTaxStrategyFY22.pdf</a><br/>Human Rights Policy: <a href="https://www.hcltech.com/sites/default/files/documents/inline-migration/human-rights-policy.pdf">https://www.hcltech.com/sites/default/files/documents/inline-migration/human-rights-policy.pdf</a></p> <p>P4:<br/>Code of Business Ethics and Conduct: <a href="https://www.hcltech.com/investors/governance-policies/cobecpdf">https://www.hcltech.com/investors/governance-policies/cobecpdf</a><br/>Whistleblower Policy: <a href="https://www.hcltech.com/investors/governance-policies/whistleblowerpolicy.pdf">https://www.hcltech.com/investors/governance-policies/whistleblowerpolicy.pdf</a><br/>Dividend Distribution Policy: <a href="https://www.hcltech.com/sites/default/files/dividend_distribution_policy.pdf">https://www.hcltech.com/sites/default/files/dividend_distribution_policy.pdf</a><br/>Policy for determination of materiality of event or information: <a href="https://www.hcltech.com/investors/governance-policies/eterminationofmaterialityofeventspolicy.pdf">https://www.hcltech.com/investors/governance-policies/eterminationofmaterialityofeventspolicy.pdf</a><br/>Related Party Policy: <a href="https://www.hcltech.com/investors/governance-policies/rptpolicy.pdf">https://www.hcltech.com/investors/governance-policies/rptpolicy.pdf</a><br/>Fair Disclosure Code: <a href="https://www.hcltech.com/investors/governance-policies/fair-disclosure-code.pdf">https://www.hcltech.com/investors/governance-policies/fair-disclosure-code.pdf</a></p> <p>P5:<br/>Code of Business Ethics and Conduct: <a href="https://www.hcltech.com/investors/governance-policies/cobecpdf">https://www.hcltech.com/investors/governance-policies/cobecpdf</a><br/>Human Rights Policy: <a href="https://www.hcltech.com/sites/default/files/documents/inline-migration/human-rights-policy.pdf">https://www.hcltech.com/sites/default/files/documents/inline-migration/human-rights-policy.pdf</a></p> |     |     |     |     |     |     |     |     |

|  |  |     |     |     |     |     |     |     |   |
|--|--|-----|-----|-----|-----|-----|-----|-----|---|
|  | <p>P6:<br/>Environmental and Sustainability Policy: <a href="https://www.hcltech.com/sustainability#policies">https://www.hcltech.com/sustainability#policies</a><br/>Energy Policy: <a href="https://www.hcltech.com/sites/default/files/documents/sustainability/EnMS-Policy-2022.pdf">https://www.hcltech.com/sites/default/files/documents/sustainability/EnMS-Policy-2022.pdf</a><br/>Occupational Health &amp; Safety Policy: <a href="https://www.hcltech.com/sites/default/files/documents/sustainability/OHS-Policy-2022.pdf">https://www.hcltech.com/sites/default/files/documents/sustainability/OHS-Policy-2022.pdf</a><br/>Procurement Policy: <a href="https://www.hcltech.com/sites/default/files/documents/Procurement-Policy.pdf">https://www.hcltech.com/sites/default/files/documents/Procurement-Policy.pdf</a></p> <p>P7:<br/>Code of Business Ethics and Conduct: <a href="https://www.hcltech.com/investors/governance-policies/cobecpdf">https://www.hcltech.com/investors/governance-policies/cobecpdf</a><br/>Anti-Bribery &amp; Anti-Corruption policy: <a href="https://www.hcltech.com/investors/governance-policies/abacpdf">https://www.hcltech.com/investors/governance-policies/abacpdf</a></p> <p>P8:<br/>CSR Policy: <a href="https://www.hcltech.com/investors/governance-policies/csrapolicy.pdf">https://www.hcltech.com/investors/governance-policies/csrapolicy.pdf</a></p> <p>P9:<br/>Code of Business Ethics and Conduct: <a href="https://www.hcltech.com/investors/governance-policies/cobecpdf">https://www.hcltech.com/investors/governance-policies/cobecpdf</a><br/>Anti-Bribery &amp; Anti-Corruption policy: <a href="https://www.hcltech.com/investors/governance-policies/abacpdf">https://www.hcltech.com/investors/governance-policies/abacpdf</a><br/>Privacy Statement : <a href="https://www.hcltech.com/privacy-statement">https://www.hcltech.com/privacy-statement</a></p> |     |     |     |     |     |     |     |   |
| <b>2. Whether the entity has translated the policy into procedures (Yes / No)</b>  | Yes  | Yes | Yes | Yes | Yes | Yes | Yes | Yes | - |
| <b>3. Do the enlisted policies extend to your value chain partners? (Yes / No)</b>   | Yes  | Yes | Yes | Yes | Yes | Yes | Yes | Yes | - |
| <b>4. Name of the national and international codes / certifications/labels/standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustee) standards (e.g. SA 8000, OHSAS, ISO, BIS) mapped to each principle</b> | <ul style="list-style-type: none"> <li>• ISO 37001:2022</li> <li>• ISO 45001:2018</li> <li>• ISO 14001:2015</li> <li>• ISO 50001:2018</li> <li>• ISO 9001:2015</li> <li>• ABMS ISO 37001:2016</li> <li>• LEED Certification</li> <li>• Great Place to Work</li> </ul>  |     |     |     |     |     |     |     |   |
| <b>5. Specific commitments, goals and targets set by the entity with defined timelines, if any</b>   | <p>Principle 1:<br/>• Integrating ESG into Risk management process and internal audit process.</p> <p>Principle 2:<br/>• Strengthening the sustainable supply chain process.</p> <p>Principle 3:<br/>• Improving the ESG Knowledge and Skills of the employees.<br/>• Improving the gender diversity in workforce with 40% Women by 2030.<br/>• Increase gender representation in senior leadership levels to 30% by 2030.<br/>• Being recognized among the best employers in our key operating geographies.</p> <p>Principle 5:<br/>• Strengthening the sustainable supply chain process.</p> <p>Principle 6:<br/>• Achieve Net Zero by 2040.<br/>• Achieve a reduction of 50% on absolute scope 1 &amp; 2 emissions by 2030 compared to 2020 baseline.<br/>• Transition to 80% of electricity usage to renewable energy by 2030.<br/>• Maintain Zero Discharge from all owned facilities.<br/>• Achieve Zero Waste to Landfill at all owned facilities by 2025.<br/>• Strengthening the sustainable supply chain process.</p> <p>Principle 8:<br/>• Strengthening the sustainable supply chain process.</p> <p>Principle 9:<br/>• Being recognized among industry leaders for information security practices and data privacy standards.</p>   |     |     |     |     |     |     |     |   |
| <b>6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met</b>  | <p>Details on performance against the Company commitments are available in the Sustainability Report 2023.</p>   |     |     |     |     |     |     |     |   |



| Governance, Leadership, and Oversight   |   |
|---|---|
| 7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure) | The Statement is available at the beginning of the BRSR section.  |
| 8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy/policies   | The highest executive authority responsible for the implementation of the policies is the CEO & Managing Director – Mr. C. Vijayakumar.   |
| 9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details  | <p>The Company has an ESG &amp; DEI Committee of the Board. The members of the ESG &amp; DEI Committee are:</p> <ul style="list-style-type: none"> <li>Ms. Robin Ann Abrams (DIN 00030840)<br/>Independent Director<br/>Chairperson of the Committee</li> <li>Ms. Roshni Nadar Malhotra (DIN 02346621)<br/>Non Independent Director<br/>Chairperson of HCL Technologies Limited</li> <li>Mr. Simon John England (DIN 08664595)<br/>Independent Director</li> </ul> <p>Mr. C. Vijayakumar, CEO &amp; Managing Director, is an invitee to this Committee.</p> |

#### 10. Details of Review of NGRBCs by the Company:

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

| 11. Has the entity carried out independent assessment / evaluation of the working of its policies by an external agency? | P1  | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|--|---|----|----|----|----|----|----|----|----|
|  | <ul style="list-style-type: none"> <li>Ernst and Young Associates LLP</li> <li>BSI</li> </ul> |    |    |    |    |    |    |    |    |

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

Not Applicable

### SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

In this section, the Company will delve into how it has demonstrated its performance in integrating the National Guidelines of Responsible Business Conduct (“NGRBC”) Principles and its core elements with its key processes and decisions.

The information sought is categorized as “Essential” and “Leadership”. While the essential indicators are mandatory, the leadership indicators present an opportunity for it to aspire towards higher levels of responsibility and showcase its voluntary disclosures. The Company’s comprehensive report encompasses both essential and leadership indicators, providing a thorough assessment of its commitment to social, environmental, and ethical responsibility.

**PRINCIPLE 1:** Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

**Essential Indicators:**

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

| Segment                           | Total number of training and awareness programmes held  | Topics / principles covered under the training and its impact | % of persons in respective category covered by the awareness programmes |
|-----------------------------------|---|---|---|
| Board of Directors                | Through the learning platform, the Company offers several courses covering the principles of BRSR. Topics covered include, Business ethics, workplace conduct, fraud, bribery and corruption, conflicts of interest, financial interests, personal relationships, money laundering, money laundering risk lifecycle, speaking up, information security, climate change etc. |   | 100%  |
| Key Managerial Personnel          |   |   | 100%  |
| Employees other than BoD and KMPs |   |   | 100%  |

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

None.

