GOLD | Top 5%
ecovadis
Sustainability Rating
DEC 2024

Rated 'Gold' for our advanced sustainability performance

46% reduction in Scope 1 and 2 emissions and **22% reduction** in Scope 3 emissions compared to base year 2020

Business Responsibility and Sustainability Reporting

34.48% renewable energy across global operations

All HCLTech owned campuses in India received **TRUE Zero Waste to Landfill Platinum Certification**

Business Responsibility and Sustainability Reporting FY 2024–25

BRSR Statement of Director

We are pleased to share our Business Responsibility and Sustainability Report ("BRSR") for the fiscal year spanning April 1, 2024 to March 31, 2025 (FY25).

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

The company is committed to supercharging progress by bringing together its people and technology. It has a strong focus on next-gen technologies such as AI, Automation, IoT, Cybersecurity, Cloud, and Digital. HCLTech has also made significant acquisitions, including iconic IBM software brands like BigFix and AppScan, helping its software unit achieve over $1 billion in annual recurring revenue.

HCLTech is recognized for its commitment to people, communities, and the planet. The company has been ranked as a top employer in seventeen countries and has impacted the lives of over 7 million people through HCLFoundation. HCLTech's Better Health Hackathon: #CodeForCovid19 was awarded the Guinness World Record for the largest healthcare technology solution competition in 2021.

Sustainability Awards

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

- Highest ranked India-headquartered company in **TIME magazine's World's Best Companies 2024**
- Recognized among the **World's Most Ethical Companies® 2025 by Ethisphere, for second year in a row**
- HCLTech received a **Gold certificate** (2024) from **EcoVadis**
- HCLTech is in the leadership segment with AA rating from **MSCI**
- HCLTech named one of the **best-performing ESG companies** in our industry and region by **Sustainalytics**
- Included in **S&P Global Sustainability Yearbook 2024**, for the third year in a row

Governance

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

The Environmental, Social and Governance ("ESG") committee of the board met on four occasions during FY25 to review and evaluate the performance on material aspects against our objectives.

Environmental Achievements

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

- Our energy consumption has decreased by 29% compared to base year FY 2019–20, with a notable 46% reduction in non-renewable energy usage
- Achieved a 46% reduction in scope 1 and 2 emissions compared to base year FY 2019–20
- Achieved a 22% reduction in scope 3 emissions compared to base year FY 2019–20
- Achieved a 34.38% of renewable energy across global operations
- The Company has impacted over 7.5 million lives with 54% female beneficiaries through its CSR arm, HCLFoundation, and helped over 15,000 persons with disability
- Planted over 3.2 million saplings, developed 358 water structures, rejuvenated 265 water bodies
- 100% TRUE Zero Waste to Landfill Platinum certification for all campuses in India

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

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

Simon John England
Chairperson – ESG & DEI Committee

Section A : General Disclosures

I. Details of the listed entity:

S. No.	Particulars	Details
1	Corporate Identity Number (CIN) of the Listed Entity	L74140DL1991PLC046369
2	Name of the Listed Entity	HCL Technologies Limited
3	Year of Incorporation	1991
4	Registered office address	806, Siddharth, 96, Nehru Place, New Delhi - 110019, India
5	Corporate address	Technology Hub, Special Economic Zone, Plot No. 3A, Sector 126, Noida - 201304, U.P., India
6	E-mail	investors@hcltech.com
7	Telephone	+91-120-4306000
8	Website	www.hcltech.com
9	Financial year for which reporting is being done	1st April 2024 to 31st March 2025
10	Name of the Stock Exchange(s) where shares are listed	National Stock Exchange of India Limited ("NSE"); BSE Limited ("BSE")
11	Paid-up Capital	The paid-up equity shares capital of HCL Technologies Limited as on March 31, 2025, is ₹542,73,30,192 /- comprising 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. Vipul Arora Global Head – Sustainability sustainability@hcltech.com +91-120-4306000
13	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together)	Disclosures made in this report are on a consolidated basis unless otherwise stated
14	Name of assurance provider	DNV Business Assurance India Private Limited ("DNV")
15	Type of assurance obtained	Reasonable Assurance for Core Indicators and Limited Assurance on selected other indicators.

II. Products/Services:

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

S. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Information and Communication (Revenue from operations)	Computer programming, consultancy, and related activities	100%

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

S. No.	Product/Service	NIC Code	% of total Turnover contributed
1	IT & Business Services ("ITBS") - The ITBS business segment improves consumer and employee experiences by empowering multinational corporations to conduct business transformation in an agile and sustainable way. It makes up the largest component of HCLTech's total revenue mix consisting of 4 segments: Digital Business Services, Digital Foundation Services, Digital Process Operations and EdTech Business Services	620	73.84%
2	Engineering and R&D Services ("ERS") - Engineering services and solutions in all aspects of product development and platform engineering		16.20%
3	HCLSoftware - Provisions of modernized software products to global clients for their technology and industry-specific requirements		9.96%

III. Operations:

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

Locations	Number of plants	Number of offices	Total
National	Not Applicable	58	58
International	Not Applicable	217	217

***Note:** HCLTech does not produce any physical products or owns/operates any manufacturing facilities/plants. Therefore, disclosure regarding number of plants is not applicable to the company.*

19. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States)	15
International (No. of Countries)	54

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

92.7%

***(Note:** This is for HCL Technologies Limited – Standalone Entity)*

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 and AI partner for Global 2000 companies as well as equivalent and emerging enterprises. In addition, HCLTech has a strategic objective aligned to the long-term value of building deep, strategic client relationships as a trusted partner. We focus on G2000, G2000 equivalent companies such as privately held or government-owned entities and emerging companies, which are the fastest-growing digital-native companies that are on a rapid growth track toward achieving G2000 status. HCLSoftware has a client universe that is broader and consistent with the business objectives of a software business. The key industry verticals that HCLTech caters primarily to are Financial Services, Manufacturing, Lifesciences & Healthcare, Technology & Services, Public Services#, Retail & CPG, and Telecommunications, Media, Publishing & Entertainment.

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

IV. Employees

20. Details as of March 31, 2025

a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female		Others	
			No (B)	% (B/A)	No (C)	% (C/A)	No (D)	% (D/A)
	Employees							
1	Permanent (E)	223,420	158,943	71.14%	64,364	28.81%	113	0.05%
2	Other than Permanent (F)	11,076	8,131	73.41%	2,853	25.76%	92	0.83%
3	**Total employees (E+F)**	**234,496**	**167,074**	**71.25%**	**67,217**	**28.66%**	**205**	**0.09%**
	Workers							
4	Permanent (G)							
5	Other than Permanent (H)			Not Applicable				
6	Total workers (G+H)							

Note:

- *Disclosing gender is voluntary for HCLTech employees. The employees who have not disclosed their gender are categorized as 'others'.*
- *The entire personnel of HCLTech are categorized as "Employees" and not as "Workers". Therefore, the information required in all sections in the "workers" category is not applicable to HCLTech.*

b.   Differently abled employees and workers

S. No.	Particulars	Total (A)	Male		Female		Others	
			No (B)	% (B/A)	No (C)	% (C/A)	No (D)	% (D/A)
Employees								
1	Permanent (E)	958	749	78.18%	207	21.61%	2	0.21%
2	Other than Permanent (F)	38	30	78.95%	8	21.05%	0	0.00%
3	**Total employees (E+F)**	**996**	**779**	**78.21%**	**215**	**21.59%**	**2**	**0.20%**
Workers								
4	Permanent (G)							
5	Other than Permanent (H)				Not Applicable			
6	Total workers (G+H)							

Note:

- *Disclosing gender is voluntary for HCLTech employees. The employees who have not disclosed their gender are categorized as 'others'.*
- *The entire personnel of HCLTech are categorized as "Employees" and not as "Workers". Therefore, the information required in all sections in the "workers" category is not applicable to HCLTech.*

21.   **Participation/Inclusion/Representation of women**

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

22.   **Turnover rate for permanent employees and workers**

Particulars	FY 2024–25				FY 2023-24				FY 2022-23			
	Male	Female	Others	Total	Male	Female	Others	Total	Male	Female	Others	Total
Permanent Employees	13.06%	12.81%	5.66%	12.99%	12.32%	12.72%	7.71%	12.42%	19.83%	18.60%	15.67%	19.50%
Permanent Workers	Not Applicable											

Note:

- *Attrition data provided by HCLTech is voluntary attrition % (LTM-IT Services).*
- *Disclosing gender is voluntary for HCLTech employees. The employees who have not disclosed their gender are categorized as 'others'.*
- *The entire personnel of HCLTech are categorized as "Employees" and not as "Workers". Therefore, the information required in all sections in the "workers" category is not applicable to HCLTech.*

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

23.   **(a) Names of holding/subsidiary/associate companies/joint ventures (As on March 31, 2025)**

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

S. No.	Name of the holding/subsidiary/associate companies/joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Actian Australia Pty Limited	Subsidiary	100%	Yes
2	Actian Corporation	Subsidiary	100%	Yes
3	Actian Europe Limited	Subsidiary	100%	Yes

S. No.	Name of the holding/subsidiary/associate companies/joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
4	Actian France SAS	Subsidiary	100%	Yes
5	Actian Germany GmbH	Subsidiary	100%	Yes
6	Actian International, Inc.	Subsidiary	100%	Yes
7	Actian Technology Private Limited	Subsidiary	100%	Yes
8	Anzopan Investments Pty Limited	Subsidiary	70%	Yes
9	ASAP Electronics GmbH	Subsidiary	100%	Yes
10	ASAP Engineering GmbH, Friedrichshafen	Subsidiary	100%	Yes
11	ASAP Engineering GmbH, Gaimersheim	Subsidiary	100%	Yes
12	ASAP Engineering GmbH, Russelsheim	Subsidiary	100%	Yes
13	ASAP Engineering GmbH	Subsidiary	100%	Yes
14	ASAP Engineering GmbH, Weyhausen	Subsidiary	100%	Yes
15	ASAP Holding GmbH	Subsidiary	100%	Yes
16	ASAP Quality Consulting GmbH	Subsidiary	100%	Yes
17	Axon Group Limited	Subsidiary	100%	Yes
18	Axon Solutions Limited	Subsidiary	100%	Yes
19	Butler America Aerospace LLC	Subsidiary	100%	Yes
20	C3i Europe Eood	Subsidiary	100%	Yes
21	C3i Japan GK	Subsidiary	100%	Yes
22	C3i Services &Technologies (Dalian) Co., Ltd	Subsidiary	100%	Yes
23	C3i Support Services Private Limited	Subsidiary	100%	Yes
24	CeleritiFintech Limited	Subsidiary	51%	Yes
25	CeleritiFintech Services Limited	Associate	49%	Yes
26	Confinale (Deutschland) GmbH	Subsidiary	100%	Yes
27	Confinale (UK) Limited	Subsidiary	100%	Yes
28	Dicturus Grundstücksverwaltungsgesellschaft mbH & Co. Vermietungs KG	Subsidiary	94%	Yes
29	DWS (New Zealand) Ltd	Subsidiary	100%	Yes
30	DWS (NSW) Pty Ltd	Subsidiary	100%	Yes
31	DWS Pty Limited	Subsidiary	100%	Yes
32	FIDUS Personal GmbH	Subsidiary	100%	Yes
33	Filial Espanola De HCL Technologies S.L	Subsidiary	100%	Yes
34	Geometric Americas, Inc.	Subsidiary	100%	Yes
35	Geometric China, Inc.	Subsidiary	100%	Yes
36	Geometric Europe GmbH	Subsidiary	100%	Yes
37	H C L Technologies Lanka (Private) Limited	Subsidiary	100%	Yes
38	HCL (Brazil) Tecnologia da Informacao LTDA	Subsidiary	100%	Yes
39	HCL (Ireland) Information Systems Limited	Subsidiary	100%	Yes

S. No.	Name of the holding/subsidiary/associate companies/joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
40	HCL (New Zealand) Limited	Subsidiary	100%	Yes
41	HCL America Inc.	Subsidiary	100%	Yes
42	HCL America Solutions Inc.	Subsidiary	100%	Yes
43	HCL Arabia LLC	Subsidiary	100%	Yes
44	HCL Argentina S.A	Subsidiary	100%	Yes
45	HCL Asia Pacific Pte. Ltd.	Subsidiary	100%	Yes
46	HCL Australia Services Pty. Limited	Subsidiary	100%	Yes
47	HCL Axon Solutions (Shanghai) Co. Limited	Subsidiary	100%	Yes
48	HCL Bermuda Limited	Subsidiary	100%	Yes
49	HCL Canada Inc.	Subsidiary	100%	Yes
50	HCL Comnet Systems & Services Limited	Subsidiary	100%	Yes
51	HCL EAS Limited	Subsidiary	100%	Yes
52	HCL Great Britain Limited	Subsidiary	100%	Yes
53	HCL Guatemala, Sociedad Anonima	Subsidiary	100%	Yes
54	HCL Hong Kong SAR Limited	Subsidiary	100%	Yes
55	HCL Insurance BPO Services Limited	Subsidiary	100%	Yes
56	HCL Investments (UK) Limited	Subsidiary	100%	Yes
57	HCL Istanbul Bilisim Teknolojileri Limited Sirketi	Subsidiary	100%	Yes
58	HCL Japan Limited	Subsidiary	100%	Yes
59	HCL Latin America Holding LLC	Subsidiary	100%	Yes
60	HCL Lending Solutions, LLC	Subsidiary	100%	Yes
61	HCL Muscat Technology LLC	Subsidiary	100%	Yes
62	HCL Poland Sp. z o.o	Subsidiary	100%	Yes
63	HCL Singapore Pte. Limited	Subsidiary	100%	Yes
64	HCL Software Products Limited	Subsidiary	100%	Yes
65	HCL Technologies (Beijing) Co., Ltd.	Subsidiary	100%	Yes
66	HCL Technologies (Proprietary) Ltd	Associate	48%	Yes
67	HCL Technologies (Shanghai) Limited	Subsidiary	100%	Yes
68	HCL Technologies (Taiwan) Ltd.	Subsidiary	100%	Yes
69	HCL Technologies (Thailand) Ltd.	Subsidiary	100%	Yes
70	HCL Technologies Angola (SU), LDA	Subsidiary	100%	Yes
71	HCL Technologies Austria GmbH	Subsidiary	100%	Yes
72	HCL Technologies Azerbaijan Limited Liability Company	Subsidiary	100%	Yes
73	HCL Technologies B.V.	Subsidiary	100%	Yes
74	HCL Technologies Bahrain W.L.L	Subsidiary	100%	Yes
75	HCL Technologies Belgium BV	Subsidiary	100%	Yes
76	HCL Technologies Bulgaria EOOD	Subsidiary	100%	Yes
77	HCL Technologies Chile SPA	Subsidiary	100%	Yes