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

Not Applicable.

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

Yes, the Company has Code of Business Ethics and Conduct (COBEC)\*, Anti-Bribery & Anti-Corruption policy ("ABAC")\$ and Anti-Bribery & Anti-Corruption Note from our CEO#. These apply to all individuals working worldwide for all affiliates and subsidiaries of HCLTech at all levels and grades. It covers giving and offering of bribes, and bribing of government officials, facilitation payments, charitable donation, political activities. Foreign Corrupt Practices Act (FCPA) & UK Bribery Act (UKBA) are the governing legislations of this policy. The Anti-Bribery Management Systems (ABMS) is certified against ISO 37001-2016. Certification can be accessed at the website of the Company at <https://www.hcltech.com/investors/corporate-certifications>

**Note:**

\* <https://www.hcltech.com/investors/governance-policies/cobecpdf>

\$ <https://www.hcltech.com/investors/governance-policies/abacpdf>

# [https://www.hcltech.com/sites/default/files/documents/inline-migration/anti-bribery\\_anti-corruption\\_note\\_from\\_our\\_ceo.pdf](https://www.hcltech.com/sites/default/files/documents/inline-migration/anti-bribery_anti-corruption_note_from_our_ceo.pdf)

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

| Particulars | FY 2022-23 | FY 2021-22 |
|-------------|------------|------------|
| Directors   | Nil        | Nil        |
| KMPs        |            |            |
| Employees   |            |            |

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

| Particulars  | FY 2022-23 |         | FY 2021-22 |         |
|--|------------|---------|------------|---------|
|  | Number     | Remarks | Number     | Remarks |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | Nil        |         |            |         |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs      |            |         |            |         |

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

Not applicable, since there were no issues related to fines / penalties / action taken by regulators / law enforcement agencies / judicial institutions, on cases of corruption and conflicts of interest at HCLTech.

**Leadership Indicators:**

**1. Awareness programmes conducted for value chain partners on any of the principles during the financial year**

| Total number of awareness programmes held | Topics / principles covered under the training   | % of value chain partners covered (by value of business done with such partners) under the awareness programmes |
|---|--|---|
| 580                                       | <p>During the financial year, the Company has conducted various awareness programs for its value chain partners to promote Health and Safety, Wellbeing, Awareness and Policies, and Ethics. A range of topics was covered including risk assessment &amp; work permit system awareness, awareness on electrical safety, LOTO (Lockout-Tagout) system, energy consumption &amp; conservation, chemical safety &amp; MSDS awareness, fire safety, emergency preparedness &amp; evacuation procedure awareness, awareness on incident reporting &amp; management, awareness on QHSEE Policy- objectives &amp; targets, awareness on Legal compliances, mental health awareness, awareness on power tools safety, PPE &amp; its Importance, slip-trip- fall &amp; ergonomics awareness, confined space &amp; lone working awareness, safe driving / road safety, energy conservation, environmental impacts, waste reduction.</p> <p>Trainings were also conducted on aspects like ethics, anti-bribery, POSH and information security.</p> | 100% of high-risk value chain partners are covered.   |

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

Yes.

The Company receives from the members of the Board, a list of entities in which they are interested, at the beginning of every financial year and as and when there is any change in such interest. It is ensured that the requisite approvals as required under the statute as well as the Company's policies are in place before transacting with such entities.

Further, the Company has adopted the Code of Business Ethics and Conduct which requires that the Directors of the Company shall avoid any activity or association that creates or appears to create a conflict between the personal interests of the Directors and the business interests of the Company.

**PRINCIPLE 2: Businesses should provide goods and services in a manner that is sustainable and safe.**

**Essential Indicators:**

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

| Particulars                  | FY 2022-23 | FY 2021-22 | Details of improvements in environmental and social impacts   |
|------------------------------|------------|------------|---|
| <b>R&amp;D (₹ in crores)</b> | 1,632      | 1,526      | R&D investments are made to upgrade the effectiveness of the products and services and to develop new products and services. All the products and services help in improved efficiency for the Company's clients and thus resulting in environmental and social benefits. |
| <b>Capex (₹ in crores)</b>   | 1,661      | 1,645      | Capex is mostly on the infrastructure. Better equipment and better buildings improve the Company's energy efficiency and accessibility.   |

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

**b) If yes, what percentage of inputs were sourced sustainably?**

The Company has a procedure in place to onboard suppliers' basis sustainability parameters. All new vendor onboarding goes through HCLTech's Vendor Due Diligence process which also covers ESG. HCLTech has also started doing a supply chain ESG risk assessment and based on the risk, have started ESG assessments on selected vendors. Thus, 100% of the Company's suppliers are covered under our sustainable sourcing program.

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

Not Applicable.

**4. Whether Extended Producer Responsibility ("EPR") is applicable to the entity's activities (Yes / No).**

**If yes, whether the waste collection plan is in line with the EPR plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.**

Not Applicable.

**Leadership Indicators:**

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

Not Applicable.

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

Not Applicable.

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

Not Applicable.

**4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed of.**

Not Applicable.

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

Not Applicable.

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

**Essential Indicators:**

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

| Category                   | % of employees covered by |                   |             |                    |             |                    |             |                    |             |                     |             |
|----------------------------|---------------------------|-------------------|-------------|--------------------|-------------|--------------------|-------------|--------------------|-------------|---------------------|-------------|
|                            | Total (A)                 | Health insurance* |             | Accident insurance |             | Maternity benefits |             | Paternity Benefits |             | Day Care facilities |             |
|                            |                           | Number (B)        | % (B / A)   | Number (C)         | % (C / A)   | Number (D)         | % (D / A)   | Number (E)         | % (E / A)   | Number (F)          | % (F / A)   |
| <b>Permanent employees</b> |                           |                   |             |                    |             |                    |             |                    |             |                     |             |
| Male                       | 121,623                   | 121,623           | 100%        | 121,623            | 100%        | NA                 | NA          | 121,623            | 100%        | 121,623             | 100%        |
| Female                     | 51,481                    | 51,481            | 100%        | 51,481             | 100%        | 51,481             | 100%        | NA                 | NA          | 51,481              | 100%        |
| Others                     | -                         | -                 | -           | -                  | -           | -                  | -           | -                  | -           | -                   | -           |
| <b>Total</b>               | <b>173,104</b>            | <b>173,104</b>    | <b>100%</b> | <b>173,104</b>     | <b>100%</b> | <b>51,481</b>      | <b>100%</b> | <b>121,623</b>     | <b>100%</b> | <b>173,104</b>      | <b>100%</b> |

**Note:** 1. \* Health insurance includes ESIC coverage.

2. India Headcount has been considered for the table above.

**2. Details of retirement benefits**

| Benefits                | FY 2022-23   |  |  | FY 2021-22   |  |  |
|-------------------------|--|--|--|--|--|--|
|                         | No. of employees covered as a % of total employees | No. of workers covered as a % of total workers | Deducted and deposited with the authority (Y/N/N.A.) | No. of employees covered as a % of total employees | No. of workers covered as a % of total workers | Deducted and deposited with the authority (Y/N/N.A.) |
| PF                      | 100%   | NA   | Y  | 100%   | NA   | Y  |
| Gratuity                | 100%   | NA   | Y  | 100%   | NA   | Y  |
| ESI                     | 10.88%   | NA   | Y  | 12%  | NA   | Y  |
| Others - please specify | -  | -  | -  | -  | -  | -  |

**Note:** India Headcount has been considered for the table above.

**3. Accessibility of workplaces**

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

Yes. All of HCLTech's office spaces are equipped with ramps, voice enabled lifts, PWD washrooms, reserved parking spaces, and an emergency warning system with both audio and visual alarms. The Company has also conducted third-party assessment on its facilities in relation to accessibility during the year 2022-23. Additionally, all of the Company's websites and internal portals are in line with the WCAG guidelines, and the Company constantly update its portals to make them more accessible.

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

Yes, the Company has an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016.

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

| Gender       | Permanent employees |                |
|--------------|---------------------|----------------|
|              | Return to work rate | Retention rate |
| Male         | 99.97%              | 68.7%          |
| Female       | 98.87%              | 63.9%          |
| <b>Total</b> | <b>99.42%</b>       | <b>66.8%</b>   |

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

| Particulars                    | (If yes, then give details of the mechanism in brief)  |
|--------------------------------|--|
| Permanent Employees            | Yes. HCLTech has a multi-tiered grievance handling mechanism that includes dedicated channels for addressing harassment, whistle-blower, security incidents, discrimination, general grievances, etc. It applies to all employees. The Company has instituted multiple channels to address employee grievances, such as Secure (Anti-Sexual Harassment Initiative), HEAR (Hearing Employees and Resolving their concerns) platform and the Whistleblower Policy.<br>HEAR (Hearing Employees and Resolving their concerns) platform provides fair, neutral, and independent access for employees to voice their concerns. Employees can write to <a href="mailto:hear@hcl.com">hear@hcl.com</a> with their concerns and if it's related to the company & its employees, fair and just access is provided in resolving their grievances. In case any employee experiences any form of sexual harassment, they can report the incident by directly writing to <a href="mailto:secure@hcl.com">secure@hcl.com</a> . To ensure appropriate reporting of Unethical and Improper Practices, the Company encourage its employees to report matters to <a href="mailto:whistleblower@hcl.com">whistleblower@hcl.com</a> . |
| Other than Permanent Employees |  |

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

While HCLTech does not restrict any employee from being a member of any employee-related association and provides freedom, the company also ensures that it abides by the local laws present across the geographies that it operates in.

| Category                         | FY 2022-23   |  |         | FY 2021-22   |  |         |
|----------------------------------|--|--|---------|--|--|---------|
|                                  | Total employees / workers in respective category (A) | No. of employees / workers in respective category, who are part of association(s) or Union (B) | % (B/A) | Total employees / workers in respective category (C) | No. of employees / workers in respective category, who are part of association(s) or Union (D) | % (D/C) |
| <b>Total Permanent Employees</b> | 225,944  | 742  | 0.33    | 208,877  | 729  | 0.35    |
| - Male                           | 159,842  | 641  | 0.40    | 150,281  | 634  | 0.42    |
| - Female                         | 65,907   | 101  | 0.15    | 58,525   | 95   | 0.16    |
| - Others                         | 195  | -  | -       | 71   | -  | -       |

**Note:** The above data is inclusive of Work councils and Unions.

## 8. Details of training given to employees and workers

**Health and Safety Trainings:** Based on the risk exposure, periodic trainings are conducted for HCLTech employees and contractor employees.

**Skill upgradation trainings:**

| Category     | FY 2022-23     |                      |               | FY 2021-22     |                      |               |
|--------------|----------------|----------------------|---------------|----------------|----------------------|---------------|
|              | Total (A)      | On skill upgradation |               | Total (C)      | On skill upgradation |               |
|              |                | No. (B)              | % (B/A)       |                | No. (D)              | % (D/C)       |
| Male         | 171,096        | 124,462              | 72.74%        | 150,281        | 95,491               | 63.54%        |
| Female       | 69,914         | 52,947               | 75.73%        | 58,525         | 34,341               | 58.68%        |
| Others       | 342            | 33                   | 9.6%          | 71             | 30                   | 42.25%        |
| <b>Total</b> | <b>241,352</b> | <b>177,442</b>       | <b>73.52%</b> | <b>208,877</b> | <b>129,862</b>       | <b>62.17%</b> |

## 9. Details of performance and career development reviews of employees and worker

100% of eligible employees have received performance and career development reviews.

## 10. Health and safety management system

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

Yes, while 100% of HCLTech employees are covered under the OH&S Policies and procedures, facilities covering 65% of HCLTech employees are certified against ISO 45001.

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

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

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

Yes.

**d) Do the employees / workers of the entity have access to non-occupational medical and healthcare services?**

Yes.

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

| Safety Incident / Number  | Category  | FY 2022-23   | FY 2021-22 |
|---|-----------|--|------------|
| Lost Time Injury Frequency Rate (“LTIFR”) (per one million-person hours worked) | Employees | The Company is continuously looking to strengthen the monitoring systems in place and will start reporting on this data point in future. |            |
| Total recordable work-related injuries  | Employees | 5  | 1          |
| No. of fatalities   | Employees | -  | -          |
| High consequence work-related injury or ill-health (excluding fatalities)       | Employees | -  | -          |

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

The Company has the following measures to ensure a safe and healthy workplace:

1. Compliance with country specific Health & Safety laws.
2. Training on Occupational Health and Safety to employees.
3. Inspection & audits to check the compliance level.
4. Provision of Personal Protective Equipment to employees wherever needed.

In addition to this, HCL Healthcare, which is an arm of HCLTech Group provides end-to-end health care solutions to employees and their family members. The Company also provide added lab services, virtual specialist doctor consultations, eye care solutions and dental services. The Company’s clinics are designed to meet international standards and are committed to providing a comprehensive range of health care solutions to its employees and their families. HCLTech sites are certified under the OHS management system and it ensures the required measures are taken as per the standard to provide a safe and healthy workplace. Additionally, HCLTech sites are certified under PROTEK - POSI (“Prevention of spread of infection”).

The Company has the necessary systems in place to ensure employees’ safety is not compromised and they are encouraged to discuss any work-related hazards and health issues. The Company has safety committees that meet at regular intervals. The Company has safety incident reporting and management process to ensure that all work-related incidents are reported and closed after taking necessary corrective actions.

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

| Particulars        | FY 2022-23            |                                       |         | FY 2021-22            |                                       |         |
|--------------------|-----------------------|---------------------------------------|---------|-----------------------|---------------------------------------|---------|
|                    | Filed during the year | Pending resolution at the end of year | Remarks | Filed during the year | Pending resolution at the end of year | Remarks |
| Working Conditions | 14                    | 1                                     | -       | 1                     | -                                     | -       |
| Health & Safety    | 5                     | -                                     | -       | -                     | -                                     | -       |

**14. Assessments for the year**

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

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

The Company has taken proactive steps to address safety incidents and mitigate risks associated with health and safety practices. These measures reflect its commitment to maintaining a safe working environment and prioritizing the well-being of our employees and stakeholders.

To enhance accessibility and inclusivity, The Company has modernized entry / exit points at the Noida campus (Sector-126), specifically focusing on gate no. 2 to ensure smooth access for People with Disability (PWDs). This initiative promotes equal opportunities and aligns with Company's commitment to diversity and inclusivity. Rigorous adherence to Safe Work Method Statement ("SWMS") has been implemented before undertaking any hazardous work at the Noida Campus. This systematic approach ensures that potential risks are identified, assessed, and appropriate safety measures are in place, minimizing the likelihood of incidents and promoting a culture of safety.

Recognizing the importance of emergency preparedness, the Company is in the process of reworking the Emergency Management Process at the Noida Campus. Collaborating with external agencies, the Company aims to holistically improve the safety environment within the office premises. This initiative encompasses comprehensive safety measures for employees, visitors, vendor staff, and even children, ensuring their well-being during any unforeseen circumstances.

Adequate monitoring measures have been deployed during material shifting on service lifts at the Chennai Campus. This focus on monitoring helps mitigate potential risks associated with material handling and transportation, reducing the likelihood of accidents and injuries. Regular Planned Preventive Maintenance ("PPM") work is carried out at the Chennai Campus. By conducting routine maintenance activities, the Company ensure the optimal functioning of equipment and infrastructure, minimizing potential hazards and improving overall safety conditions.

To address specific risks and concerns, a study and risk assessment on water floods were conducted at the Jigani Campus in Bangalore. This comprehensive evaluation enables the Company to implement appropriate measures to mitigate the risks associated with water flooding, enhancing the safety of its operations.

Several infrastructure improvements have been made at the Company's campuses. For instance, the FM200 fire suppression system at the Bengaluru Jigani Campus has been replaced with the NOVAC system, enhancing fire safety measures.

Additionally, the cooling tower platform at the Bengaluru Jigani Campus has been replaced with Fiber Reinforced Plastic ("FRP") material, ensuring structural integrity and promoting a safe working environment.

Various other initiatives, such as installing handrails, implementing safety systems, conducting floor activities, and enhancing lighting and emergency provisions, have been undertaken across the Company's campuses to address specific safety concerns and promote a culture of safety.

By continuously evaluating risks, conducting assessments, and implementing appropriate measures, the Company strives to enhance health and safety practices across its campuses, fostering a culture of safety and well-being for all.

**Leadership Indicators:**

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

Yes, covering all the employees of the Company.

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

At HCLTech, all legal compliances are reviewed as part of our vendor audits.

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

| Particulars | Total no. of affected employees / workers |            | No. of employees / workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment |            |
|-------------|---|------------|---|------------|
|             | FY 2022-23                                | FY 2021-22 | FY 2022-23  | FY 2021-22 |
| Employees   | -   | -          | -   | -          |

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

Yes.



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

| Particulars                  | % of value chain partners (by value of business done with such partners) that were assessed |
|------------------------------|---|
| Health and safety conditions | 100% of the high-risk value chain partners are covered.                                     |
| Working conditions           | 100% of the high-risk value chain partners are covered.                                     |

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

Below are few of the corrective actions taken to address different risk / concerns recorded in audits-

- Toolbox talk provision for external service provider workers pertain to assigned work has been provisioned to put control and create awareness on PPEs importance and work related OH&S risk.
- As per the Company Policy the CCTV cameras are monitored, and the data is maintained for 30 days. All relevant data are maintained for records.

**PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its stakeholders.**

**Essential Indicators:**

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

The first stage of HCLTech’s stakeholder relations involves mapping and prioritizing key stakeholders based on relevance, role, and influence. Once the stakeholders have been identified and prioritized, the engagement channels are established. The result from the engagement is channelised inside the organization and ensures that the stakeholder gets the right feedback or resolution as the case may be. Internal Stakeholders of the Company include employees, senior leaders, managers, Board of Directors, members of HCL Foundation. External stakeholders include customers, investors, regulatory bodies, vendors, service providers and media. The stakeholder engagement exercise has helped the Company’s ESG focus areas in line with its underlying philosophy of Act, Pact & Impact. Stakeholder engagement is a critical aspect of HCLTech’s ESG strategy. Stakeholder engagement at HCLTech is a continuous process and helps us gauge and address the expectations of our stakeholders.

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

Details of stakeholder engagement are available in Sustainability Report (Section ‘Stakeholder Engagement’).

**Leadership Indicators:**

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

The Executive Directors and Senior Management Personnel are actively engaged in regular interactions with various stakeholders, including investors, employees, and customers. These engagements provide invaluable feedback that plays a crucial role in the Company’s commitment to sustainability. The feedback obtained from these interactions is then brought to the attention of the Board to ensure that the concerns and ideas of its stakeholders are given due consideration.

In addition, any significant topics that arise through regular stakeholder engagement are brought to the Board through various channels. The Company has a well-defined process in place for addressing suggestions, complaints, and grievances, which are carefully evaluated based on their significance. Depending on the nature and scope of the issues, they are referred to the appropriate committee of the Board.

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

Yes. The stakeholder consultations are one of the key inputs to determining the material topics. The Company looked at the aspects each stakeholder has brought out during the engagement and prioritized them using a risk and responsibility matrix to arrive at the Company’s 12 material topics.

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

The CSR projects handled by HCL Foundation focus on vulnerable / marginalized stakeholders as beneficiaries. The design of all Company's interventions ensure that the beneficiaries of its projects are from the vulnerable / marginalized groups. The Diversity, Equity and Inclusion activities of the Company also include actions in support which are explained in the respective section of the annual report and sustainability report.

**PRINCIPLE 5: Businesses should respect and promote human rights.**

**Essential Indicators:**

1. Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:

| Category               | FY 2022-23     |  |               | FY 2021-22     |  |               |
|------------------------|----------------|--|---------------|----------------|--|---------------|
|                        | Total (A)      | No. of employees / workers covered (B) | % (B/A)       | Total (C)      | No. of employees / workers covered (D) | % (D/C)       |
| <b>Employees</b>       |                |  |               |                |  |               |
| Permanent              | 225,944        | 210,843                                | 93.32%        | 208,877        | 174,020                                | 83.31%        |
| Other than permanent   | 15,408         | 13,364                                 | 86.73%        | 15,957         | 9,856                                  | 61.77%        |
| <b>Total employees</b> | <b>241,352</b> | <b>224,207</b>                         | <b>92.90%</b> | <b>224,834</b> | <b>183,876</b>                         | <b>81.78%</b> |

2. Details of minimum wages paid to employees and workers, in the following format

| Category                    | FY 2022-23 |                       |         |                        |         | FY 2021-22 |                       |         |                        |         |
|-----------------------------|------------|-----------------------|---------|------------------------|---------|------------|-----------------------|---------|------------------------|---------|
|                             | Total (A)  | Equal to minimum wage |         | More than minimum wage |         | Total (D)  | Equal to minimum wage |         | More than minimum wage |         |
|                             |            | No. (B)               | % (B/A) | No. (C)                | % (C/A) |            | No. (E)               | % (E/D) | No. (F)                | % (F/D) |
| <b>Employees</b>            |            |                       |         |                        |         |            |                       |         |                        |         |
| <b>Permanent</b>            |            |                       |         |                        |         |            |                       |         |                        |         |
| Male                        | 159,842    | 0                     | 0%      | 159,842                | 100%    | 150,281    | 0                     | 0%      | 150,281                | 100%    |
| Female                      | 65,907     | 0                     | 0%      | 65,907                 | 100%    | 58,525     | 0                     | 0%      | 58,525                 | 100%    |
| Others                      | 195        | 0                     | 0%      | 195                    | 100%    | 71         | 0                     | 0%      | 71                     | 100%    |
| <b>Other than permanent</b> |            |                       |         |                        |         |            |                       |         |                        |         |
| Male                        | 11,254     | 0                     | 0%      | 11,254                 | 100%    | 11,539     | 0                     | 0%      | 11,539                 | 100%    |
| Female                      | 4,007      | 0                     | 0%      | 4,007                  | 100%    | 4,255      | 0                     | 0%      | 4,255                  | 100%    |
| Others                      | 147        | 0                     | 0%      | 147                    | 100%    | 163        | 0                     | 0%      | 163                    | 100%    |

3. Details of remuneration / salary / wages, in the following format:

| Particulars                    | Male  |  | Female |  |
|--------------------------------|---|--|--------|--|
|                                | Number                                      | Median remuneration / salary / wages of respective category (₹ in Crore) | Number | Median remuneration / salary / wages of respective category (₹ in Crore) |
| Board of Directors**           | Refer Section 40 of the Directors' Report** |  |        |  |
| Key Managerial Personnel       |   |  |        |  |
| Employees other than BoD & KMP |   |  |        |  |

**Note:** \*\* Section 40 of the Directors' Report includes ratio of remuneration of each director to the median remuneration of the employees and the percentage increase in the median remuneration of employees in the financial year.

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

Yes

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

Employees and Individuals affected have access to mechanisms to raise concerns and such mechanisms are accessible, equitable and transparent. Any Employee or Individual may report a concern in writing or orally by communicating it to one of the following:

- Their Reporting Manager;
- Human Resources; and / or
- The Ethics Committee via [whistleblower@hcl.com](mailto:whistleblower@hcl.com).

Employees and Individuals are advised to submit a written complaint narrating the true sequence of the events leading to the violation along with any supporting evidence. Concerns may be reported as confidential or on an anonymous basis. The Company is committed to keeping the identity of the reporting Employee or Individual confidential to the maximum extent as consistent with the Company’s legal obligations but subject to the Company’s need to investigate reported violations.

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

| Particulars                       | FY 2022-23            |                                       |   | FY 2021-22            |                                       |   |
|-----------------------------------|-----------------------|---------------------------------------|---|-----------------------|---------------------------------------|---|
|                                   | Filed during the year | Pending resolution at the end of year | Remarks   | Filed during the year | Pending resolution at the end of year | Remarks   |
| Sexual Harassment                 | 55                    | 16*                                   | -   | 23                    | 2*                                    | -   |
| Discrimination at workplace       | Nil                   | Nil                                   | Among the workplace grievances reported by employees in FY 2022-23, there are no substantiated issues with respect to discrimination. | Nil                   | Nil                                   | Among the workplace grievances reported by employees in FY 2021-22, there are no substantiated issues with respect to discrimination. |
| Child Labour                      | Nil                   | Nil                                   | -   | Nil                   | Nil                                   | -   |
| Forced Labour/ Involuntary Labour | Nil                   | Nil                                   | -   | Nil                   | Nil                                   | -   |
| Wages                             | Nil                   | Nil                                   | -   | Nil                   | Nil                                   | -   |
| Other human rights related issues | Nil                   | Nil                                   | -   | Nil                   | Nil                                   | -   |

\*As on March 31<sup>st</sup> of respective year

**7. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.**

The “SECURE” initiative focuses on preventing and addressing grievances of sexual harassment in the workplace in line with HCLTech’s Prevention and Redressal of Sexual Harassment at workplace policy. The policy and processes comply with the prevailing laws, specifically the “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” for India-based employees and other relevant regulations in the countries that it operates. In case any employee experiences any form of sexual harassment, they can report the incident by directly writing to [secure@hcl.com](mailto:secure@hcl.com).

The complaints raised via this channel are investigated and handled with utmost fairness and confidentiality by the Internal Complaints Committee (“ICC”). HCLTech further ensures that standard SLAs as per law are met.

**False Accusation:** Where the ICC arrives at the conclusion that the allegation against the respondent is malicious, or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false, or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take suitable action viz. written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments,

terminating the perpetrator from service or undergoing a counselling session or carrying out community service. This does not, however, include complaints that are difficult to prove or have been made in good faith.

**Right to appeal:** Any person aggrieved from the recommendations made may prefer an appeal to the court or tribunal, within the stipulated period in accordance with the manner as may be prescribed, without prejudice to provisions contained in any other law for the time being in force.

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

Yes

**9. Assessments of the year**

| Particulars                 | % of plants and offices that were assessed (by entity or statutory authorities or third parties) |
|-----------------------------|--|
| Child labour                | 75%  |
| Forced / involuntary labour | 75%  |
| Sexual harassment           | 75%  |
| Discrimination at workplace | 75%  |
| Wages                       | 75%  |
| Others – please specify     | -  |

**10. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above.**

No significant risk / concern identified.

**Leadership Indicators:**

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

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

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

An independent third-party human rights assessment was conducted which covered 75% of Company's office locations as per employee headcount. The Company has incorporated human rights aspects into the due diligence process for onboarding any new vendor.