S. No.	Name of the holding/subsidiary/associate companies/joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
78	HCL Technologies Columbia S.A.S	Subsidiary	100%	Yes
79	HCL Technologies Corporate Services Limited	Subsidiary	100%	Yes
80	HCL Technologies Costa Rica Sociedad De Responsabilidad Limitada	Subsidiary	100%	Yes
81	HCL Technologies Czech Republic s.r.o.	Subsidiary	100%	Yes
82	HCL Technologies Denmark Aps	Subsidiary	100%	Yes
83	HCL Technologies Egypt Limited	Subsidiary	100%	Yes
84	HCL Technologies Estonia OÜ	Subsidiary	100%	Yes
85	HCL Technologies Finland Oy	Subsidiary	100%	Yes
86	HCL Technologies France SAS	Subsidiary	100%	Yes
87	HCL Technologies gbs GmbH	Subsidiary	51%	Yes
88	HCL Technologies Germany GmbH	Subsidiary	100%	Yes
89	HCL Technologies Greece Single Member P.C	Subsidiary	100%	Yes
90	HCL Technologies Holding UK Limited	Subsidiary	100%	Yes
91	HCL Technologies Italy S.P.A	Subsidiary	100%	Yes
92	HCL Technologies Lithuania UAB	Subsidiary	100%	Yes
93	HCL Technologies Luxembourg S.a.r.l	Subsidiary	100%	Yes
94	HCL Technologies Malaysia Sdn. Bhd.	Subsidiary	100%	Yes
95	HCL Technologies Mexico S.De.R.L.De.C.V	Subsidiary	100%	Yes
96	HCL Technologies Middle East FZ–LLC	Subsidiary	100%	Yes
97	HCL Technologies Morocco Limited	Subsidiary	100%	Yes
98	HCL Technologies Norway AS	Subsidiary	100%	Yes
99	HCL Technologies Philippines Inc.	Subsidiary	100%	Yes
100	HCL Technologies Romania s.r.l.	Subsidiary	100%	Yes
101	HCL Technologies S.A.	Subsidiary	100%	Yes
102	HCL Technologies S.A.C.	Subsidiary	100%	Yes
103	HCL Technologies Slovakia s. r. o.	Subsidiary	100%	Yes
104	HCL Technologies Solutions GmbH	Subsidiary	100%	Yes
105	HCL Technologies South Africa (Proprietary) Limited	Associate	36%	Yes
106	HCL Technologies Starschema Kft.	Subsidiary	100%	Yes
107	HCL Technologies Sweden AB	Subsidiary	100%	Yes
108	HCL Technologies Switzerland AG (Formerly "Confinale AG")	Subsidiary	100%	Yes
109	HCL Technologies Trinidad and Tobago Limited	Subsidiary	100%	Yes
110	HCL Technologies UK Limited	Subsidiary	100%	Yes
111	HCL Technologies Vietnam Company Limited	Subsidiary	100%	Yes

S. No.	Name of the holding/subsidiary/associate companies/joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
112	HCL Training & Staffing Services Private Limited	Subsidiary	100%	Yes
113	HCL Vietnam Company Limited	Subsidiary	100%	Yes
114	Phoenix IT & T Consulting Pty Ltd	Subsidiary	100%	Yes
115	Projects Assured Pty Ltd	Subsidiary	100%	Yes
116	PT. HCL Technologies Indonesia Limited	Subsidiary	100%	Yes
117	Quest Informatics Private Limited	Subsidiary	100%	Yes
118	Sankalp Semiconductor Inc.	Subsidiary	100%	Yes
119	Sankalp Semiconductor Private Limited	Subsidiary	100%	Yes
120	Starschema Inc	Subsidiary	100%	Yes
121	Symplicit Pty Ltd	Subsidiary	100%	Yes
122	Versant GmbH	Subsidiary	100%	Yes
123	Wallis Nominees (Computing) Pty Ltd	Subsidiary	100%	Yes
124	Zeenea SAS	Subsidiary	100%	Yes
125	Zeenea Benelux	Subsidiary	100%	Yes
126	HCL Technologies Sdn Bhd	Subsidiary	100%	Yes
127	HCLTech Public Sector Solutions Inc.	Subsidiary	100%	Yes

VI. CSR Details

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

(ii) Turnover (in Rs.): 51,105 crores *(as per standalone financial statements)*

(iii) Net worth (in Rs.): 34,940 crores *(as per standalone financial statements)*

VII. Transparency and Disclosures Compliances

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

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No), If yes, then provide weblink for grievance redressal policy	FY 2024-25			FY 2023-24		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes https://www.hcltech.com/ corporate/corporate-social-responsibility-policy	0	0	Nil	0	0	Nil
Investors (other than shareholders)	Yes https://www.hcltech.com/investor-relations/investor-faq	0	0	Nil	0	0	Nil
Shareholders	Yes https://www.hcltech.com/investor-relations/investor-faq	8	0	Nil	15	0	Nil

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No), If yes, then provide weblink for grievance redressal policy	FY 2024–25			FY 2023–24		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Employees and workers	Yes https://www.hcltech.com/corporate/grievance-redressal-protocol https://www.hcltech.com/corporate/human-rights-policy https://www.hcltech.com/corporate/whistleblower-policy	16	8	Nil	30	17	Nil
Customers	Yes https://www.hcltech.com/corporate/whistleblower-policy	2	1	Nil	3	2	Nil
Value Chain Partners	Yes https://www.hcltech.com/corporate/supplier-code-conduct	2	0	Nil	1	1	Nil
Other (please specify)– Includes anonymous complaints	Yes https://www.hcltech.com/corporate/grievance-redressal-protocol	48	25	Nil	50	32	Nil

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

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Climate change	Risk and opportunity	Climate change poses both a physical and a transition risk to HCLTech's business operations. Physical risks include extreme weather events like droughts, floods, cyclones, wildfires and heat stress. Transition risks include changes in policy and regulatory context leading to increased carbon prices, taxes and cost of doing business. It also includes business continuity risks. The opportunity to be climate resilient and climate positive includes developing climate resilient processes, operations, value chain, products, services and solutions that not only support our journey but also that of our clients and partners.	As a part of our net- zero strategy, HCLTech is committed to limiting greenhouse gas emissions aligned to the 1.5°C pathway by 2030 and to achieving net zero by 2040. A clear roadmap is planned towards this commitment. We are making steady progress on this roadmap. HCLTech is also developing products, services and solutions that help clients and partners meet their commitments on climate change. HCLTech has continued its journey to identify and execute projects to work with communities to move towards a climate resilient future.	The financial implications of climate change risk are disruption to business operations and increased cost of doing business. The financial opportunity of being climate resilient and climate positive is enhanced business continuity, robust operations, cost saving and increased business revenues. Details are covered in the TCFD disclosures.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
2	Eco-efficiency	Risk and opportunity	Eco-efficiency is an opportunity for HCLTech to improve its operational efficiency on its ecological performance related to energy, waste, water and other resources.	HCLTech has implemented various energy efficiency initiatives to reduce energy consumption, water consumption and waste minimization. HCLTech has defined monitoring and governance systems covering all eco-efficiency parameters. These are reviewed at regular intervals and budgets are allocated for performance improvement.	Lower performance on eco-efficiency carries the risk of increased costs of doing business. Improvement in eco-efficiency directly leads to cost savings and resilient business operations.
3	Human Capital	Risk and opportunity	HCLTech defines human capital as skills, knowledge and experience possessed by an employee or a team, that can be valuable to the organization. We require constant upskilling and reskilling of our employees to ensure we deliver top services to our clients in a rapidly evolving digital technology space. Human capital is an important risk as well as opportunity for us.	HCLTech has a clear institutional mechanism to map future skillset requirements and has programs for upskilling and reskilling employees. There are measurements used to gauge the performance of the initiative, which are reviewed periodically.	The financial implication of the risk is potential loss of business opportunity if adequate and appropriate human capital is not available. Readiness on human capital creates opportunities to cater to client and business needs leading to revenue growth.
4	Local hiring	Opportunity	Hiring local talent in places where we do business is an important risk and opportunity for us.	Hiring locally is not just the right thing to do, but an effective strategy to improve talent retention. It also conveys our commitment to the community that we are invested in that location. Across the globe, in the countries where we operate, we are investing in local talent. As a strategy HCLTech has expanded its offices to smaller cities (New Vistas) and provided a hybrid workspace to further enable people prospects.	Improved talent retention and better relations with the community and clients lead to steady long term revenue growth and ability to deliver on that growth.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
5	Diversity and inclusion (D&I)	Risk and Opportunity	To maintain our innovative culture, we recognize the importance of diversity in thought, ideas and perspectives. There is ample evidence to highlight that having diverse perspectives in a team creates better work outcomes in addition to better team coherence and has a positive impact on creativity, problem-solving and overall organizational success.	HCLTech has clear policies, processes and governance structures to monitor the performance of our D&I strategy. We have an ESG and DEI Committee set up in our Board to ensure a strategic focus. Goals and targets are identified and integrated into the performance evaluation of leaders. A separate team works on various initiatives to further our commitment.	Absence of D&I robustness may lead to narrow perspectives that may impact quality and output of work. Robust presence of D&I may potentially lead to comprehensive solutions driving better business outcomes in addition to inclusive workplace. Inclusive workplace may drive better productivity, innovation and retention of talent.
6	Talent attraction and retention	Risk and Opportunity	Meeting the increasing demand for new talent poses a significant risk and a unique opportunity. The increasing shifts globally towards the adoption of digital solutions and increasing range and diversity of technology solutions have put the focus on striving the right balance between demand and supply of appropriate skillsets. We view it as an opportunity to align our work culture with global trends, thereby enhancing employee retention while also increasing their efficiency.	HCLTech's strategy is to focus on building the workplace of tomorrow—one which promotes equality of opportunity, a collaborative and transparent culture and deploys a robust training strategy designed to meet the development needs of employees at all levels. The company provides employees with progressive career paths through internal opportunities.	Failing to effectively attract and retain talented individuals can result in missed opportunities for growth and innovation, leading to decreased productivity and competitiveness. Additionally, the costs associated with recruiting, onboarding and training new employees are significant. On the other hand, successfully attracting and retaining the right talent leads to direct performance gains and ability to cater to new growth opportunities leading to better revenues.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
7	Work environment	Risk and opportunity	HCLTech identifies work environment as a material topic considering both the emotional and physical aspects of our employees.	Good workspaces, wellness spaces, creches, gyms, etc., are integral parts of our offices. It is also important to create an environment that is safe where employees have the confidence and trust to report on any kind of discrimination or harassment. We ensure that our offices are designed and planned to ensure the comfort of our employees. We have clear policies and processes to prevent any discrimination and harassment in our workplaces. These are communicated regularly and employees are encouraged to report on any incidents. We have tracking mechanisms to ensure we take preventive steps. Independent investigation of incidents is also ensured.	The comfort and trust of the employees in a good work environment results in dedicated employees. Hence the financial impact is a result of healthy and safe employees performing to their full potential. A workplace incident can result in a loss of reputation to the organization and this can result in potential loss of opportunities.
8	Citizenship	Opportunity	Corporate citizenship is not just an opportunity for HCLTech but rather it is the backbone of the organization. It is our responsibility to the community in which we operate.	HCLFoundation in India and the various employee councils around the world highlight our focus. Apart from the positive impact on the community members/program participants, our initiatives demonstrate our commitment to the communities in which we operate.	Outcomes resulting from improved trust and credibility in the community can bring potential financial opportunities for HCLTech.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
9	Sustainable impact on clients	Opportunity	As technology solutions are deployed at greater scale and complexity to solve major problems around the world, their sustainable and responsible use becomes critical to limit their footprint and to avoid unintended consequences.	As a leader in IT services, HCLTech is uniquely positioned to assist its clients to innovate through advanced technology and digitalization while being responsible in its usage. HCLTech already works with clients on several sustainable solutions. Therefore, we created a dedicated team which works with various sector heads to identify opportunities related to sustainability and create appropriate sustainability-related solutions for our clients.	The direct financial impact will emerge from the creation of new opportunities with clients. Indirect benefits include the creation of environmental and social capital.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
10	Cyber security, data protection and system availability	Risk and opportunity	Greater adoption of technology globally has led to increased incidents of cyberattacks and frauds. This has led to a greater focus on the need to build robust, secure and sophisticated solutions that are secure, safe and robust. Data privacy and security are critical features.	HCLTech ensures a globally interconnected oversight framework involving governance, policies, procedures, training and awareness programs, global privacy impact assessments, privacy by design, data mapping, third-party contractual oversight, incident management and a mechanism for monitoring regulatory compliance for every geography. Our Crisis & Resilience program highlights our focus on integrating resilience as an intrinsic part of our business operating model and seeks to embed "resilience by design" across the dimensions of work, personnel, workplace, business operations, technology, supply chain and leadership. Our Information and cybersecurity program ensures a strong security posture for HCLTech and our clients. Our security posture has been validated by independent, industry recognized certifications and attestation standards, including quarterly oversight by the Board. We also have cyber insurance that covers different types of breaches and cyber events.	Any incident has a direct impact on that specific project with the client or on HCLTech as an organization. It may lead to regulatory implications, reputational challenges and financial implications.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
11.	Sustainable Procurement	Risk and Opportunity	For sustainability to be effective at derisking the organization, it needs to be deployed beyond our internal operations to cover our supply chain. A supply chain that is at odds with our sustainability goals and priorities is a risk to our achievement of our goals.	Through responsible sourcing, collaboration with upstream and downstream partners and improving supply chain governance, HCLTech has integrated sustainability into its procurement process. Both the Supplier Code of Conduct and Procurement Policy has integrated sustainability requirements. ESG has been incorporated as a risk domain in the Vendor onboarding process for new vendors. HCLTech has also conducted risk evaluation of the supply chain based on ESG guidelines and identified categories and vendors who will be audited. The audit requirements are integrated into the Vendor Risk Management program (R&C).	Non-adherence to ESG guidelines in the supply chain can lead to associated reputation damage and thwart progress on our sustainability goals. Integration of our sustainability goals in our supply chain increases our effectiveness in meeting these goals and leads to greater positive impact.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
12	Governance and ethics	Risk and opportunity	The regulations around governance are significant and increasingly becoming more stringent around requirements on accountability, transparency and fairness.	HCLTech has stipulated policies, processes and systems to ensure ethical conduct and strong governance. Governance and Ethics are the foundations of the HCLTech culture. We structure our governance to permeate ethical conduct throughout the organization. Our strong governance and ethical culture ensure our viability over the long term. The Code of Business Ethics and Conduct (COBEC) is our principal document that outlines the way HCLTech employees should conduct business. The whistle-blower policy and various other reporting channels help to identify any challenges that need to be corrected. The Board reviews this periodically through the Audit Committee. We are focused on both current and future regulations to ensure we are fully prepared for any change.	Non-compliance with corporate governance regulations can have several financial implications and reputational consequences. Regulatory actions taken against the company can lead to penalties, fines and legal expenses, negatively impacting its financial performance. Moreover, there is a risk associated with incidents that may not be regulatory in nature but still raise questions about the ethical conduct of the business.