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

Yes.

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

| Particulars                 | % of value chain partners (by value of business done with such partners) that were assessed                                       |
|-----------------------------|---|
| Sexual harassment           | The Company's framework for assessment is a risk based one and not just based on the value of business.                           |
| Discrimination at workplace |   |
| Child labour                | The Company ensures communication to all vendors through incorporation of relevant contractual clauses in the agreement executed. |
| Forced/involuntary labour   |   |
| Wages                       | 100% of new vendor due diligences cover these topics.   |
| Others – please specify     | Covered as part of vendor risk assessment of selected high-risk vendors.  |

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

Appropriate trainings and capacity buildings are conducted based on the concerns arising from the assessments.

**PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment**

**Essential Indicators:**

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

| Parameter   | Unit         | FY 2022-23       | FY 2021-22     |
|---|--------------|------------------|----------------|
| Total electricity consumption (A)   | GJ           | 973,417.28       | 888,909.00     |
| Total fuel consumption (B)  | GJ           | 44,080.16        | 35,445.3       |
| Energy consumption through other sources (C)  | GJ           | -                | -              |
| <b>Total energy consumption (A+B+C)</b>   | <b>GJ</b>    | <b>1,017,497</b> | <b>924,354</b> |
| Energy intensity per rupee of turnover<br>(Total energy consumption / turnover in rupees) | GJ/Million ₹ | 1.00             | 1.07           |

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

Yes, the independent assurance of BRSR and Sustainability Report was conducted by Ernst & Young Associates LLP and Assurance Statement is a part of respective reports. In addition, independent assurance for quantification and reporting of greenhouse gas emissions and removals was conducted by BSI against ISO 14064-1:2018.

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

Not Applicable.

**3. Provide details of the following disclosures related to water, in the following format:**

| Parameter   | FY 2022-23     | FY 2021-22     |
|---|----------------|----------------|
| <b>Water withdrawal by source (in kilolitres) all values in KL</b>                    |                |                |
| (i) Surface water   | -              | -              |
| (ii) Groundwater  | 286,101.20     | 311,277        |
| (iii) Third party water (Tanker and drinking water supplies)                          | 342,432.63     | 231,972        |
| (iv) Seawater / desalinated water   | -              | -              |
| (v) Others (Rainwater and Municipality water)   | 244,154.00     | 156,070.23     |
| <b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>       | <b>872,688</b> | <b>699,319</b> |
| <b>Total volume of water consumption (in kilolitres)</b>                              | <b>863,373</b> | <b>675,866</b> |
| <b>Water intensity per rupee of turnover (Water consumed / turnover) KL/Million ₹</b> | <b>0.85</b>    | <b>0.79</b>    |

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

Yes, the independent assurance of BRSR and Sustainability Report was conducted by Ernst & Young Associates LLP and Assurance Statement is a part of respective reports. In addition, independent assurance for quantification and reporting of greenhouse gas emissions and removals was conducted by BSI against ISO 14064-1:2018.

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

97% of HCL's sewage water is treated at HCLTech's sewage treatment plants. Furthermore, the treated water is re-used at its campuses. Only 3% of the sewage water is sent to the common STPs run by the local municipalities.

**5. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:**

This is not a material aspect.

6. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format:

| Parameter  | Unit  | FY 2022-23  | FY 2021-22  |
|--|---|-------------|-------------|
| <b>Total Scope 1 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available) | Metric tonnes of CO <sub>2</sub> equivalent     | 15,878      | 18,765      |
| <b>Total Scope 2 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available) | Metric tonnes of CO <sub>2</sub> equivalent     | 157,865     | 143,642     |
| <b>Total Scope 1 and Scope 2 emissions per rupee of turnover</b>   | <b>MT CO<sub>2</sub> Equivalent / Million ₹</b> | <b>0.17</b> | <b>0.18</b> |

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

Yes, the independent assurance of BRSR and Sustainability Report was conducted by Ernst & Young Associates LLP and Assurance Statement is a part of respective reports. In addition, independent assurance for quantification and reporting of greenhouse gas emissions and removals was conducted by BSI against ISO 14064-1:2018.

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

Yes. HCLTech participated in several green projects that included increasing the percentage of renewable energy in its energy mix via power purchase agreements, energy efficiency measures that focused on optimization of chiller, EOL replacement of UPS, HVAC High side and Low side, ATCS Operation Elevator & STP operations. Additionally, the Company has started an EV conveyance initiative for its employees in the Southern Region in India which is also aimed at reducing the overall GHG emissions of the Company.

8. Provide details related to waste management by the entity, in the following format:

| Parameter  | FY 2022-23      | FY 2021-22      |
|--|-----------------|-----------------|
| <b>Total waste generated (in metric tonnes)</b>  |                 |                 |
| Plastic waste (A)  | 28.44           | 14.72           |
| E-waste (B)  | 383.55          | 127.0           |
| Bio-medical waste (C)  | 3.97            | 3.9             |
| Construction and demolition waste (D)  | 29.10           | -               |
| Battery waste (E)  | 67.60           | 392.08          |
| Used Oil DG (F)  | 8.51            | 13.16           |
| Other Hazardous waste. Please specify, if any. (G)<br>(DG Filter, DG Coolant Oil & Oil-Soaked Cotton Waste)  | 2.69            | 2.08            |
| Other Non-hazardous waste generated (H). Please specify, if any.<br>(Break-up by composition i.e. by materials relevant to the sector)<br>(Food Waste, Paper and Tissue, Garden Waste, Wooden waste, Carton box, Thermocol Waste, Tin waste, Shredding Papers, Metal Waste & Sanitary waste) | 1,468.30        | 521.65          |
| <b>Total (A+B + C + D + E + F + G + H)</b>   | <b>1,992.16</b> | <b>1,074.59</b> |

**For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)**

| Category of waste               | FY 2022-23      | FY 2021-22 |
|---------------------------------|-----------------|------------|
| (i) Recycled                    | 1,525 MT        | -          |
| (ii) Re-used                    | 85 MT           | -          |
| (iii) Other recovery operations | 0               | -          |
| <b>Total</b>                    | <b>1,610 MT</b> | <b>-</b>   |

**For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)**

| Category of waste               | FY 2022-23  | FY 2021-22 |
|---------------------------------|-------------|------------|
| (i) Incineration                | 8 MT        | -          |
| (ii) Landfilling                | 0           | -          |
| (iii) Other disposal operations | 0           | -          |
| <b>Total</b>                    | <b>8 MT</b> | <b>-</b>   |

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

Yes, the independent assurance of BRSR and Sustainability Report was conducted by Ernst & Young Associates LLP and Assurance Statement is a part of respective reports. In addition, independent assurance for quantification and reporting of greenhouse gas emissions and removals was conducted by BSI against ISO 14064-1:2018.

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

The details are as mentioned below:

- E-waste – The Company’s E-waste management practices focus on reducing electronic waste, promoting responsible disposal and recycling practices, and maximizing the lifespan of IT equipment to minimize the environmental impact and promote sustainability. The Company’s initiatives are briefly listed below:
  - Responsible IT Asset Disposal: Ensured implementation of proper disposal practices for IT assets at the end of their lifecycle, through partnership with certified e-waste recyclers, dismantlers / refurbishers who follow environmentally responsible processes. The goal is to ensure that IT equipment are recycled or disposed of in a manner that minimizes environmental impact and complies with E-waste handling and management guidelines.
  - IT Equipment Recycling: Collected, segregated and disposed IT Scrap in designated storerooms and initiated disposal process through verified E-waste handlers / recyclers with time bound disposal activity.
  - Employee Awareness and Training: Educated relevant team members on the importance of IT waste and guidelines for responsible IT asset management. Training sessions and awareness campaigns were organized to promote proper recycling and data wiping before disposal.
  - Performance Monitoring and Reporting: Ensured regular monitoring and reporting on IT waste metrics, such as the quantity of electronic waste generated, stored and recycling rates, to track progress and identify areas for improvement.
- Paper – With the aim of reducing paper consumption, initiatives like printer pin deployment, printer on alternate floors, setting up maximum printing limit, double side printing and reduction in font size are encouraged. These measures have resulted in significant conservation of paper.
- Reduce, Recycle, Reuse – The waste management programs are based on the principles of 3R’s. All waste generated by HCL is measured and quantified. The waste is categorized according to the source and disposal method. Hazardous waste is disposed of in an environmentally friendly manner and paper waste is recycled and reused. Bio medical waste is disposed of in a safe manner. Food remains and garden waste are used to make manure.
- Plastic - In line with the Central & State Govt. (India) Directives in the year 2018, HCLTech has made all its campuses in India free from ‘Single use plastics’ through alternative arrangements from the year 2019.
- Other hazardous waste – Other hazardous wastes that include bio medical waste & sanitary napkin waste is disposed in a safe manner.

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

Not Applicable

**11. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year (FY 2022-23):**

Not Applicable

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

Yes

| S. No.         | Specify the law / regulation / guidelines which was not complied with | Provide details of the non compliance | Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts | Corrective action taken, if any |
|----------------|---|---------------------------------------|---|---------------------------------|
| Not Applicable |   |                                       |   |                                 |

**Leadership Indicators:**

1. Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format:

| Parameter   | Unit | FY 2022-23        | FY 2021-22        |
|---|------|-------------------|-------------------|
| <b>From renewable sources</b>                               |      |                   |                   |
| Total electricity consumption (A)                           | GJ   | 178,785.52        | 159,677.00        |
| Total fuel consumption (B)                                  | GJ   | -                 | -                 |
| Energy consumption through other sources (C)                | GJ   | -                 | -                 |
| <b>Total energy consumed from renewable sources (A+B+C)</b> | GJ   | <b>178,785.52</b> | <b>159,677.00</b> |

|   |    |                   |                   |
|---|----|-------------------|-------------------|
| <b>From non-renewable sources</b>                               |    |                   |                   |
| Total electricity consumption (D)                               | GJ | 794,631.75        | 729,232.00        |
| Total fuel consumption (E)                                      | GJ | 44,080.16         | 35,445.30         |
| Energy consumption through other sources (F)                    | GJ | -                 | -                 |
| <b>Total energy consumed from non-renewable sources (D+E+F)</b> | GJ | <b>838,712.00</b> | <b>764,677.00</b> |

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

Yes, the independent assurance of BRSR and Sustainability Report was conducted by Ernst & Young Associates LLP and Assurance Statement is a part of respective reports. In addition, independent assurance for quantification and reporting of greenhouse gas emissions and removals was conducted by BSI against ISO 14064-1:2018.

2. Provide the following details related to water discharged:

| Parameter  | FY 2022-23   | FY 2021-22       |
|--|--------------|------------------|
| <b>Water discharge by destination and level of treatment (in kilolitres)</b> |              |                  |
| (i) To Surface water   | -            | -                |
| - No treatment   | -            | -                |
| - With treatment – please specify level of treatment                         | -            | -                |
| (ii) To Groundwater  |              |                  |
| - No treatment   | -            | -                |
| - With treatment – please specify level of treatment                         | -            | -                |
| (iii) To Seawater  | -            | -                |
| - No treatment   | -            | -                |
| - With treatment – please specify level of treatment                         | -            | -                |
| (iv) Sent to third parties   |              |                  |
| - No treatment   | 9,315        | 23,453.06        |
| - With treatment – please specify level of treatment                         | -            | -                |
| (v) Others (STP-Treated water)   | -            | -                |
| - No treatment   | -            | -                |
| - With treatment – please specify level of treatment                         | -            | -                |
| <b>Total water discharged (in kilolitres)</b>                                | <b>9,315</b> | <b>23,453.06</b> |

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



Yes, the independent assurance of BRSR and Sustainability Report was conducted by Ernst & Young Associates LLP and Assurance Statement is a part of respective reports. In addition, independent assurance for quantification and reporting of greenhouse gas emissions and removals was conducted by BSI against ISO 14064-1:2018.

**3. Water withdrawal, consumption and discharge in areas of water stress (in kilolitres): For each facility / plant located in areas of water stress, provide the following information:**

- (i) Name of the area:
- (ii) Nature of operations:
- (iii) Water withdrawal, consumption and discharge in the following format:

Not Applicable.

**4. Please provide details of total Scope 3 emissions & its intensity, in the following format:**

| Parameter  | Unit                             | FY 2022-23 | FY 2021-22 |
|--|----------------------------------|------------|------------|
| <b>Total Scope 3 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available) | MT CO <sub>2</sub> e             | 277,267    | 229,973    |
| <b>Total Scope 3 emissions per rupee of turnover</b>   | MT CO <sub>2</sub> e / Million ₹ | 0.27       | 0.26       |

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

Yes, the independent assurance of BRSR and Sustainability Report was conducted by Ernst & Young Associates LLP and Assurance Statement is a part of respective reports. In addition, independent assurance for quantification and reporting of greenhouse gas emissions and removals was conducted by BSI against ISO 14064-1:2018.

**5. With respect to the ecologically sensitive areas reported at Question 10 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.**

Not Applicable.

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

| Initiative undertaken                             | Details of the initiative (Web-link, if any, may be provided along-with summary) | Outcome of the initiative |
|---|--|---------------------------|
| <b>GHG Reduction Initiatives-tCO<sub>2</sub>e</b> |  |                           |
| Renewable Energy                                  | Renewable Power Purchase   | 24624.46                  |
| Energy Efficiency                                 | Chiller Operational Performances Improvement                                     | 143.75                    |
| Energy Efficiency                                 | HVAC Operational Performances Improvement  | 827.73                    |
| Energy Efficiency                                 | Energy Efficient Lighting & Controls   | 498.18                    |
| Energy Efficiency                                 | Effective utilization of UPS   | 94.91                     |
| Energy Efficiency                                 | Elevator & STP Operation optimization  | 21.57                     |
| Energy Efficiency                                 | Solar water Heater   | 0                         |
| <b>Water Saving Initiatives- Water saved (ml)</b> |  |                           |
| Water Management                                  | STP Treated Water use  | 7.86                      |
| Water Management                                  | Water Aerators   | 0                         |
| Water Management                                  | Sensor Based water Taps  | 2.91                      |
| Water Management                                  | Water efficient Operational control  | 25.63                     |

**Note:** For additional details, refer to our Sustainability Report.

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

Technological, geopolitical, societal, economic, and environmental risks are all coming together to create an intrinsically complex and fast-changing global risk landscape. The Company's reputation as a 21<sup>st</sup> Century Enterprise is often measured by its resilience to threats, and how efficiently The Company respond & manage business disruptions. HCLTech is committed to its employees, clients, and interested parties to ensure that necessary efforts are made to safeguard life and safety of personnel, protect property and resume critical services at predefined levels in the event of any untoward incident. To meet the organizational continuity objective, The Company have made significant efforts towards Crisis Management and Resilience planning to ensure effective response, prioritized recovery of its time-sensitive operations and mitigation of potential business continuity risks.

Crisis and Resilience (“C&R”) Program falls under the purview of Risk and Compliance function headed by the Chief Risk Officer of HCLTech. The C&R Program is guided by the board, led by subject matter experts, and is based on ISO 22301 standard and global best practices. The Company undertake active engagement with ecosystem partners for real-time horizon scanning of risks and early warning signals. The Company has embedded Resilience-by Design philosophy in the firm across different dimensions of the “new-normal” including resilience in work, workforce, workplace, technology, supply chain, and leadership. The Company has started integrating climate change risks into each of these dimensions and their business continuity / contingency planning solutions.

Being an IT / ITeS provider, there is a potential that our operations may be affected due to core-technical risks materializing in our environment like technology failures, programming errors, cyberattacks etc. In order to mitigate these risks, The Company has embedded ‘Resilience-by-Design’ across our organization through:

- Battle hardened Business Continuity & Disaster Recovery Plans including Cyber Incident readiness
- Geographically dispersed Data Centers
- Robust multi-vendor MPLS & Internet Network
- Scalable Work from Home (WFH) Computing capability with stringent security controls

HCLTech's Exercising and Testing Framework provides a comprehensive approach to validate effectiveness of the business continuity strategies implemented across the organization. The Company conduct exercises at facility, city, country level(s) based on nature, scale, and complexity of operations. Types of business continuity exercises include (1) Call Tree, (2) Tabletop and (3) Simulation.

Furthermore, our Crisis Management Framework provides agile response, timely communication with internal and external stakeholders, and recovery & restoration based on the rapidly evolving global threat landscape, which includes climate threats.

**8. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard?**

There were no significant adverse impacts to the environment arising from the value chain of HCLTech.