Section B : Management and Process Disclosures

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

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
	Policy and management process								
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
1. b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
1. c. Web Link of the Policies, if available	**Principle 1:** Code of Business Ethics and Conduct: https://www.hcltech.com/investor-relations/governance-policies/cobec Anti-Bribery & Anti-Corruption policy: https://www.hcltech.com/corporate/anti-bribery-and-anti-corruption-policy-abac Whistleblower Policy: https://www.hcltech.com/corporate/whistleblower-policy HCLTech Group Tax Strategy: https://www.hcltech.com/corporate/hcltech-group-tax-strategy-global **Principle 2:** Supplier Code of Conduct: https://www.hcltech.com/corporate/supplier-code-conduct Procurement Policy: https://www.hcltech.com/corporate/procurement-policy Code of Business Ethics and Conduct: https://www.hcltech.com/investor-relations/governance-policies/cobec Environmental Sustainability Policy: https://www.hcltech.com/corporate/environmental-sustainability-policy Occupational Health & Safety Policy: https://www.hcltech.com/corporate/occupational-health-safety-policy								

Disclosure Questsions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management process									

1. c. Web Link of the Policies, if available

Principle 3:

Supplier Code of Conduct:
https://www.hcltech.com/corporate/supplier-code-conduct

Procurement Policy:
https://www.hcltech.com/corporate/procurement-policy

Code of Business Ethics and Conduct:
https://www.hcltech.com/investor-relations/governance-policies/cobec

Occupational Health & Safety Policy:
https://www.hcltech.com/corporate/occupational-health-safety-policy

Remuneration Policy:
https://www.hcltech.com/corporate/remuneration-policy

HCLTech Group Tax Strategy:
https://www.hcltech.com/corporate/hcltech-group-tax-strategy-global

Human Rights Policy:
https://www.hcltech.com/corporate/human-rights-policy

Principle 4:

Dividend Distribution Policy:
https://www.hcltech.com/corporate/dividend-distribution-policy

Policy for determination of materiality of event or information:
https://www.hcltech.com/corporate/policy-determination-materiality-event-or-information

Related Party Policy:
https://www.hcltech.com/corporate/related-party-transaction-policy

Fair Disclosure Code:
https://www.hcltech.com/corporate/fair-disclosure-code

Code of Business Ethics and Conduct:
https://www.hcltech.com/investor-relations/governance-policies/cobec

Whistleblower Policy:
https://www.hcltech.com/corporate/whistleblower-policy

Principle 5:

Human Rights Policy:
https://www.hcltech.com/corporate/human-rights-policy

Code of Business Ethics and Conduct:
https://www.hcltech.com/investor-relations/governance-policies/cobec

Disclosure Quesstions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and management process									
1. c. Web Link of the Policies, if available	**Principle 6:** Environmental and Sustainability Policy: https://www.hcltech.com/corporate/environmental-sustainability-policy Energy Policy: https://www.hcltech.com/corporate/energy-policy Occupational Health & Safety Policy: https://www.hcltech.com/corporate/occupational-health-safety-policy Procurement Policy: https://www.hcltech.com/corporate/procurement-policy Supplier Code of Conduct: https://www.hcltech.com/corporate/supplier-code-conduct Water Policy https://www.hcltech.com/corporate/water-policy **Principle 7:** Code of Business Ethics and Conduct: https://www.hcltech.com/investor-relations/governance-policies/cobec Anti-Bribery & Anti-Corruption policy: https://www.hcltech.com/corporate/anti-bribery-and-anti-corruption-policy-abac **Principle 8:** CSR Policy: https://www.hcltech.com/corporate/corporate-social-responsibility-policy Supplier Code of Conduct: https://www.hcltech.com/corporate/supplier-code-conduct **Principle 9:** Code of Business Ethics and Conduct: https://www.hcltech.com/investors/governance-policies/cobecpdf Anti-Bribery & Anti-Corruption policy: https://www.hcltech.com/investors/governance-policies/abacpdf Privacy Statement: https://www.hcltech.com/privacy-statement Privacy Trust Center: https://www.hcltech.com/privacy-trust-center https://www.hcltech.com/hcl-vendor-privacy-and-information-security-requirements								
2. Whether the entity has translated the policy into procedures. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
	Policy and management process								
4. Name of the national and international codes/certifications/ labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle	**Principle 1:** ISO 37001:2016 – ABMS World's Most Ethical Companies by Ethisphere **Principle 2:** ISO 14001:2015 ISO 50001:2018 ISO 9001:2015 **Principle 3:** ISO 37001:2016 – ABMS ISO 45001:2018 ISO 14001:2015 ISO 14064-1:2018 and 14064-3:2019 ISO 50001:2018 ISO 9001:2015 LEED Certification **Principle 4:** ISO 9001:2015 **Principle 5:** Signatory to UNGC Founding Member-WEF's Global Parity Alliance on DE&I Certified as a Global Top Employer **Principle 6:** ISO 45001:2018 ISO 14001:2015 ISO 50001:2018 ISO 9001:2015 LEED Certification ISO 14064-1:2018 and 14064-3:2019 TRUE Zero Waste Certification in all HCLTech owned campuses in India **Principle 7:** Signatory to UNGC ISO 37001:2016 – ABMS **Principle 8:** Signatory to UNGC **Principle 9:** ISO 27001:2013								

Disclosure Quesstions	P1	P2	P3	P4	P5	P6	P7	P8	P9
	Policy and management process								

5.	Specific commitments, goals, and targets set by the entity with defined timelines, if any.	HCLTech has established ESG goals across three pillars: Planet, People, and Governance. **Planet:** ● Achieve net zero by 2040 ● Reduce absolute Scope 1 and 2 emissions by 50% by 2030 from the baseline year FY 2019–20 ● Transition of 80% of electricity usage to renewable energy by 2030 ● Reduce absolute Scope 3 emissions by 42% by 2030 from the baseline year FY 2019–20 ● Achieve zero waste to landfill at all owned facilities by 2025 **People:** ● Improve the sustainability knowledge and skills of our employees ● Improve gender diversity in the personnel with 40% Women by 2030 ● Increase gender representation in senior leadership levels to 30% by 2030 ● Be recognized among the best employers in our key operating geographies **Governance:** ● Strengthening sustainable supply chain process ● Integrate ESG with risk management and internal audit processes. ● Establish ourselves as a recognized leader in information security practices and data privacy standards. ***Note:** All D&I goals and practices are customized to comply with local laws.*
6.	Performance of the entity against specific commitments, goals, and targets along-with reasons in case the same are not met.	HCLTech has made significant progress toward its ESG targets, with notable achievements including: ● Increase in renewable energy use to 34.38% of total energy use ● 29% reduction in total energy consumption compared to base year FY 2019–20 ● 46% reduction in scope 1 and 2 emissions compared to base year FY 2019–20 ● 22% reduction in scope 3 emissions compared to base year FY 2019–20 ● All HCLTech owned campuses in India received TRUE Zero Waste Platinum Certification ● Women representation across all levels at 28.8% ● Recognized as one of the 2025 World's Most Ethical Companies® by Ethisphere, two years in a row ● Newly onboarded eligible suppliers screened based on ESG criteria under Vendor Onboarding Assessment (VOA) ● Capacity building of Suppliers by developing a learning platform on ESG ● HCLTech positioned as a Leader in Everest Group's Sustainable IT Services PEAK Matrix® Assessment 2025 ● HCLTech positioned as a Leader in Everest Group's Sustainable Engineering Services PEAK Matrix® Assessment 2025 ● HCLTech won the SAP Pinnacle Award in the Social Impact category for HCLTech's AquaSphere solution that helps enterprises achieve their water conservation goals ● HCLTech was included in S&P Global Sustainability Yearbook for the third year in a row **HCLTech positioned as a Leader in ISG Provider Lens™:** ● *Sustainability and ESG – Data Platforms and Managed Services, IT Solutions and Services, OT and Industry-specific Solutions and Services, Strategy and Enablement Services – U.S. 2024* ● *Sustainability and ESG – Data Platforms and Managed Services, IT Solutions and Services, OT and Industry-specific Solutions and Services, Strategy and Enablement Services – Australia 2024* ● *Sustainability and ESG – Data Platforms and Managed Services, IT Solutions and Services, OT and Industry-specific Solutions and Services, Strategy and Enablement Services – Europe 2024*

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
	Governance, leadership and oversight								

HCLTech is proud to share its fourth Business Responsibility and Sustainability Report (BRSR) for the financial year April 1, 2024, to March 31, 2025. To ensure accuracy, we have appointed DNV Business Assurance India Private Limited to review the BRSR core indicators and provide limited assurance on other details. Their assurance statement is included in the annual report.

HCLTech is embedding sustainability into its business and Client operations, driving transformation towards more sustainable practices and creating a positive impact on the planet.

This year, HCLTech is conducting a double materiality assessment with an objective to identify its key Environment, Social and Governance (ESG) issues relevant to business operations at the enterprise level.

Also, this year HCLTech has expanded the geographical coverage of its Climate Risk Assessment beyond India and USA to additionally cover Europe, Sri Lanka, and Australia demonstrating our commitment to sustainability.

Business Responsibility and Sustainability Reporting (BRSR) remains one of the key aspects of stakeholder engagement through which HCLTech demonstrates its progress in sustainability.

The company's advancements in sustainability have been recognized by various rating agencies, including:

- S&P
- MSCI
- EcoVadis
- Sustainalytics

HCLTech is an honoree of Ethisphere's 2025 World's most Ethical companies for the second year in a row.

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 policies.	The highest executive authority responsible for the implementation and oversight of the Business Responsibility 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.	Yes, the Company has an ESG & DEI Committee on the Board. The members of the ESG & DEI Committee are: • **Mr. Simon John England (DIN 08664595)** Independent Director Chairperson of the Committee • **Ms. Roshni Nadar Malhotra (DIN 02346621)** Non-Independent Director Chairperson of HCL Technologies Limited • **Ms Bhavani Balasubramanian (DIN 09194973)** Independent Director • **Mr. C. Vijayakumar (DIN 09244485)** CEO & Managing Director, is an invitee to this Committee.

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

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

11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide the name of the agency.	P1	P2	P3	P4	P5	P6	P7	P8	P9

Yes

- Reasonable Assurance of BRSR (core indicators) and Limited Assurance of BRSR (non-core and Sustainability Report: DNV)
- External ISO 37001-2016 certification annual audit by BSI
- Gap Assessment SA 8000: Bureau Veritas
- Global Top Employer Assessment: Top Employers Institute
- External ISO 14001 annual audit by BSI Management Systems
- External ISO 45001 annual audit by BSI Management Systems
- External ISO 22301 annual audit by Bureau Veritas
- External SOC 2 attestation by Grant Thornton
- Cyber Essential Plus by Sophlee Limited
- Impact assessment of CSR projects: Independent third parties
- All HCLTech campuses LEED "Platinum" certified by USGBC or IGBC

In addition, our policies undergo regular evaluation. For instance, HCLTech's Business Gift and Entertainment Policy ("BGEP") and Anti-Money Laundering Policy ("AML") were reviewed by DLA Piper to be in line with current industry standards.

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

Not Applicable

Section C : Principle Wise Performance Disclosures

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

Essential Indicators

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

Segment	Total number of training and awareness programmes held	Topics/principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	1	• The Current State of Business Ethics • The Changing Stakeholder Landscape and Corresponding Pressures and Expectations • The Impact of an Ethical Culture on Current and Future Employees • How the Best Companies are Responding to these Pressures	100%
Key Managerial Personnel	1	• Inspiring Ethical Employee Behavior • Making Ethical Decisions • Cash, Gifts and Entertainment Risks • Building a Speak-Up Culture • Responding to Employee Concerns • Nurturing Respect and D&I • Managing Employees Remotely • Speaking Up	100%
Employees other than BoD and KMPs	5	• Information Security • COBEC • Export Compliance • Dimensions of Data Privacy • Prevention of Workplace Harassment/ E-Secure Module	98.77%
Workers		Not Applicable	

Note:

- *The entire personnel of HCLTech are categorized as "Employees" and not as "Workers". Therefore, the information required in all sections in the "workers" category is not applicable to HCLTech.*
- *Inorganic headcount was not considered in the reporting boundary for the above disclosure for "Employees other than BoD and KMPs".*
- *The above trainings are mandatory for all employees upon joining and must be completed on an annual basis. As the data is specific to the financial year 2024-25, the percentages provided do not account for employees whose training completion is due after March 31, 2025.*

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

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

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

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

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

Yes, HCLTech has a Code of Business Ethics and Conduct ("COBEC"), Anti Bribery & Anti-corruption policy ("ABAC") in place. The policies apply to all individuals working worldwide for all affiliates and subsidiaries of HCLTech at all levels and grades. The policies cover giving and offering of bribes, and bribing of government officials, facilitation payments, charitable donations, political activities. Foreign corruption Practices Act ("FCPA"), the UK Bribery Act ("UKBA"), and the Indian Prevention of corruption Act are the governing legislations for these policies.