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

| S.No. | No. of value chain partners that were assessed | % of value chain partners (by value of business done with such partners) that were assessed  | Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard                             |
|-------|--|--|---|
| 1     | 1,046  | The Company does not monitor the percentage of value chain partners by the value of business. However, as part of its Vendor Risk Management Program, the Company take a risk based approach to execute vendor assessment. There were 406 vendors which were noted to be relevant from EHS domain perspective. | 57 findings relating to EHS practices were identified. As of 31 <sup>st</sup> March, 2023, 20 findings were addressed with appropriate corrective actions implemented and closed and the rest 37 are being attended to. |

**PRINCIPLE 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent**

**Essential Indicators:**

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

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

| S. No. | Name of the trade and industry chambers / associations      | Reach of trade and industry chambers / associations (State / National)  |
|--------|---|---|
| 1      | World Economic Forum ("WEF") and WEF Global Parity Alliance | Ever since the Company joined WEF at Davos, it has always made its presence felt on the global platform of Thought Leadership, Innovation and Technological Dialogues towards the Humanitarian and Socio-Economic World Order. Additionally, HCLTech a WEF Global Parity Alliance founding member. Established in collaboration with McKinsey & Company, the Global Parity Alliance seeks to promote diversity, equity & inclusion ("DE&I") best practices that benefit underrepresented groups and are hardwired across business processes – including creating equitable work opportunities, promoting supplier diversity, and launching inclusive products and services. The Global Parity Alliance's vision is to drive better and faster DE&I improvements by sharing what works, raising each other's aspirations, and elevating DE&I actions across organizations beyond the Alliance. <a href="https://www.wherewomenwork.com/Career/4315/HCL-WEHCLTechGlobal-Parity-Alliance">https://www.wherewomenwork.com/Career/4315/HCL-WEHCLTechGlobal-Parity-Alliance</a> .   |
| 2      | UN Women  | Men hold a disproportionate level of power across cultures globally, but they remain largely absent from the gender equality conversation. Similar to other human rights and social justice movements like Black Lives Matter and LGBTQIA+ equality, gender equality requires action and allyship across all of society. A flagship initiative of UN Women, the United Nations entity for Gender Equality, the HeForShe solidarity movement is an international platform that invites and engages men and boys to complement the work of the women's movement and create an equal world for all.  |
| 3      | UNGC  | HCLTech supports the Ten Principles of the United Nations Global Compact on human rights, labour, environment, and anti-corruption as a Participant Member. We are committed to making the UN Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals. HCLTech has made a clear statement of this commitment to our stakeholders and the general public. HCLTech has become first MNC with headquarters in India to become member of the Water Resilience Coalition. We have also endorsed the CEO Water Mandate under the UNGC.  |
| 4      | NASSCOM   | HCLTech has been one of the founding members of National Association of Software Services Companies since 1999 and has extended its vitality towards the apex Chamber of Software Service Companies in India as well as across its Global Trade contours.   |
| 5      | Other Industry Associations                                 | HCLTech has an active association with most country-specific trade bodies and institutions like CII, FICCI, IGCC, IFCCI, AIMA, CIPL, Women's Executive Forum, Indo-Spanish Chamber of Commerce & Industry, Swiss India Business Hub, Business Sweden, and works very closely with Department of International Trade, Invest India, Sweden Trade and Invest, Invest in Denmark, Australian Trade and Investment Commission (Austrade), Invest in Hessen ("HTAI"), Germany Trade & Invest ("GTAI"), Invest in Bavaria, Invest in Saxony, Invest in Lower Saxony, Invest in Romania, Invest in Spain, British Chambers of Commerce, London & Partners, Portuguese Trade and Investment Agency, Eschborn Economic Development Agency, Frankfurt RheinMain, Netherlands India Chamber of Commerce & Trade, Netherlands Foreign Investment Agency, Invest in Holland, Flanders Investment and Trade, Ireland India Business Association, Industrial Development Agency Ireland, Invest Bulgaria, Business Finland, Singapore Economic Development Board, Indian Embassies across regions where HCLTech has a presence, Swiss-Indo Chamber of Commerce, Invest Stockholm, Institute for Democracy and Economic Affairs Malaysia. |
| 6      | Think-tanks   | HCLTech is a member of leading think-tanks such as Chatham House, Friends of Europe ("FoE").  |

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

There were no incidents pertaining to anti-competitive conduct by the Company.

#### **Leadership Indicators:**

1. Details of public policy positions advocated by the entity

Yes, the Company believes in the public good and rightly so as part of its responsible socio-economic behavior that is carried forward towards various platforms, advocacy channels and forums by way of lending company's ideas, visions expertise and thought leadership. The Company has aligned itself with relevant organizations which work in the larger business / social / environmental and community interests. In addition, the Company also creates and owns innovative pieces of work and solutions. The Company has not taken any specific public policy advocacy during the course of this year.

**PRINCIPLE 8: Businesses should promote inclusive growth and equitable development**

**Essential Indicators:**

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

Not Applicable.

- 2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:**

Not Applicable

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

The corporate social responsibility agenda for HCLTech is delivered by the HCL Foundation. It deeply upholds the value of accountability and aims to accept, assess, and resolve feedback or complaints received from our community of stakeholders ranging from but not limited to HCL Foundation employees, HCLTech employees, volunteers, third-party employees, consultants associated with our projects, NGO partners, social sector organizations, government authorities, programme participants, community members and others. Any deviation from the law of the land, HCLTech Code of Conduct or HCL Foundation Child Protection Policy by any stakeholder associated with our programmes / projects is taken up seriously for review and redressal via multi-pronged, scientific and transparent channels. HCL Foundation aims to ensure that every stakeholder is provided a safe environment to share their concerns/grievances. High level of confidentiality is maintained in sensitive matters to respect and maintain dignity of the complainant. Redressal on grievances is carried out as per the nature of the grievance, basis guidelines defined in the organization’s policies.

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

|   | <b>FY 2022-23 (%)</b> | <b>FY 2021-22 (%)</b> |
|---|-----------------------|-----------------------|
| Directly sourced from MSMEs / small producers                       | 5.39                  | 5.29                  |
| Sourced directly from within the district and neighboring districts | 89.02                 | 88.67                 |

**Leadership Indicators:**

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

Not Applicable.

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

| <b>S.No</b> | <b>State</b>      | <b>Aspirational District</b> | <b>Amount Spent (in ₹)</b> |
|-------------|-------------------|------------------------------|----------------------------|
| 1.          | Chhattisgarh      | Bastar                       | 10,000,000                 |
| 2.          | Jammu And Kashmir | Baramulla                    | 2,000,000                  |
| 3.          | Jammu And Kashmir | Kupwara                      | 2,000,000                  |
| 4.          | Jharkhand         | Ranchi                       | 2,500,000                  |
| 5.          | Madhya Pradesh    | Guna                         | 8,000,000                  |
| 6.          | Odisha            | Malkangiri                   | 2,500,000                  |

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

Yes, the Company has a Procurement Policy that supports the development of, and will give special consideration to small, local, and diverse businesses. The definition of “diverse” is often specific to the country, however, it typically will include local minority, gender, veteran, sexual orientation, disability, economically disadvantaged, and other under-represented segments of a population.

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

HCLTech focuses on procuring from marginalized / vulnerable groups, such as, MBE (Minority Business Enterprise), WBE (Women Business Enterprise), VET (Veteran Owned Business), Disabled, LGBTQIA+ and small suppliers. The Company's procedures are also aligned to the local regulatory requirements across the countries where it operates.

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

For combined US, Canada & UK, the spend is ~34% of total procurement spend of these geographies.

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

Not Applicable.

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

Not Applicable.

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

| S. No. | CSR Project  | No. of persons benefited from CSR Projects  | % of beneficiaries from vulnerable and marginalized groups   |
|--------|--|---|--|
| 1.     | HCL Samuday - Program aims at developing a sustainable, scalable, and replicable model – a source code for economic and social development of rural areas in partnership with central and State Governments, local communities, NGOs, knowledge institutions and allied partners through optimal interventions across Agriculture, Education, Health, Infrastructure, Livelihood, and WASH (Water, Sanitation & Hygiene) in select villages of Hardoi district, Uttar Pradesh.                                     | 2.1 million                                 | 100%   |
| 2.     | HCL Uday - A multi-year, ongoing umbrella program, addressing urban poverty in HCL cities, with multiple projects under its ambit, aligned to thematic verticals (Health, Education, WASH, Skills, Environment).   | 0.89 million                                | 100%   |
| 3.     | HCL Grant - An ongoing umbrella program covering 3-4 years and 1-year grant-based projects, across India. It is aimed at strengthening and empowering the NGO ecosystem, engage with them, as well as recognize their path-breaking work. HCL Grant is awarded in three thematic categories: Environment, Health and Education. The Grant is designed to support breakthrough award-winning projects to NGOs, that have a proven track record of evident impact, high credibility and distinct ability to deliver. | 1.8 million                                 | 100%   |
| 4.     | Clean Noida - Program is aimed at carrying out works and services to implement effective solid waste management in the city of Noida, Uttar Pradesh; towards the larger goal of transforming the city into a litter-and waste-free region, covering all Residential Welfare Associations and urban villages.   | 0.4 million                                 | In addition to vulnerable and marginalized groups, project also benefits primary stakeholders of waste management, including waste collectors and domestic helps, to enhance their capacity and increase their participation in the decision-making process. |
| 5.     | HCL Harit - HCL Harit is a multi-year, ongoing program working with urgency to mitigate the impacts of environmental degradation. The vision is to conserve, restore and enhance indigenous environmental systems and respond to climate change in a sustainable manner through community engagement.  | 14,371 People through environment education | 100%   |

|    |  |              |      |
|----|--|--------------|------|
| 6. | <p>DRR - DRR includes overall disaster management including disaster preparedness, relief, response, rehabilitation and build-back-better efforts by HCL Foundation anywhere in India.</p> <p>Mitigating impact on humans, nature including animals, wildlife and its habitats, any other aspects basis need and type of disaster/emergency.</p> | 0.36 million | 100% |
|----|--|--------------|------|

**PRINCIPLE 9: Businesses should engage with and provide value to their consumers in a responsible manner.**

**Essential Indicators:**

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

The Company has a dedicated client-cadence management system that enables periodic client cadences and strengthens trust as well as ensures better leadership engagement leading to higher client satisfaction. The Company's multi-layered client feedback framework not only captures the voice of the customer during the relationship lifecycle, but also has a well-oiled post feedback mechanism to address actions and client inputs on various dimensions.