The Anti-Bribery & Anti-corruption ("ABAC") policy can be accessed on the company's website through this http://www.hcltech.com/corporate/anti-bribery-and-anti-corruption-policy-abac.

HCLTech has also obtained ISO 37001-2016 certification. The certificate may be accessed through the link: https://hcltech.com/corporate-certifications.

The company also conducts ABMS Quarterly Compliance Certification ("ABMS QCC") allowing for the disclosure of different tasks that occurred during the previous quarter. Furthermore, the company also offers a channel, Global Ethics Helpline; and whistleblower@hcltech.com for employees based in Germany and the Netherlands to raise and report their concerns, while ensuring confidentiality. The company is subject to annual internal and external audits carried out by other organizations for anti-bribery and anti-corruption.

HCLTech is honored to be recognized as one of Ethisphere's 2025 World's Most Ethical Companies ("WMEC") for the second consecutive year.

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

	FY 2024-25	FY 2023-24
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Not Applicable	Not Applicable

Note: *The entire personnel of HCLTech are categorized as "Employees" and not as "Workers". Therefore, the information required in all sections in the "workers" category is not applicable to HCLTech.*

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

Particulars	FY 2024-25		FY 2023-24	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	NA	Nil	NA
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	NA	Nil	NA

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

Not Applicable. There were no issues related to fines/penalties/actions taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflict of Interest at HCLTech.

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

Particular	FY 2024-25	FY 2023-24
Number of days of accounts payables	44.40	40.40

Note: *No. of days of accounts payable are computed excluding provisions*

9. **Open-ness of business**

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

Parameter		Metrics	FY 2024-25	FY 2023-24
Concentration of Purchases	a.	Purchases from trading houses as % of total purchases	Not Applicable	Not Applicable
	b.	Number of trading houses where purchases are made from	Not Applicable	Not Applicable
	c.	Purchases from top 10 trading houses as % of total purchases from trading houses	Not Applicable	Not Applicable
Concentration of Sales	a.	Sales to dealers/distributors as % of total sales	4.59%	4.03%
	b.	Number of dealers/distributors to whom sales are made	1,612	1,635
	c.	Sales to top 10 dealers/distributors as % of total sales to dealers/distributors	32.81%	28.27%
Share of RPTs in	a.	Purchases (Purchases with related parties/Total Purchases)	0.16%	0.14%
	b.	Sales (Sales to related parties/Total Sales)	0.03%	0.02%
	c.	Loans & advances (Loans & advances given to related parties/Total loans & advances)	0.00%	0.00%
	d.	Investments (Investments in related parties/Total Investments made)	0.00%	0.00%

Leadership Indicators

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

Total number of awareness programs held	Topics/ principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programs
1,454	The following topics were addressed in various programs: • Risk assessment & work permit system awareness, • Awareness on electrical safety, • LOTO (Lockout-Tagout) system, • Energy consumption & conservation, • Chemical safety & MSDS awareness, • Fire safety, emergency preparedness & evacuation procedure awareness, • Awareness on incident reporting & management, • Awareness on QHSEE Policy- objectives & targets, • Awareness on Legal compliances, • Awareness on power tools safety, PPE & its Importance, • Waste management, working at height, slip-trip- fall & ergonomics awareness • Confined space & lone working awareness, safe driving/road safety, • Energy conservation, environmental impacts • ESG manual that outlines its sustainability objectives and guidelines. • Internal auditor training on ISO 9001, ISO 14001 and ISO 45001 • Internal auditor training on ISO 50001 • GRI awareness training • Waste segregation and disposal training • Incident management training • Near miss reporting • Awareness on safe work at height and in confined spaces • HSE monitoring and measurement training	100%

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

Yes. The Company receives from the members of the Board, a list of entities in which they are interested, at the beginning of every financial year and as and when there is any change in such interest. It is ensured that the requisite approvals 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 avoid any activity or association that creates or appears to create a conflict between the personal interests of the Directors and the business interests of the Company.

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

Essential Indicators

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

Particulars	FY 2024-25 (₹ Crores)	FY 2023-24 (₹ Crores)	Details of improvements in environmental and social impacts
R&D	(1,658) 100%	(1,651) 100%	Investments in research and development (R&D) are made to enhance the effectiveness of our existing products and services, as well as to create new ones. Upgrading legacy code improves performance efficiency and leads to environmental benefits. Moreover, we focus on enhancing our products to provide better security and privacy for our users.
Capex	(1,108) 100%	(1.048) 100%	Our capital expenditure primarily focuses on infrastructure, enhancing our energy efficiency and accessibility through improved equipment and buildings.

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

We have implemented procedures for sustainable sourcing. Our Procurement team undergoes extensive training on ESG frameworks, ISO certifications, and sustainable supply chain initiatives.

All suppliers are expected to adhere to our Procurement Policy and Supplier Code of Conduct. ESG considerations are integrated from the outset during supplier selection processes, including through Requests for Proposals (RFPs) and e-bidding. Additionally, we employ a risk-based assessment approach when onboarding new vendors, evaluating various aspects of their operations to ensure compliance with our ESG criteria and adherence to our standards for sustainability and ethical practices. Our Procurement policy is also in accordance with ISO 20400 guidelines. Furthermore, we are currently undertaking a third-party evaluation of our procurement processes to ensure strict conformity to the guidelines established by ISO 20400.

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

100% of our suppliers are covered under responsible sourcing considering all suppliers are expected to abide by our Supplier Code of Conduct and Procurement Policy that outlines our expectations regarding ethical behavior, labor practices, environmental responsibility, and governance standards. This code serves as a foundation for ongoing engagement and performance monitoring.

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 to HCLTech as the Company does not engage in any product manufacturing activities.

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

Not applicable to HCLTech as the company does not engage in any product manufacturing activities.

Leadership Indicators

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

No

As an IT services company, our scope is primarily limited to services. Hence, the applicability of life cycle assessment to our operations is limited. There is applicability in the procurement of products and services for our own operations,

wherein we ensure that we prioritize the purchase of end-user devices with the least carbon footprint and consider other green procurement best practices. Our employees are trained in sustainability and are equipped to embed safety, privacy and environmental responsibility into the solutions we deliver. We conduct LCA for our services to our clients on a need basis. We have plans to upscale the LCA capabilities in our operations.

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

   Not Applicable. There are no such significant social or environmental concerns or risks identified. However, as our emissions are highest during the use phase of our tools/services, we reduce these emissions by increasing the share of renewable energy for our operations and making our operations even more energy efficient. We follow efficient coding practices that reduce iterations during the use phase, reducing energy consumption.

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 tons) reused, recycled, and safely disposed, as per the following format.**

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

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

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

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

Essential Indicators

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

Category		% of employees covered by									
	Total (A)	Health insurance		Accident insurance		Maternity Benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
		Permanent employees									
Male	158,943	158,943	100%	158,943	100%	NA	NA	158,943	100%	158,943	100%
Female	64,364	64,364	100%	64,364	100%	64,364	100%	NA	NA	64,364	100%
Others	113	113	100%	113	100%	NA	NA	NA	NA	113	100%
Total	**223,420**	**223,420**	**100%**	**223,420**	**100%**	**64,364**	**100%**	**158,943**	**100%**	**223,420**	**100%**

Note:

- *Health insurance includes ESIC coverage.*
- *"Other than Permanent" headcount was not considered in the reporting boundary for the above disclosure.*
- *The Group term life insurance policy is applicable to all employees of HCLTech. The policy offers extensive group life insurance for employees, offering support to their families in case of death from natural causes or accidents.*
- *Disclosing gender is voluntary for HCLTech employees. The employees who have not disclosed their gender are categorized as 'others'.*

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

   Not Applicable

   Note: The entire personnel of HCLTech are categorized as "Employees" and not as "Workers". Therefore, the information required in all sections in the "workers" category is not applicable to HCLTech.

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

	FY 2024–25	FY 2023–24
Cost incurred on well-being measures as a % of total revenue of the company	2.21%	1.93%

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

- Cost for maternity and paternity benefits (For FY 2024-25, following SEBI's guidance, the costs for maternity and paternity benefits have been included in the employee wellbeing expenditure. This change has contributed to an increase in the metric of employee well-being expenditure % in the current reporting year.)

- Cumulative percentage of country-specific expenditures associated with employee insurance, including life, health and other insurance

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

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

Benefits	FY 2024-25			FY 2023-24		
	No. of employees covered as a % of total employees	No. of employees 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 employees covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	100.00%	NA	Y	100.00%	NA	Y
Gratuity	100.00%	NA	Y	100.00%	NA	Y
ESI	7.78%	NA	Y	9.06%	NA	Y
Others – Please Specify	-	-	-	-	-	-

Note:

- India employee headcount has been considered for the details of retirement benefits.

- The entire personnel of HCLTech are categorized as "Employees" and not as "Workers". Therefore, the information required in all sections in the "workers" category is not applicable to HCLTech.

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.

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

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

   Yes. Our Human Rights policy (https://www.hcltech.com/corporate/human-rights-policy) includes our commitment of being an equal opportunity employer. Moreover, COBEC (https://www.hcltech.com/investor-relations/governance-policies/cobec) encompasses all areas on ethics, including a clause on equal opportunity.

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

	Permanent Employees		Permanent Workers	
	Return to work rate in %	Retention rate in %	Return to work rate in %	Retention rate in %
Male	99.95%	77.88%		
Female	99.56%	70.53%	Not Applicable	
Total	**99.81%**	**75.19%**		

Note: *The entire personnel of HCLTech are categorized as "Employees" and not as "Workers". Therefore, the information required in all sections in the "workers" category is not applicable to HCLTech.*

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

Particulars	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	Not Applicable
Other than Permanent Workers	Not Applicable
Permanent Employees	Yes. HCL has a multi-tiered grievance handling mechanism applicable to all permanent and non-permanent employees including, dedicated channels for addressing harassment, whistle-blower complaints, security incidents, discrimination, general grievances, etc. Employees can raise concerns by submitting their grievance to the Global Ethics Helpline (MyHCLTech >>Top Ribbon (Main Menu)>> Ethics Helpline).
Other than Permanent Employees	

Note: *The entire personnel of HCLTech are categorized as 'Employees' and not as 'Workers'. Therefore, the information required in all sections in the 'Workers' category is not applicable to HCLTech.*

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

Category	FY 2024-25			FY 2023-24		
	Total employees/ workers in respective category (A)	No. of employees/ workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees/ workers in respective category (C)	No. of employees/ workers in respective category, who are part of association(s) or Union (D)	% (D/C)
Total Permanent Employees	**223,420**	**11,673**	**5.22%**	**227,481**	**9,124**	**4.01%**
Male	158,943	8,422	5.30%	160,982	6,440	4.00%
Female	64,364	3,251	5.05%	66,268	2,684	4.05%
Others	113	–	–	231	–	–
Total Permanent Workers						
Male			Not Applicable			
Female						

Note:

- *The entire personnel of HCLTech are categorized as 'Employees' and not as 'Workers'. Therefore, the information required in all sections in the 'Workers' category is not applicable to HCLTech.*
- *Disclosing gender is voluntary for HCLTech employees. The employees who have not disclosed their gender are categorized as 'others'.*
- *There are 16 countries where we have recognized Workers Councils or Unions.*
- *"Other than Permanent" headcount was not considered in the reporting boundary for the above disclosure.*

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

Category	FY 2024–25					FY 2023–24				
	Total (A)	On Health and Safety Measures		On Skill Upgradation		Total (D)	On Health and Safety Measures		On Skill Upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	158,943	30,416	19.14%	154,963	97.50%	160,982	28,226	17.53%	148,524	92.26%
Female	64,364	12,320	19.14%	62,289	96.78%	66,268	10,205	15.40%	62,610	94.48%
Others	113	43	38.05%	64	56.64%	231	49	21.21%	78	33.77%
Total	**223,420**	**42,779**	**19.15%**	**217,316**	**97.27%**	**227,481**	**38,480**	**16.92%**	**211,212**	**92.85%**
Workers										
Male										
Female				Not Applicable						
Total										

Note:

- *Considered training for FTE employees active as on 31st March 2025 and 31st March 2024 respectively.*
- *The entire personnel of HCLTech are categorized as 'Employees' and not as 'Workers'. Therefore, the information required in all sections in the 'Workers' category is not applicable to HCLTech.*
- *Disclosing gender is voluntary for HCLTech employees. The employees who have not disclosed their gender are categorized as 'others'.*
- *"Other than Permanent" headcount was not considered in the reporting boundary for the above disclosure.*

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

Category	FY 2024–25			FY 2023–24		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	152,829	152,829	100%	152,116	152,116	100%
Female	61,807	61,807	100%	62,381	62,381	100%
Others	62	62	100%	63	63	100%
Total	**214,698**	**214,698**	**100%**	**214,560**	**214,560**	**100%**
Workers						
Male						
Female			Not Applicable			
Total						

Note:

- *Eligible employees are considered in Total Employees.*
- *The entire personnel of HCLTech are categorized as 'Employees' and not as 'Workers'. Therefore, the information required in all sections in the 'Workers' category is not applicable to HCLTech.*
- *Disclosing gender is voluntary for HCLTech employees. The employees who have not disclosed their gender are categorized as 'others'.*

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

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

    Yes, while 100% of HCLTech Employees are covered under OH&S Policies and procedures, facilities covering 70% of HCLTech employees are certified against ISO 45001:2018. ISO 45001:2018 is a global standard for Occupational Health and Safety Management Systems (OHMS). It improves workplace safety, reduces risks, and supports employee well-being by helping organizations identify hazards, comply with safety regulations, and enhance the work environment.