Customer feedback is sought at both project level on a continuous basis and account level on an annual basis. The Company reach out to ~4000 clients across 650+ global Accounts for feedback on its services. The survey is administered by an independent third party. The synopsis is shared with respective entities to ensure continuous improvement.

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

- Environmental and social parameters relevant to the product
- Safe and responsible usage
- Recycling and/or safe disposal

The Company offers an integrated portfolio of products, solutions, and services, built around Digital, IoT, Cloud, Automation, Cybersecurity, Analytics, Infrastructure Management, and Engineering Services, amongst others. All its services and products are designed in a manner that integrates environmental and / or social benefits.

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

| Particulars                    | FY 2022-23               |                                   | Remarks | FY 2021-22               |                                   | Remarks |
|--------------------------------|--------------------------|-----------------------------------|---------|--------------------------|-----------------------------------|---------|
|                                | Received during the year | Pending resolution at end of year |         | Received during the year | Pending resolution at end of year |         |
| Data privacy                   | Nil                      | -                                 | -       | Nil                      | -                                 | -       |
| Advertising                    | Nil                      | -                                 | -       | Nil                      | -                                 | -       |
| Cyber-security                 | Nil                      | -                                 | -       | Nil                      | -                                 | -       |
| Delivery of essential services | Nil                      | -                                 | -       | Nil                      | -                                 | -       |
| Restrictive Trade Practices    | Nil                      | -                                 | -       | Nil                      | -                                 | -       |
| Unfair Trade Practices         | Nil                      | -                                 | -       | Nil                      | -                                 | -       |
| Other                          | Nil                      | -                                 | -       | Nil                      | -                                 | -       |

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

| Particulars       | Number | Reasons for recall |
|-------------------|--------|--------------------|
| Voluntary recalls | NIL    |                    |
| Forced recalls    |        |                    |

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

Yes. HCLTech has a well-established Information Security Management framework based on ISO 27001:2013. Information Security Management System policies, processes and guidelines are established to ensure confidentiality, integrity, and availability of customer data. These security policies are available to all users and aligned with the strategic direction of the organization. The cybersecurity

framework is based on the international National Institute Standards & Technology (“NIST”) standards and subject to a variety of internal and external assessments on an on-going basis. HCLTech has a robust governance approach across the 3 lines of defense to continuously mature our cyber security posture including periodic reporting to the executive management and audit committee of the board. HCLTech is certified to ISO / IEC 27001:2013, ISO 22301:2019 and assessed for SOC 1 & SOC 2, Type II at the entity level.

HCLTech’s privacy program is designed, implemented and maintained by well-resourced Global Privacy Office which is led by the Chief Privacy Officer and is part of HCL’s Risk and Compliance division. HCLTech has designed Privacy program taking into account global privacy regulations that govern the collection, use and handling of personal data and derived privacy principles from EU’s General Data Protection Regulation (“GDPR”) and Generally Accepted Privacy Principles applicable to HCL either in a Controller or Processor capacity. The program is supported by a privacy compliance framework that is tailored to accommodate HCL’s operations, the nature of personal data processed, foreseen privacy and data protection risks, legal, regulatory & contractual obligations, and defined privacy principles. HCL has robust documented procedures approved by Senior Management and is accessible to employees through the company’s intranet. HCLTech is also certified for ISO 27701:2019 Privacy Information Management Systems. HCLTech’s privacy and data protection related documents (policies, procedures etc.) undergo periodic refresh and at least annually.

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

HCLTech has a well-defined, approved Information Cyber Security and Privacy Incident Handling Procedure implemented across all projects and departments. Security incidents, including privacy incidents, are reported to the Information CyberSecurity Incident Handling team, analyzed for the root cause, and corrective and preventive action is taken till the issue is closed. Additionally, HCLTech has developed an online tool for logging security and privacy incidents.

**Leadership Indicators:**

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

<https://www.hcltech.com>

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

Not Applicable.

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

Not Applicable.

**4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes / No / Not Applicable) If yes, provide details in brief.**

Not Applicable.

**5. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes / No)**

Yes.

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

**a) Number of instances of data breaches along-with impact:**

No material breaches.

**b) Percentage of data breaches involving personally identifiable information of customers:**

Nil, as there were no material breaches.

## Independent Assurance Statement

### The Management and Board of Directors

HCL Technologies Limited  
Noida (Uttar Pradesh), India

### Scope

We have been engaged by HCL Technologies Limited to perform Independent Limited assurance, as defined by International Standards on Assurance Engagements (ISAE 3000), hereafter referred to as the engagement, to report on HCL Technologies Limited BRSR (Business Responsibility and Sustainability Report) Report (the "Subject Matter") for the period from 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2023.

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the Report, and accordingly, we do not express a conclusion on this information.

### Criteria applied by HCL Technologies Limited

In preparing the Business Responsibility and Sustainability Report (BRSR) FY 23, HCL Technologies Limited applied Securities and Exchange Board of India (SEBI) BRSR guidelines. As a result, the subject matter information may not be suitable for another purpose.

### HCL Technologies Limited Responsibilities

HCL Technologies Limited management is responsible for selecting the Criteria, and for presenting the Business Responsibility and Sustainability Report (BRSR) FY 23 in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records, and making estimates relevant to the preparation of the subject matter, such that it is free from material misstatement, whether due to fraud or error.

### EY's Responsibilities

Our responsibility is to express a conclusion on the presentation of the Subject Matter based on the evidence we have obtained.

We conducted our engagement in accordance with the International Standard for Assurance Engagements Other Than Audits or Reviews of Historical Financial Information ('ISAE 3000'). The terms of reference for this engagement as agreed with HCL Technologies Limited. The Subject Matter is presented in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusions.

### Our Independence and Quality Control

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, and have the required competencies and experience to conduct this assurance engagement.

EY also applies International Standard on Quality Control 1, Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements, and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

### Description of procedures performed

Procedures performed in a limited assurance engagement vary in nature and timing from and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the Business Responsibility and Sustainability Report (BRSR) FY 23 and related information and applying analytical and other appropriate procedures.



Our procedures included:

- ▶ Conducted interviews with select personnel at corporate teams to understand the process for collecting, collating, and reporting the subject matter as per Standards and Securities and Exchange Board of India (SEBI) BRSR guidelines;
- ▶ Checked that the calculation criteria have been correctly applied in accordance with the methodologies outlined in the Criteria;
- ▶ Undertook analytical review procedures to support the reasonableness of the data through consultations with the site team and sustainability team;
- ▶ Review of relevant data, on a selective test basis, for the following units/ locations, through consultations with the site team and sustainability team
- ▶ Review of data on a sample basis, at the above-mentioned locations, pertaining to the following disclosures of the BRSR Guidelines:
  - Environmental Topics: Energy (P6.1, P6.9), Water (P6.2), Emissions (P6.4, P6.12), Waste ( P6.5);
  - Social Topics: New employee hires and employee turnover (General disclosure), Unions of associations (P3.5), Performance and Career Development Reviews (P3.7), No. of CSR projects in aspirational districts (P8.4), Total beneficiaries of CSR Projects (P8.6)
- ▶ Execution of an audit trail of claims and data streams, on a selective test basis, to determine the level of accuracy in the collection, transcription, and aggregation processes followed.
- ▶ Review of the Company's plans, policies, and practices, pertaining to their social, environmental, and sustainable development, to be able to make comments on the fairness of and Integrated Reporting;
- ▶ Review of the Company's approach towards materiality assessment disclosed in the Report to identify relevant issues;
- ▶ Review of select qualitative statements in various sections of the Business Responsibility and Sustainability Report (BRSR) FY 23.

We also performed such other procedures as we considered necessary in the circumstances

#### **Emphasis of matter**

The assurance scope excludes:

- ▶ Data and information outside the defined reporting period (1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2023)
- ▶ Data and information on the economic and financial performance of the Company
- ▶ Data, statements, and claims already available in the public domain through Annual Report, Integrated Annual Report, or other sources available in the public domain
- ▶ The Company's statements that describe the expression of opinion, belief, inference, aspiration, expectation, aim, or future intention provided by the Company
- ▶ The Company's compliance with regulations, acts, and guidelines with respect to various regulatory agencies and other legal matters

#### **Our Conclusion**

Based on our procedures and the evidence obtained, we are not aware of any material modifications that should be made to the Business Responsibility and Sustainability Report (BRSR) FY 23 for the period from 01<sup>st</sup> April 2022 to 31<sup>st</sup> March 2023, in order for it to be in accordance with the Standards and Securities and Exchange Board of India (SEBI) BRSR guidelines.

**Restricted use:** This report is intended solely for the information and use of HCL Technologies Limited and is not intended to be and should not be used by anyone other than HCL Technologies Limited.

**For and on behalf of Ernst & Young Associates LLP**

**Chaitanya Kalia**  
**16 June 2023**  
**Mumbai, India**