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

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

After risks are identified, the following steps are taken:

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

The above steps ensure a continuous cycle of improvement to minimize risks and enhance system reliability.

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

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

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

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

Yes.

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

Safety Incident/Number	Category	FY 2024-25	FY 2023-24
Lost Time Injury Frequency Rate (LTIFR) (per one million person hours worked)	Employees	0.0088843	0.008639
	Workers	Not Applicable	
Total recordable work-related injuries	Employees	29	27
	Workers	Not Applicable	
No. of fatalities	Employees	0	0
	Workers	Not Applicable	
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	Not Applicable	

Note: The entire personnel of HCLTech are categorized as 'Employees' and not as 'Workers'. Therefore, the information required in all sections in the 'Workers' category is not applicable to HCLTech.

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

HCLTech is dedicated to ensuring a safe and healthy workplace. Here's what we are doing to achieve that:

- Ensure we follow all the necessary health and safety laws and support our team members to do the same
- Provide regular training sessions on Occupational Health & Safety so everyone knows what to do
- Conduct regular inspections and audits to stay on top of our safety standards and ensure we meet our internal goals
- Provide our employees with Personal Protective Equipment to keep them safe
- Undertook evaluation for our campuses under the International Safety Awards hosted by the British Safety Council (BSC). In total, our five sites are certified by the BSC. The Sites included are: Noida, Chennai, Lucknow, Vijayawada and Madurai
- HCLTech sites certified under the Occupational Health & Safety (OHS) management system aligned with ISO 45001:2018
- Major campuses participated in the Golden Peacock Award hosted by the Institute of Directors (IOD)
- 23 facilities across India and the Geos certified under ISO 45001:2018, covering 70% of our existing sites. Certification for new sites is in progress, with ongoing audits. Upon completion of these audits, the certification percentage will increase to 73%

HCLTech has established mechanisms in place to protect employees' safety, and employees are encouraged to share any workplace risks or health concerns. HCLTech has safety committees that convene at regular intervals. There is a safety incident reporting and management mechanism in place to guarantee that all work-related occurrences are reported and resolved through appropriate corrective actions.

In addition to these efforts, HCL Healthcare focuses on offering managed healthcare services to employees and their families in India. These services include lab services, virtual specialist doctor consultations, eye care solutions, and dentistry services. The clinics are built to international standards and are dedicated to offering a wide variety of health care services to employees and their families.

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

Type	FY 2024–25			FY 2023–24		
	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	10	0	-	9	0	-
Health & Safety	4,027	0	-	9	2	-

Note:

- *In FY 2024–25, the IFMS tool was used to formally raise, track, and close complaints, allowing for efficient digital management of employee complaints. Efforts were also made to increase awareness and encourage employees to submit complaints. As a result, the number of complaints is higher compared to the previous year.*
- *The entire personnel of HCLTech are categorized as 'Employees' and not as 'Workers'. Therefore, the information required in all sections in the 'Workers' category is not applicable to HCLTech.*

14. **Assessments for the year:**

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

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

Risk assessment is conducted at regular intervals, annually, and as needed, following the 'FMEA' or 'Failure Mode and Effect Analysis' methodology for Occupational Health and Safety (OHS) risks at the site. Necessary control measures are introduced for all identified risks.

Sr. No.	Risk & Concerns	Corrective action
1	Access related issues associated with PWD	A PWD gap assessment was conducted using 'Harmonised guidelines and standards for universal accessibility in India' by an independent third party for seven campuses in India. Corrective actions based on this assessment have commenced. All critical entry and exit points have been modernized to facilitate smooth access for People with Disabilities (PWD).
2	Lack of awareness on the environmental aspects	To improve awareness of environmental aspects, enhanced communication strategies and methodologies were planned. Both digital and traditional modes of communication were utilized to achieve this objective. Below are some examples of these initiatives. Additionally, motivational and employee engagement aspects were explored as outlined below. Awareness initiatives included speeches by leadership, oath-taking ceremonies, drawing and quiz competitions, and best-out-of-waste competitions.
3	Non-availability of policies in the local language	Enhanced communication methods were planned to raise awareness of environmental issues. Both digital and traditional modes were used. Examples include: • Audio files of policies translated into local languages. • QR-based audio QHSEE (Quality, Health, Safety, Environment, and Energy) policies displayed in areas accessible to employees, especially facility management staff, transport team, and security guards.
4	Leadership drive on HSE awareness	The leadership team's involvement in raising Health, Safety, and Environment (HSE) awareness was another significant initiative aimed at enhancing HSE knowledge among staff. On National Safety Day/Week, a leadership video message was broadcast to promote HSE awareness. In celebration of the 54th National Safety Day/Week campaign in 2025, the Leadership Team shared a special video message emphasizing our collective commitment to safety. This communication was disseminated across operations, facility management teams, and other vendor partners, including their employees.
5	Risks associated with Electrocution	To mitigate identified risks associated with electrocution on-site, changes in procurement strategies and policies were implemented. More durable materials and items were procured to proactively address safety concerns

Leadership Indicators

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

   Yes. All the employees of the company are covered by Group Term Life Insurance. This policy offers extensive group life insurance for employees, offering support to their families in case of death from natural causes or accidents.

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

   Our Vendor Onboarding Assessment program serves as a control mechanism to identify regulatory noncompliance issues while onboarding new vendors. We also conduct periodic assessments of vendors which include a comprehensive review of statutory compliances.

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

Category	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2024-25	FY 2023-24	FY 2024-25	FY 2023-24
Employees	0	0	0	0
Workers	Not Applicable	Not Applicable	Not Applicable	Not Applicable

Note: The entire personnel of HCLTech are categorized as 'Employees' and not as 'Workers'. Therefore, the information required in all sections in the 'Workers' category is not applicable to HCLTech.

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

   Yes

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

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

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

   HCLTech has taken several proactive steps to address risks identified through detailed reviews of health and safety practices, as well as working conditions across its value chain. Some of the key actions include:

   - Repairing occupancy sensors in Phase-3 areas at the Noida facility to ensure safe and efficient operations.
   - Installing partitions in server and mix rooms to improve energy efficiency and maintain optimal working conditions.
   - Fitting restrooms with motion sensors to enhance hygiene and conserve energy.
   - Applying a high SRI (Solar Reflectance Index) cool roof coating on terrace areas to reduce heat absorption and improve thermal comfort.
   - Translating the QHSEE (Quality, Health, Safety, Environment, and Energy) policy into regional languages, making it easier for on-ground teams to understand and follow.
   - Conducting hands-on first aid training for staff engaged through Integrated Facilities Management Services (IFMS), strengthening emergency response readiness.

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

Essential Indicators

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

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

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

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

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

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

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

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/Half yearly/Quarterly/others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Investors/Shareholders	No	• Online surveys • Focus group discussions • One-on-one interviews • Non-deal roadshows • Investor events (one-on-one and in groups) and reverse roadshows. • Geo-based management-level meetings post quarterly results. • Webinars (one-on-one and in groups).	Quarterly	**Purpose:** To maximize shareholder value, attract investment, and provide transparent information. **Scope:** Regular financial reporting, investor conferences, analyst interactions, and timely updates on business performance, strategy, and corporate governance. **Aspects discussed:** Emerging business risks and opportunities related to sustainability/ESG issues affecting reputation and business performance, 3-to-5-year ESG Roadmap, delivery model, hybrid work environment, supply-side pressures like attrition rate and hiring rate, and sustainability of demand.

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

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/Half yearly/Quarterly/others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Clients	No	• Client experiences Surveys at Project Level (PCSAT) • Client experiences Surveys at relationship level (ACSAT) • Quarterly Business reviews (QBR) • Monthly Service Reviews (MSR) • Customer Advisory Board (CAB)	PCSAT – Half yearly ACSAT – Annually QBR – Quarterly MSR – Monthly CAB – Annually	**Purpose:** To deliver exceptional client experiences, build long-term relationships and meet client expectations. **Scope:** • Quality products and services, personalized solutions, prompt client support, feedback mechanisms, client satisfaction surveys and continuous improvement based on client insights • Resolution of any delivery challenges • Feedback on technology and services being implemented • Discovery of adjacent net new opportunities • Grow footprint and upsell • Account-based marketing (ABM) plans • Quarterly Business Reviews (QBR) process **Aspects discussed:** • Contract compliance. • Resource management. • Payment queries. • Delivery challenges or delays
Communities in which we operate	Yes	• Survey • Focus Group Discussions • Capacity Building • Regular Interactions & Discussions	Monthly	**Purpose:** To actively support local development in the identified slums/intervention sites, enhance social wellbeing and promote sustainable practices within communities through CSR Initiatives. **Scope:** Community development initiatives, early childhood care and development, education and skill-building programs, healthcare support, water sanitation and hygiene (WASH), Sports for development initiatives, volunteering activities as well as disaster risk reduction and response efforts. Assessment undertaken for Corporate Social Responsibility (CSR) projects and grievance redressal. **Aspects discussed:** Education, water, sanitation and hygiene (WASH), malnutrition, environmental sustainability, skill development and employability

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

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

Leadership Indicators

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

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

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

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

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

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

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

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

   The Corporate Sustainability team closely tracks key ESG metrics and provides regular updates to both the ESG Committee and the CEO. This process ensures transparency and keeps leadership accountable for delivering on the company's ESG commitments.

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

Yes. HCLTech has consulted stakeholders for arriving at the 12 material topics and will continue to monitor the progress of the topics. Engaging with stakeholders is central to how the Company identifies environmental, social and governance topics. Through these interactions, we gather valuable feedback, insights, and data that help us focus on what matters most. This process plays a key role in shaping and refining our ESG strategy.

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

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

HCLFoundation, which delivers the CSR agenda of HCLTech, is deeply committed to uplifting vulnerable and marginalized communities. Its initiatives are thoughtfully designed to reach those who need support the most, ensuring no one is left behind.

Over the years, the Foundation's work has touched the lives of more than 7.5 million people, with women making up 54% of the community members/program participants. It has also extended meaningful support to over 15,000 persons with disabilities, helping them lead more empowered and dignified lives.

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

- Planting over 3.2 million saplings,
- Building 358 water structures,
- Reviving 265 water bodies

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

Principle – 5 Businesses should respect and promote human rights

Essential Indicators

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

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)
Employees						
Permanent	223,420	208,747	93.43%	227,481	217,733	95.71%
Other than Permanent	11,076	9,076	81.94%	9,767	8,599	88.04%
Total Employees	**234,496**	**217,823**	**92.89%**	**237,248**	**2,26,332**	**95.40%**
Workers						
Permanent						
Other than Permanent			Not Applicable			
Total Workers						

Note:

- *The entire personnel of HCLTech are categorized as 'Employees' and not as 'Workers'. Therefore, the information required in all sections in the 'Workers' category is not applicable to HCLTech.*
- *The above training is mandatory for all employees upon joining and must be completed on an annual basis. As the data is specific to the financial year 2024-25, the percentages provided do not account for employees whose training completion is due after March 31, 2025.*

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

Category	FY 2024-25					FY 2023-24				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Permanent Employees										
Male	158,943	-	-	158,943	100%	160,982	0	0	160,982	100%
Female	64,364	-	-	64,364	100%	66,268	0	0	66,268	100%
Others	113	-	-	113	100%	231	0	0	231	100%
Other than Permanent Employees										
Male	8,131	-	-	8,131	100%	7,437	0	0	7,437	100%
Female	2,853	-	-	2,853	100%	2,238	0	0	2,238	100%
Others	92	-	-	92	100%	92	0	0	92	100%
Workers										
Permanent										
Male										
Female					Not Applicable					
Other than Permanent										
Male										
Female										

Note:

- *The entire personnel of HCLTech are categorized as 'Employees' and not as 'Workers'. Therefore, the information required in all sections in the 'Workers' category is not applicable to HCLTech.*
- *Disclosing gender is voluntary for HCLTech employees. The employees who have not disclosed their gender are categorized as 'others'.*

3. Details of remuneration/salary/wages

    a. Median remuneration/wages:

Category	Male		Female		Others	
	Number	Median remuneration/ salary/ wages of respective category (₹ Lakhs per annum)	Number	Median remuneration/ salary/ wages of respective category (₹ Lakhs per annum)	Number	Median remuneration/ salary/ wages of respective category (₹ Lakhs per annum)
Board of Directors (BoD)	4	109	4	96	-	-
Key Managerial Personnel (KMP)	2	4,608	-	-	-	-
Employees other than BoD and KMP	167,071	18.18	67,217	9.53	205	81.10
Workers			Not Applicable			

Note:

- *USD Exchange rate considered – INR 82 = 1 USD*
- *Remuneration of the CEO and Managing Director has been included in KMP information.*
- *Information regarding the Directors and KMPs who have either joined or resigned during the financial year is incomparable and has not been considered.*
- *KMPs include the CEO and Managing Director, Chief Financial Officer and Company Secretary. However, the above information excludes the information related to the CFO as they received remuneration for part of the financial year.*

- The remuneration/ salary/ wages for the unknown category is high as majority of these employees are based in Geographies/locations outside India.
- The entire personnel of HCLTech are categorized as 'Employees' and not as 'Workers'. Therefore, the information required in all sections in the 'Workers' category is not applicable to HCLTech.

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

	FY 2024–25	FY 2023–24
Gross wages paid to females as % of total wages	20.49%	20.41%

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

Yes.

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

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

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

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

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

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

Particulars	FY 2024–25			FY 2023–24		
	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	5	Please refer the note below**	87	11	–
Discrimination at Workplace	0	NA	–	0	NA	–
Child Labor	0	NA	–	0	NA	–
Forced Labor/Involuntary Labor	0	NA	–	0	NA	–
Wages	0	NA	–	0	NA	–
Other human rights related issues	0	NA	–	0	NA	-

Note:

- Complaints disclosed are globally; and in question 7 it's India specific.
- Complaints disclosed as on March 31 of the respective financial year.

**The investigation has established regulations and a framework for completing the report. These will be followed in accordance with the prescribed guidelines, and the final report will be made available to the intended audience.*

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

Particulars	FY 2024–25	FY 2023–24
	Filed during the year	Filed during the year
Total complaints reported under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	44	75
Complaints on POSH as a % of female employees/workers	0.09%	0.14%
Complaints on POSH upheld	30	56

Note: POSH Act is India specific, hence disclosed numbers are for India – Operations.

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

Employees must report any incidents of alleged harassment that they are aware of through channels provided by the Global Ethics Helpline (GEH) which allows employees to make complaints about sexual harassment in the workplace online. Employees can also share their concerns and queries using secure@hcltech.com.

All official mechanisms for reporting issues/complaints are focused on preventing and addressing sexual harassment grievances in the workplace in accordance with HCL's Prevention and Redressal of Sexual Harassment at Workplace Policy. The policies and practices are in accordance with the applicable laws, especially the "The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013" for employees based in India, as well as other relevant rules in the countries where the company operates.

If an employee is subjected to sexual harassment, they should report it to secure@hcltech.com immediately. The Internal Complaints Committee ("ICC") investigates and addresses complaints received through this method with the utmost objectivity and confidentiality. HCL Tech also guarantees that the standard SLAs required by law are satisfied.

False Accusation: If the ICC determines that the complaint against the respondent is malicious, that the aggrieved woman or anyone else filing it knew it was false, or that the aggrieved woman or anyone else filing it has produced any forged or misleading document, it may advise the employer to take appropriate action, such as issuing a written apology, issuing a warning, reprimanding or censured the employee, withholding a promotion, withholding a pay increase, terminating their employment, having them undergo counseling, or having them perform community service. However, this excludes claims that are hard to support or that were made in good faith.

Right to Appeal: Any individual who is dissatisfied with the recommendations made may file an appeal with the court or tribunal within the time frame specified, in the manner required, without prejudice to any provisions contained in any other legislation now in effect.

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

Yes

10. **Assessments for the year:**

Particulars	% of your plants and offices that were assessed (by entity or statutory authorities or third parties
Child Labor	73%
Forced/Involuntary Labor	73%
Sexual Harassment	73%
Discrimination at workplace	73%
Wages	73%
Others – please specify	-

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

No significant risks/concerns were identified.

Leadership Indicators

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

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

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

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

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

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

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

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual harassment	
Discrimination at workplace	
Child labor	
Forced/involuntary labor	72%
Wages	
Others – please specify	

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

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

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

Essential Indicators

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

Parameter	FY 2024–25	FY 2023–24
From renewable sources (GJ)		
Total electricity consumption (A)	323,444.62	187,403.10
Total fuel consumption (B)	0.00	0.00
Energy consumption through other sources (C)	0.00	0.00
Total energy consumed from renewable sources (A+B+C)	**323,444.62**	**187,403.10**
From non–renewable sources (GJ)		
Total electricity consumption (D)	606,340.86	782,259.72
Total fuel consumption (E)	10,907.49	15,509.60
Energy consumption through other sources (F)	0.00	0.00
Total energy consumed from non–renewable sources (D+E+F)	**617,248.35**	**797,769.32**
Total energy consumed (A+B+C+D+E+F)	**940,692.98**	**985,172.42**
Energy intensity per rupee of turnover (Total energy consumed/ Revenue from operations) (GJ/Million ₹)	0.80	0.90
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed/Revenue from operations adjusted For PPP) (GJ/million USD)	16.42	18.19
Energy intensity in terms of physical output (GJ/FTE)	4.21	4.33

Note:

- *GJ is Gigajoule*
- *Revenue from operations has been adjusted for PPP using the World Bank's conversion factor for FY 2024–25. For FY 2023–24, it has been adjusted and restated using the World Bank's factor for FY 2023–24.*

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

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

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

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

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

Parameter	FY 2024–25	FY 2023–24
Water withdrawal by source (in kiloliters)		
(i) Surface water	0	0
(ii) Groundwater	261,965.02	196,684.43
(iii) Third-party water	332,476.36	301,249.04
(iv) Seawater/desalinated water	0	0
(v) Others (Rainwater, generated drinking water from Air, AHU Condensation and Municipality water)	255,486.96	250,365.57
Total volume of water withdrawal (in kiloliters) (i + ii + iii + iv + v)	**849,928.34**	**748,299.04**
Total volume of water consumption (in kiloliters)	**834,013.09**	**737,685**
Water intensity per rupee of turnover (Total water consumption/Revenue from operations (KL/Million ₹)	0.71	0.67
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption/Revenue from operations adjusted for PPP) (KL/million USD)	14.56	13.62
Water intensity in terms of physical output (KL/FTE)	3.73	3.24

Note:

- *Data disclosed for FY 2024–25 covers India and global locations. However, FY 2023–24 data covers only India locations.*
- *Revenue from operations has been adjusted for PPP using the World Bank's conversion factor for FY 2024–25. For FY 2023–24, it has been adjusted and restated using the World Bank's factor for FY 2023–24.*
- *Intensity is measured per million units.*

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

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

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

Parameter	FY 2024–25	FY 2023–24
Water discharge by destination and level of treatment (in kiloliters)		
i. To Surface Water	–	–
–No treatment	–	–
–With treatment – please specify the level of treatment	–	–
ii. To Groundwater	–	–
–No treatment	–	–
–With treatment – please specify the level of treatment	–	–
iii. To Seawater	–	–
–No treatment	–	–

Parameter	FY 2024-25	FY 2023-24
–With treatment – please specify the level of treatment	–	–
iv. Sent to third parties	–	–
–No treatment	15,915.25	10,614
–With treatment – please specify the level of treatment	–	–
v. Others	–	–
–No treatment	–	–
–With treatment – please specify the level of treatment		–
Total water discharged (in kiloliters)	**15,915.25**	**10,614**

Note: Data in the table above covers only India operations.

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

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

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

   HCLTech recycles about 97% of its sewage water at its own treatment plants, then reuses it around the company's campus. Only 3% is sent to the local municipal treatment facilities. HCLTech has set up two sewage treatment plants specifically to recycle this water, mainly to cut down on using fresh water. Recycled water is used for things like watering plants and flushing toilets and urinals, making the whole process sustainable and eco-friendly.

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

Parameter	Please specify unit	FY 2024- 25	FY 2023- 24
Nox	Tons	2.52	2.86
Sox	Tons	0.19	0.36
Particulate matter (PM)	Tons	0.38	0.51
Persistent organic pollutants (POP)	Tons	0	0
Volatile organic compounds (VOC)	Tons	0	0
Hazardous air pollutants (HAP)	Tons	0	0
Others-please specify	Tons	0	0

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

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

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

Parameter	Unit	FY 2024-25	FY 2023-24
Total Scope 1 emissions (Break-up of the GHG into CO_2, CH_4, N_2O, HFCs, PFCs, SF_6, NF_3, if available)	Metric tons of CO_2 equivalent	12,900.5	12,507.61
Total Scope 2 emissions (Break-up of the GHG into CO_2, CH_4, N_2O, HFCs, PFCs, SF_6, NF_3, if available)	Metric tons of CO_2 equivalent	109,074.02	154,918
Total Scope 1 and Scope 2 emission per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions/Revenue from operations)	Metric tons of CO_2 equivalent/million ₹	0.10	0.15
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions/Revenue from operations adjusted for PPP)	Metric tons of CO_2 equivalent/million USD	2.13	3.09
Total Scope 1 and Scope 2 emission intensity in terms of physical output	Metric tons of CO_2 equivalent/FTE	0.55	0.74

Note:

- *Revenue from operations has been adjusted for PPP using the World Bank's conversion factor for FY 2024-25. For FY 2023-24, it has been adjusted and restated using the World Bank's factor for FY 2023-24.*
- *Intensity is measured per million units.*

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

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

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

   Yes. List of initiatives is given below:

   - Conducted "Energy Audit" for our 7 major Campuses in India and implementing initiatives towards enhancing the efficiency of our facilities.
   - End of Life Replacement: End of Life Assessment conducted for critical systems across different regions and replaced several key pieces of equipment, including the Chiller, UPS system, and VRF (HVAC) system with new energy-efficient products.
   - Technology adoption: (a) Introduced the "Scale Bio Remover" (SBR) for cooling water treatment requirements. This state-of-the-art technology supersedes the traditional method of manually treating water with chemicals. By integrating SBR, we are eliminating manual dosing, resulting in enhancement in monitoring and control through automation. This novel approach not only streamlines our processes but also ensures a more efficient and effective treatment of cooling water. (b)Upgraded the Air Handling Unit by replacing the conventional belt drive blower with an advanced, energy-efficient electronically commutated fan. This modification has significantly enhanced the blower efficiency from 35% to 72%.

   Renewable Energy

   - In a key milestone towards strengthening its renewable energy portfolio, HCLTech is now procuring renewable power under Open Access – Group Captive model as well
   - Power Purchase Agreements (PPA) and Subscription Shareholding Agreements (SSHA) have been finalised for the Noida and Lucknow campuses, significantly increasing the share of renewable energy in the overall power mix.
   - These efforts mark a concrete step towards the company's global ambition of achieving 80% renewable electricity in its energy mix by 2030.
   - As a result of these developments, the renewable energy share has risen from 19% in FY 2023-24 to 34.38% by the end of FY 2024-25.

   Sustainable mobility

   1. In FY 2023-24, the company rolled out electric vehicles at its Hyderabad and Bengaluru (Bangalore) campuses as part of its broader sustainability agenda.
   2. The EV fleet is being operated under long-term contractual arrangements, replacing diesel-powered vehicles for employee transportation.
   3. As of December 2024, this transition has led to an estimated reduction of 405.18 tCO$_2$e in emissions, underlining the company's commitment to low-carbon mobility solutions.

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

Parameter	FY 2024- 25	FY 2023- 24
Total Waste generated (in metric tons)		
Plastic waste **(A)**	10.73	9.606
E-waste **(B)**	156.30	334.90
Bio-medical waste **(C)**	4.37	4.00
Construction and demolition waste **(D)**	39.25	64.00
Battery waste **(E)**	82.67	222.00
Radioactive waste **(F)**	0	0
Other Hazardous waste. Please specify, if any. **(G)** (Used or Spent Oil and Oil filters)	21.68	16.41
Other Non-hazardous waste generated **(H)**. *Please specify, if any*. (Break-up by composition i.e. by materials relevant to the sector) (Food waste and other general waste)	1,488.01	1,759
Total (A+B + C + D + E + F + G + H)	**1,803.01**	**2,409.92**

Parameter	FY 2024-25	FY 2023-24
Waste intensity per rupee of turnover (Total waste generated/Revenue from operations) per million ₹	0.0015	0.0022
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated/Revenue from operations adjusted for PPP) MT/million USD	0.03	0.04
Waste intensity in terms of physical output (MT/FTE)	0.0081	0.0106
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tons)		
Category of waste		
(i) Recycled	1,660.28	1,914.00
(ii) Re-used	–	–
(iii) Other recovery operations	–	–
Total	**1,660.28**	**1,914.00**
For each category of waste generated, total waste disposed by nature of disposal method (in metric tons)		
Category of waste		
(i) Incineration	9.17	9.00
(ii) Landfilling	–	–
(iii) Other disposal operations	–	–
Total	**9.17**	**9.00**

Note:

- *Revenue from operations has been adjusted for PPP using the World Bank's conversion factor for FY 2024-25. For FY 2023-24, it has been adjusted and restated using the World Bank's factor for FY 2023-24*
- *Data covers only India operations*

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

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

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

    HCLTech is dedicated to waste reduction and adheres to the principles of Reduce, Reuse, and Recycle. Notably, all HCLTech owned campuses in India have been awarded the TRUE Zero Waste Platinum Certification.

    The following steps/initiatives have been taken by HCLTech.

    - Waste plastic bottles & containers were converted into DIY planters by the ground staff.
    - Creation of the in-house bamboo pots for the old smoking zone, creation of the mobile selfie stand & placards done for the mock drills utilizing the old mop sticks & waste wooden planks
    - Installation of the stainless-steel jet hand driers & removal of the M-fold napkins.
    - Implementation of the customized trio bins at cafeteria with proper name labels for various types of dry waste.
    - Display of the customized waste segregation board at garbage yard to create awareness to the housekeeping staff & periodical trainings regarding the Waste Segregation. Installation of the OTTO trolley bins for waste collection and storage.
    - In-house fishpond utilizing the old & broken tiles from the water body & a few pebbles available on the Campus.
    - Implementation of the in-house rotating mobile sprinklers for the landscape area to provide coverage for all the areas

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

    No

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

    Not Applicable

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

Yes, HCLTech is compliant with all applicable laws.

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 courts	Corrective action taken, if any
		No non-compliance has been noted.		

Leadership Indicators

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

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

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

   (ii) **Nature of operations:** IT Services

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

Parameter	FY 2024-2025	FY 2023-2024
Water withdrawal by source (in kiloliters)		
(i) Surface water	0	–
(ii) Groundwater	258,963.42	–
(iii) Third-party water	332,277.49	–
(iv) Seawater/desalinated water	0	–
(v) Others	249,362.50	–
Total volume of water withdrawal (in kiloliters)	**840,603.41**	**–**
Total volume of water consumption (in kiloliters)	**824,688.16**	**–**
Water intensity per rupee of turnover (Water consumed/turnover)	0.70	–
Water discharge by destination and level of treatment (in kiloliters)		
(i) Into Surface water	–	–
– No treatment	–	–
– With treatment – please specify the level of treatment	–	–
(ii) Into Groundwater	–	–
– No treatment	–	–
– With treatment – please specify the level of treatment	–	–
(iii) Into Seawater	–	–
– No treatment	–	–
– With treatment – please specify the level of treatment	–	–
(iv) Sent to third parties	–	–
– No treatment	15,915.25	–
– With treatment – please specify the level of treatment	–	–
(v) Others	–	–
– No treatment	–	–
– With treatment – please specify the level of treatment	–	–
Total water discharged (in kiloliters)	15,915.25	–

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

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

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

Parameter	Unit	FY 2024–25	FY 2023–24
Total Scope 3 emissions (Break-up of the GHG into CO_2, CH_4, N_2O, HFCs, PFCs, SF_6, NF_3, if available)	Metric tons of CO_2 equivalent	269,567.38	247,460.00
Total Scope 3 emission per rupee of turnover (Total Scope 3 GHG emissions/Revenue from operations)	Metric tons of CO_2 equivalent/million ₹	0.23	0.23
Total Scope 3 emission intensity in terms of physical output	Metric tons of CO_2 equivalent/FTE	1.21	1.09

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

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

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

Not applicable

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

S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1.	Increased in Renewable Energy Consumption	As part of its long-term commitment to reducing its carbon footprint, the company has set a target to source 80% of its electricity from renewable sources—such as wind, solar, and hydro—by 2030. So far, 34.38% of the company's global electricity needs have been met through renewable energy, amounting to 89,845.78 MWh. Of this, 58,263.35 MWh was consumed by facilities in India—including 2,615.55 MWh generated from onsite solar installations—and 31,582.43 MWh was utilised across global (Geo) locations. This shift to cleaner energy has contributed to a total emissions reduction of 45,425.35 tCO_2e. Of this, 42,357.46 tCO_2e was reduced across Indian operations and 3,067.90 tCO_2e across Geo locations, underscoring the company's progress toward decarbonising its energy consumption globally.	This has enabled the Company to reduce carbon footprint by 45,425.35 tCO_2e (Tons of Carbon dioxide equivalent) out of which 42,357.46 tCO_2e in India and of 3,067.90 tCO_2e in Geo locations.
2.	High Side: HVAC System Efficiency Improvement	By upgrading the chiller systems to magnetic chillers, enhancing control measures, retrofitting the cooling towers, replacing fills, and increasing the cooling tower approach activities, the company managed to save around 385.90 MWh of energy. This also helped cut down greenhouse gas emissions by approximately 280.55 tons of CO_2 equivalent.	Saved 385.90 MWh of energy and has helped to reduce 280.55 tCO_2e of emissions.
3.	Low Side: HVAC System Efficiency Improvement	The Company has made some upgrades to the low side of our HVAC systems across major facilities to boost efficiency. This included installing energy-saving units, upgrading to energy-efficient VRF and DX systems, replacing old belt-driven motors on AHUs with more efficient EC fans, and optimizing HVAC through activities like consolidating UPS systems. These changes helped the company save about 1,542.84 MWh of energy and cut down emissions by approximately 1121.65 tons of CO_2 equivalent.	Saved 1,542.84 MWh of energy and has helped to reduce 1121.65 tCO_2e of emissions.
4.	Technology Adoption	We've upgraded the AHU's conventional motors with more efficient EC fans, improved overall performance by using HVLS fans, and connected the AHU fan motors to VFDs for better control. Besides, we've optimized the cooling tower operations with SBR, which collectively saved around 443.66 MWh of energy and reduced CO_2 emissions by about 322.54 tons of CO_2 equivalent.	443.66 MWh of absolute energy consumption and has helped to reduce 322.54 tCO_2e emissions.
5.	Effective Utilization of UPS	Based on how much power the UPS systems need, we've upgraded to more energy-efficient units and fine-tuned the backup capacity by shutting down certain systems when they're not needed. We've also added passive filters to help improve efficiency. These changes have led to saving about 1,268.48 MWh of energy and reducing CO_2 emissions by around 922.19 tons of CO_2 equivalent.	1,268.48 MWh and emission reduction of 922.19 tCO_2e.

S. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
6.	Energy Efficient Lighting Control	The company decided to ramp up its efforts to use more LED lighting across all its facilities—think workspaces, cafes, pantries, pathways, outdoor areas, and basements. We also added smart features like motion sensors and daylight harvesting to make sure the lights are only switched on when needed. These changes helped optimize lighting usage and cut down on energy waste. Overall, this saved about 123.53 MWh of energy, which also meant cutting down roughly 89.81 tons of CO_2 equivalent emissions.	123.53 MWh of absolute energy consumption reduction, thereby reducing 89.81 tCO_2e emissions.
7.	Water Conservation	The company upped its water-saving efforts by making smart tweaks to reduce water flow. We combined Scale Bio removal with de-ionization in the cooling tower and also automated the garden sprinklers. All these changes added up to saving around 2.051 million liters of water	Enabled company to save 2.051 million liters of water
8.	Transport Sustainability through Electric Vehicles	FY 2023-24 the successful launch of electric vehicles (EVs) in Hyderabad and Bangalore marked a significant step towards our sustainability goals. By implementing long-term contracts for EV operations, the company has achieved a total emission reduction of 823.66 tCO2e compared to diesel-operated vehicles for FY 2024-25. a) Hyderabad: Effective from August 1, 2023, we signed contracts with suppliers and began with 15Nos electric fleet vehicles. This number increased to 116Nos fleet vehicles, enabling us to perform 75% of daily trips using EVs by Mar'25. This initiative resulted in a reduction of 395.82 tCO2e emissions. b) Bangalore: Effective from January 20, 2024, we signed a contract with our first supplier and began with 15Nos electric fleet vehicles. This number gradually increased to 90+ EVs, covering 75% of daily sedan trips by Mar'25. This initiative resulted in a reduction at Bangalore – Jigani of 422.56 tCO_2e emissions. At Bangalore – ROB, EV operations started operating from 1st Dec'24 with 7 EV with existing supplier and reached 13 EV by Mar'25. This initiative resulted in a reduction at Bangalore – ROB of 5.29 tCO2e emissions. The overall reduction at Bangalore region of 427.84 tCO_2e emissions.	By implementing long-term contracts for EV operations, the company has achieved a total emission reduction of 823.66 tCO_2e compared to diesel-operated vehicles for FY 2024-25.

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

HCLTech has a robust business continuity plan. The detail of the business continuity plan is as follows:

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 21st Century Enterprise is often measured by its resilience to threats, and how efficiently the Company responds to and manages 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 has 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 & global best practices. The Company undertakes 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, personnel, 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 Company's operations may be affected due to core-technical risks materializing in Company's environment like technology failures, programming errors, cyberattacks etc. In order to mitigate these risks, the Company has embedded 'Resilience-by-Design' across the firm 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 conducts 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, the Company's 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.

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

   Not Applicable.

   Our Request for Proposals (RFPs), at the vendor selection stage, incorporate ESG criteria to ensure that sustainability is a factor in supplier selection. Suppliers are evaluated based on their commitment to ESG standards, which helps us align our supply chain practices with our sustainability goals. We also employ a risk-based assessment approach to vendor onboarding which includes various aspects of the vendor operations, including adherence to ESG criteria along with pre-qualification on E&OHS (Environment & Occupational Health and Safety) parameters ensuring that the supplier meet our standards for sustainability and ethical practices. This helps the Company to proactively address the issues before onboarding the partner. As the risks are mitigated at source level, no significant adverse impact on environment associated with value chain of entity was identified.

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

S. No.	No. of value chain partners assessed	% of value chain partners (by the value of businesses done with such partners) that were assessed	Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard
1	236	72%	No significant adverse impacts identified

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

   HCLTech, through HCLFoundation, drives tree plantation activities. In total, we have planted over 3.2 million saplings. However, these tree plantation drives are not registered under the Green Credit Program. Hence, not applicable.

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.**

   36

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

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	National Association of Software and Service companies ("NASSCOM")	International
2	Confederation of Indian Industry ("CII")	International
3	Associated Chambers of Commerce & Industry of India	International
4	US Chamber of Commerce	International
5	USIBC (US India Business Council)	International
6	USISPF (US India Strategic Partnership Forum)	International
7	Australia-India Business Council	International
8	Indo-French Chamber of Commerce and Industry	International
9	Japan Chamber of Commerce & Industry in India	International
10	Trans-Tasman Business Circle	International

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

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

Leadership Indicators

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

S. No.	Public policy advocated	Method resorted to such advocacy	Whether information is available in the public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly/ Others – please specify)	Web Link, if available
1	Extension of flexible hybrid working model in the SEZs for IT industry for a period of three years starting Jan 1, 2025	Participation in meetings organized by NASSCOM to share industry view and rationale for the extension	Yes	As and when required	NA
2	Grant of Industry Status to IT sector in Uttar Pradesh	Representations made to the State Government directly and through industry associations such as NASSCOM, etc.	Yes	As and when required	NA
3	Digital Personal Data Protection Act, 2023 (DPDP Act): Recommendations submitted on Draft DPDP Rules 2025	Participated in the consultation process facilitated by NASSCOM; Submitted recommendations on DPDP Rules 2025	Yes	As and when required	NA
4	Ministry of Electronics and Information Technology (MEITY) published a report on "AI Governance Guidelines Development" for public consultation on January 6, 2025	Submitted inputs for the report to NASSCOM	Yes	As and when required	NA
5	Submitted suggestions for New Roadmap for Australia's Economic Engagement with India launched in Victoria by the Prime Minister, the Foreign Minister and the Trade Minister	Directly engaging with the Ministry and through chambers	Yes	As and when required	https://www.dfat.gov.au/sites/default/files/new-roadmap-australias-economic-engagement-india.pdf
6	Submission of Safe and Responsible Artificial Intelligence in Health Care – Legislation and Regulation Review in Australia	Meetings, Advocacy	Yes	As and when required	https://consultations.health.gov.au/medicare-benefits-and-digital-health-division/safe-and-responsible-artificial-intelligence-in-he/

S. No.	Public policy advocated	Method resorted to such advocacy	Whether information is available in the public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly/ Others – please specify)	Web Link, if available
7	Proposed Mandatory Guardrails for AI: Australian Tech Industry roundtable by Dept of Industries	Meetings with the Dept of Industries	No	As and when required	NA
8	Guardrails for AI in US	Meetings, Submission of inputs to chambers	No	As and when required	NA
9	Responsible AI in US	Meetings, Advocacy	No	As and when required	NA

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.**

   Not Applicable

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

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

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

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

Particulars	FY 2024–25	FY 2023–24
Directly sourced from MSMEs/ small producers	10%	11.58%
Directly from within India	83%	93.00%

Note: Data pertains to procurement in India.

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

Location	FY 2024–25	FY 2023–24
Rural	0	0
Semi-urban	0	0
Urban	0	0
Metropolitan	100%	100%

*(**Note:** Places categorized as per RBI Classification System for rural/semi–urban/urban/metropolitan.)*

Leadership Indicators

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

   Not Applicable

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

S. No	State	Aspirational District	Amount Spent (in ₹)
1	Chhattisgarh	Bastar	18,229,006
2	Chhattisgarh	Korba	2,500,000
3	Karnataka	Raichur	675,675
4	Karnataka	Yadgir	675,675
5	Madhya Pradesh	Guna	7,625,850
6	Madhya Pradesh	Vidisha	3,333,333
7	Nagaland	Kiphire	208,333
8	Rajasthan	Karauli	3,750,000
9	Tamil Nadu	Ramanathapuram	12,236,784

3.(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 implemented a procurement policy that emphasizes the advancement of small, local, and diverse businesses. The definition of "diverse" may vary depending on the country, but it generally encompasses underrepresented segments of the population such as local minorities, gender, veteran, sexual orientation, disability, economically disadvantaged, and others.

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

   We identify following as marginalized/vulnerable - Minority Business Enterprise (MBE), Women Business Enterprise (WBE), Self-Certified Small Disadvantaged Business (SC-SDB), Disadvantaged Business Enterprise (DBE), Woman-Owned Small Business (WOSB), Economically Disadvantaged Woman-Owned Small Business (ED-WOSB), HUB Zone (HUBZone), Veteran Owned Business (VET), MSME (Micro-Small-Medium Enterprise) - India Only, Historically Black Colleges and Universities (HBCU), Lesbian, Gay, Bisexual, Transgender (LGBT), Alaskan Native (ANC), Disabled, AbilityOne Program, Small Business Enterprise (SBE), Airport Concession Disadvantaged Business Enterprise (ACDBE), B-BBEE (Broad-Based Black Economic Empowerment),SME (Small to Medium sized Enterprise) - UK Only, SBA 8(a), Service Disabled Veteran (SDVET).

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

   Globally, our diverse spending is 21% of the total procurement spend. For combined US, Canada & UK, the spend is 31% 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 benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1	HCLFoundation's flagship program, UDAY, is designed to break the cycle of urban poverty in the immediate neighborhoods of the city, where HCLTech has a presence. Currently, the program operates in eleven cities throughout India, including Noida, Chennai, Bengaluru, Lucknow, Nagpur, Madurai, Vijayawada, Coimbatore, Hyderabad, Kolkata, and Pune	1,240,452	100%
2	The HCLTech Grant is a flagship program of HCLFoundation, which recognizes, strengthens, and empowers NGOs working in the field of rural development. The grant is awarded to PAN India in three thematic categories: Environment, Health, and Education	2,193,507	100%
3	HCLFoundation's flagship environment action program, Harit, aims to promote the conservation, restoration, and enhancement of indigenous environmental systems in a sustainable manner through community engagement. The program is currently operational in eighteen states of India, namely Uttar Pradesh, Tamil Nadu, Karnataka, Maharashtra, Andhra Pradesh, Telangana, Odisha, West Bengal, Uttarakhand, Rajasthan, Madhya Pradesh, Sikkim, Arunachal Pradesh, Assam, Meghalaya, Mizoram, Nagaland and Tripura.	52,254	100%
4	Samuday is a flagship program that pioneers sustainable, scalable, and replicable models for the economic and social development of rural areas. This program is run in partnership with central and state governments, local communities, NGOs, knowledge institutions, and allied partners. Crafting an integrated approach, Samuday implements effective interventions across the areas of Agriculture, Education, Health, Infrastructure, Livelihood, and WASH (Water, Sanitation & Hygiene). The program focuses on creating a source code for the comprehensive development of rural areas of Hardoi & Thoothukudi.	3,015,612	100%
5	"My Clean City" is a program aimed at implementing effective solid waste management in Noida and Greater Noida through the transformation of cities into waste-free regions by covering residential welfare associations and urban villages through a range of sustainable strategies.	654,160	100%
6	HCLFoundation is dedicated to assisting the country during times of calamity, whether natural or man-made. The Foundation's Disaster Risk Reduction and Management (DRR/M) efforts in India includes mitigation, relief and response, rehabilitation, and build-back-better projects. The program strives to mitigate the effect of catastrophes and humanitarian crises by supporting people in need.	438,578	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.**

    HCLTech has an institutionalized process to help clients raise grievances and complaints related to its business conduct. This includes:

    Customer Advisory Board (CAB) – This consists of CXOs from our strategic accounts, across a variety of industries. The CAB member's perspectives, insights, and directional guidance help HCLTech to better address clients.

    - CREST – Through a governance framework called CREST, HCLTech has institutionalized the process of cadence meetings and the process of checking in regularly with clients. Any client complaints or escalations as received by the LOB heads are picked up by the respective delivery owners, and actions are taken to address their concerns.

This is then reviewed as a part of the Quarterly Business Review ("QBR") or Executive Business Review ("EBR") which is attended by the LOB heads along with clients and tracked as a part of CREST.

- ACSAT & PCSAT - HCLTech measures client satisfaction both at the project level as well as engagement level. At project level, HCLTech, under its Project CSAT (PCSAT) initiative, surveys 4000+ 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 client feedback. Taking action on client feedback is the key tenet of client centricity and has helped us improve the relationship with Client and enhance our services over the years. CRISP is an acronym for Client Relationship Improvement and Solutioning Partnership.

- HCLTech's account management teams also connect with their respective clients on a monthly basis to capture their feedback and highlight the same internally. The account teams accordingly take proactive actions to prevent any dissatisfaction.

- 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@hcltech.com wherein any complaints related to Unethical and Improper Practices will be dealt with by this Policy. Any HR related complaints are forwarded to hear@hcltech.com.

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

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

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

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

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

Particulars	FY 2024–25			FY 2023–24		
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	NIL	NIL	NIL	NIL	NIL	NIL
Advertising	NIL	NIL	NIL	NIL	NIL	NIL
Cyber-security	NIL	NIL	NIL	1	NIL	NIL
Delivery of essential services	Not Applicable	Not Applicable	-	Not Applicable	Not Applicable	-
Restrictive Trade Practices	NIL	NIL	NIL	NIL	NIL	NIL
Unfair Trade Practices	NIL	NIL	NIL	NIL	NIL	NIL
Other	NIL	NIL	NIL	NIL	NIL	NIL

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

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

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

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

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

    Yes.

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

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

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

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

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

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

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

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

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

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

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

    No reported incident is underway with Regulators.

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

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

       Two, no material breaches

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

       Zero data breaches involving personally identifiable information of clients

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

There was no material impact in any incident of data breach

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

Leadership Indicators

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

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

   We educate our clients and consumers about the responsible use of AI, that addresses the aspects of bias, ethics, accountability, safety in development and deployment of AI.

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

   Not applicable

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

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

   HCLTech believes that customer engagement is a strategic collaboration to manage, fulfill & add value.

   A-CSAT is a comprehensive customer feedback framework to gather customer inputs and feedback that helps us enhance our services and align with customer expectations. Every year, HCLTech reaches out to 4000+ customer stakeholders across 600+ global accounts for sharing with us their invaluable feedback on services offered by us. The Survey is administered by an independent third-party consultant across all geographies.

INDEPENDENT ASSURANCE STATEMENT
to the Management of HCL Technologies Ltd

HCL Technologies Ltd (Corporate Identity Number L74140DL1991PLC046369, hereafter referred to as 'HCLTech' or 'the Company') commissioned DNV Business Assurance India Private Limited ('DNV', 'us' or 'we') to undertake an independent and reasonable level of assurance of the Company's disclosures in the Business Responsibility and Sustainability Report (hereafter referred as 'BRSR'). The disclosures include the BRSR Core attributes as per Annexure 17A and the non-financial disclosures as per Annexure 16 of the Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/0155, dated November 11, 2024.

Our Conclusion:

Reasonable level of Assurance- BRSR Core

Based on our review and procedures followed for a reasonable level of assurance, DNV is of the opinion that, in all material aspects the BRSR Core Key Performance Indicators (KPIs) under 9 ESG attributes (as listed in Annexure I of this statement) for FY 2024-25 are reported in accordance with reporting requirements outlined in Industry Standard on Reporting of BRSR Core.

Limited Level of Assurance- BRSR Disclosures

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

Scope of Work and Boundary

The scope of our engagement includes a reasonable level of assurance for the 'BRSR Core' indicators and a limited Level of Assurance for the remaining non-financial disclosures in BRSR, for the Financial Year (FY) 2024-25.

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

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

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

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

Our competence, and Independence

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

This engagement work was carried out by an independent team of sustainability assurance professionals. During the reporting period i.e. FY 2024-25, DNV, to the best of its knowledge, was not involved in any non-audit/non-assurance work with the Company and its Group entities which could lead to any Conflict of Interest. DNV was not involved in the preparation of any statements or data included in the Report except for this Assurance Statement. DNV maintains complete impartiality toward stakeholders interviewed during the assurance process.

Reporting Criteria and Standards

The disclosures have been prepared by HCLTech in reference to:

- Industry Standard on Reporting of BRSR Core, Circular No.: SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177 dated Dec 20, 2024.
- BRSR Core (Annexure 17A) and BRSR reporting guidelines (Annexure 16) as per Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/0155, dated November 11, 2024.
- Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard.
- ISO 14064-1:2018 - Specification with guidance at the organization level for quantification and reporting of greenhouse gas emissions and removals

Assurance Methodology/Standard and Level of Assurance

This assurance engagement has been carried out in accordance with DNV's VeriSustain™ protocol, V6.0, which is based on our professional experience and international assurance practice, and the international standard in Assurance Engagements, ISAE 3000 (revised) - Assurance Engagements other than Audits or Reviews of Historical Financial Information. DNV's VeriSustain™ Protocol, V6.0 has been developed in accordance with the most widely accepted reporting and assurance standards. DNV conducted Reasonable Level of assurance for BRSR Core KPIs under 9 ESG attributes; and Limited Level of assurance for rest non-financial disclosures in BRSR.

Basis of our conclusion

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

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

In both the cases, DNV teams conducted the:

- Interviews with selected senior managers responsible for management of disclosures and review of selected evidence to support environmental KPIs and metrics disclosed the Report. We were free to choose interviewees and interviewed those with overall responsibility of monitoring, data collation and reporting the selected indicators.

- Verification of the consolidated reported performance disclosures in context to the Principle of Completeness as per VeriSustainTM Protocol, V6.0 for both reasonable level and limited level of assurance for the disclosures.

Inherent Limitations

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

- The assurance engagement considers an uncertainty of ±5% based on materiality threshold for estimation/ measurement errors and omissions.

- DNV has not been involved in evaluation or assessment of any financial data/performance of the company. DNV's opinion on specific BRSR Core Attribute 8 on "Number of days of accounts payable", Attribute 9 "Open-ness of business" and all sections of BRSR indicators where currency or INR has been applied relies on the third party audited financial reports of the Company. DNV does not take any responsibility of the financial data reported in the audited financial reports of the Company.

- The assessment is limited to data and information within the defined Reporting Period. Any data outside this period is not considered within the scope of assurance.

- Data outside the operations specified in the assurance boundary is excluded from the assurance, unless explicitly mentioned otherwise in this statement.

- The assurance does not cover the Company's statements that express opinions, claims, beliefs, aspirations, expectations, aims, or future intentions. Additionally, assertions related to Intellectual Property Rights and other competitive issues are beyond the scope of this assurance.

- The assessment does not include a review of the Company's strategy or other related linkages expressed in the Report. These aspects are not within the scope of the assurance engagement.

- The assurance does not extend to mapping the Report with reporting frameworks other than those specifically mentioned. Any assessments or comparisons with frameworks beyond the specified ones are not considered in this engagement.

- Aspects of the Report that fall outside the mentioned scope and boundary are not subject to assurance. The assessment is limited to the defined parameters.

- The assurance engagement does not include a review of legal compliances. Compliance with legal requirements is not within the scope of this assurance, and the Company is responsible for ensuring adherence to relevant laws.

Responsibility of the Company

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

DNV's Responsibility

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

For DNV Business Assurance India Private Limited,	
Chandan Sarkar	Anjana Sharma
Lead Verifier	Assurance Reviewer

Assurance Team: Jas Sahib Singh Chadha, Suraiya Rahman, R. Mohan Krishnan, Poornachander Maratha

04/07/2025, Bengaluru, India.

ANNEXURE I

1. BRSR Core Verified Data- for reasonable level of assurance

Stipulated as per BRSR Core provided by the company.

Sr. No.	Attribute	BRSR Core Parameter	Unit	Verified Value for FY 2024–25
1	Green-house gas (GHG) footprint	Total Scope 1 emissions	MT of CO_2e	12,900.50
		Total Scope 2 emissions	MT of CO_2e	109,074.02
		Total Scope 1 and Scope 2 emission intensity per rupee of turnover	Metric tons of CO_2 equivalent/ million ₹	0.10
		Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)	Metric tons of CO_2 equivalent/ million USD adjusted for PPP	2.13
		Total Scope 1 and Scope 2 emission intensity in terms of physical output	Metric tons of CO_2 equivalent/ FTE	0.55
2	Water footprint	Total water consumption	KL	834,013.09
		Water consumption intensity	KL/Million ₹	0.71
			KL/Million USD adjusted for PPP	14.56
		Water intensity in terms of physical output	KL/FTE	3.73
		Water Discharge by destination and levels of Treatment	KL	15,915.25
3	Energy footprint	Total energy consumed	Gigajoules (GJ)	940,692.98
		% of energy consumed from renewable sources	In % terms	34.38%
		Energy intensity	GJ/Million ₹	0.80
			GJ/Million USD adjusted for PPP	16.42
			GJ/FTE	4.21

Sr. No.	Attribute	BRSR Core Parameter	Unit	Verified Value for FY 2024-25
4	Embracing circularity – details related to waste management by the entity	Plastic waste (A)	MT	10.73
		E-waste (B)	MT	156.30
		Bio-medical waste (C)	MT	4.37
		Construction and demolition waste (D)	MT	39.25
		Battery waste (E)	MT	82.67
		Radioactive waste (F)	MT	0.00
		Other Hazardous Waste (G)	MT	21.68
		Other Non-Hazardous Waste (H)	MT	1,488.01
		Total (A+B + C + D + E + F + G+ H)	MT	1,803.01
		Waste intensity per rupee of turnover from operations	MT	0.0015
		Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)	MT/Million ₹	0.03
		Waste intensity in terms of physical output	MT/Million USD adjusted for PPP	0.0081
		Total waste recovered through recycling, re-using or other recovery operations		
		(i) Recycled	MT	1,660.28
		(ii) Re-used	MT	
		Total	MT	1,660.28
		Waste Recycled, Recovered /Total Waste generated	%	92%
		total waste disposed by nature of disposal method		
		(i) Incineration	MT	9.17
		(ii) Landfilling	MT	
		(iii) Other disposal options	MT	
		Total	MT	9.17
		Waste disposed /Total Waste generated	%	1%
5	Enhancing Employee Wellbeing and Safety	Spending on measures towards well-being of employees and workers – cost incurred as a % of total revenue of the company (Excluding Workers)	In % terms	2.21%
		Details of safety related incidents for employees and workers (including contract-workforce e.g. workers in the company's construction sites)	Total recordable work-related injuries	0
			Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	0.0088843
			No. of fatalities	0
6	Enabling Gender Diversity in Business	Gross wages paid to females as % of wages paid	In % terms	20.49%
		Complaints on PoSH	Total Complaints on Sexual Harassment (POSH) reported	44
			Complaints on PoSH as a % of female employees/workers	0.09%
			Complaints on PoSH upheld	30

Sr. No.	Attribute	BRSR Core Parameter	Unit	Verified Value for FY 2024–25
7	Enabling Inclusive Development	Input material sourced from following sources as % of total purchases and from within India	Directly sourced from MSMEs/ small producers	10%
		Job creation in smaller towns – Wages paid to persons employed in smaller towns (permanent or non-permanent /on contract) as % of total wage cost	Sourced directly from within India	83%
			Location	
			Rural	0%
			Semi-urban	0%
			Urban	0%
			Metropolitan	100%
8	Fairness in Engaging with Customers and Suppliers	Instances involving loss/breach of data of customers as a percentage of total data breaches or cyber security events	In % terms	0%
		Number of days of accounts payable	(Accounts payable *365)/Cost of goods/services procured	44.40
9	Open-ness of business	Concentration of purchases & sales done with trading houses, dealers, and related parties Loans and advances & investments with related parties	Purchases from trading houses as % of total purchases	Not Applicable
			Number of trading houses where purchases are made from	Not Applicable
			Purchases from top 10 trading houses as % of total purchases from trading houses	Not Applicable
			Sales to dealers/distributors as % of total sales	4.59%
			Number of dealers/distributors to whom sales are made	1,612
			Sales to top 10 dealers/ distributors as % of total sales to dealers/distributors	32.81%
			Share of RPTs (as respective %age) in	
			Purchases	0.16%
			Sales	0.03%
			Loans & advances	0.00%
			Investments	0.00%

2. BRSR Disclosures- Limited level of assurance

- Section A: General Disclosures- 20-a, b, 21, 22, 25
- Section C: Principle Wise Performance Disclosure-
  - Principle 1: Essential Indicator 1, 2;
  - Principle 3: Essential Indicator 1-a, b, 2, 5, 7, 8, 9, 11, 13, 14; Leadership Indicator 3, 5;
  - Principle 5: Essential Indicator 1, 2, 6, 10; Leadership Indicator 4;
  - Principle 6: Essential Indicator 6, Leadership Indicator 1, 2, 7;
  - Principle 8: Essential Indicator 4, 5; Leadership Indicator 1, 2, 3, 6;

ANNEXURE II – Sites selected for audits

S.no	Site	Location
1.	Corporate Office	NCR-Campus, Noida
2.	India Sites (onsite)	NCR-Campus, Noida, Chennai-Elcot Campus, Bengaluru – Jigani Campus
3.	India Sites (remote audit)	Madurai, Pune, Nagpur, Hyderabad, Lucknow
4.	International Sites (remote audit)	Canada-Mississauga, Vancouver; SriLanka- Colombo; Mexico-Minerva, Vista; USA-Jersey City, Frisco, Parsippany; UK-London-3F & 6F, Watford-1F-2F