

DXC Global Reporting Initiative (GRI) Report - 2021

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Preamble

DXC Technology, the world's leading independent, end-to-end IT services company, manages and modernizes mission-critical systems, integrating them with new digital solutions to produce better business outcomes. Our global reach and talent, innovation platforms, technology independence, and extensive partner network enable more than 6,000 private and public-sector customers in 70 countries to thrive on change. For more information, visit www.dxc.com.

This report presents DXC data for its fiscal year 2021 (FY21), from April 1, 2020, through March 31, 2021. DXC Technology has reported in accordance with the latest GRI Standards for the period April 1, 2020 through March 31, 2021. This report has been reviewed and approved by DXC's highest governance body.

EXPLANATORY NOTE:

This Global Reporting Initiative (GRI) report does not include the financial results for DXC.

For financial information, please refer to our Annual Report on Form 10-K for the fiscal year ended March 31, 2021, which was filed May 28, 2021, with the Securities and Exchange Commission (SEC), and any updated information in subsequent SEC filings, available on DXC's website (https://s27.q4cdn.com/120381974/files/doc_financials/2021/ar/DXC-AnnualReport-2021.pdf) and through the SEC's EDGAR system (<https://www.sec.gov/ix?doc=/Archives/edgar/data/1688568/000168856821000029/dxc-20210331.htm>).

Materiality assessment

To help define our key environmental, social and governance (ESG) and sustainability objectives, DXC has undertaken a materiality analysis. Our goal: ensure that DXC is a responsible and sustainable company on a global scale. We support our customers in their own sustainability objectives, and we help them to achieve clear business benefits from sustainable best practices.

Our materiality assessment process includes internal and external feedback, which enables us to rigorously evaluate our social, environmental and governance issues. It also helps us assess how closely our sustainability actions align with our objectives. Stakeholder dialogues – including meetings and interviews – provide us with new insights and help us to understand and report on topics of special significance.

During the materiality assessment, we first identify issues, then evaluate their business impacts. With this approach, we can analyze our current state with efficiency, address risks and emerging challenges, establish our ambition levels, create, and prioritize goals, assign resources and set roadmaps. DXC recognizes the importance of leading sustainably, and continually strives to improve our knowledge of what we and our stakeholders value most.

1 Global Reporting Initiative 2: General Disclosures

1.1 The Organization and Its Reporting Practices

Disclosure 2-1: Organizational Details

- a. **Report its legal name:** DXC Technology; <https://www.dxc.com>
- b. **Report its nature of ownership and legal form:** Annual Report 2021; https://s27.q4cdn.com/120381974/files/doc_financials/2021/ar/DXC-AnnualReport-2021.pdf
- c. **Report the location of its headquarters:** DXC Corporate Office, 20408 Bashan Drive, Suite 231, Ashburn, VA 20147
- d. **Report its countries of operation:** Argentina, Australia, Austria, Belgium, Brazil, Brunei, Bulgaria, Canada, Chile, China, Colombia, Costa Rica, Croatia, Czechia, Denmark, Egypt, Fiji, Finland, France, Germany, Hong Kong, Hungary, India, Indonesia, Ireland, Israel, Italy, Japan, Jordan, Republic of Korea, Lithuania, Luxembourg, Malaysia, Mexico, Morocco, Netherlands, New Zealand, Nigeria, Norway, Panama, Peru, Philippines, Poland, Portugal, Puerto Rico, Romania, Russian Federation, Saudi Arabia, Serbia, Singapore, Slovakia, South Africa, Spain, Sweden, Switzerland, Taiwan, Thailand, Tunisia, United Arab Emirates, United Kingdom, United States of America, Vietnam

Disclosure 2-2: Entities Included in the Organization's Sustainability Reporting

- a. **List all its entities included in its sustainability reporting:** The financial statements include DXC's accounts, our consolidated subsidiaries, and those business entities in which we maintain a controlling interest; https://s27.q4cdn.com/120381974/files/doc_financials/2021/ar/DXC-AnnualReport-2021.pdf#page=75, p.75
- b. **If the organization has audited or consolidated financial statements or financial information filed on public record, specify the differences between the list of entities included in its financial reporting and the list included in its sustainability reporting:** Not applicable
- c. **If the organization consists of multiple entities, explain the approach used for consolidating the information, including:**
 - i. **Whether the approach involves adjustments to information for minority interests:** Where data is available for minority interests, it is included in our aggregated reporting.
 - ii. **How the approach takes into account mergers, acquisitions, and disposal of entities or parts of entities:** All disposals and acquisitions are included.
 - iii. **Whether and how the approach differs across the disclosures in this Standard and across material topics:** We apply a consistent approach across all disclosures.

Disclosure 2-3: Reporting Period, Frequency, and Contact Point

- a. **Specify the reporting period for, and the frequency of, its sustainability reporting:** Annual
- b. **Specify the reporting period for its financial reporting, and, if it does not align with the period for its sustainability reporting, explain the reason for this:** Our FY21 (April 1, 2020 – March 31, 2021)
- c. **Report the publication date of the report or reported information:** December 2021
- d. **Specify the contact point for questions about the report or reported information:** Sue Ann Averitte, Vice President Environmental, Social and Governance (ESG) and Continuous Improvement

Disclosure 2-4: Restatements of Information

- a. **Report restatements of information made from previous reporting periods and explain:** We have not issued any restatements

Disclosure 2-5: External Assurance

- a. **Describe its policy and practice for seeking external assurance, including whether and how the highest governance body and senior executives are involved:** Our Scope 1 and 2 emissions, along with Scope 3 business travel emissions, have been externally assured for a number of years to ISO 14064-3:2019. We seek external assurance for our emissions to ensure accuracy and continuous improvement against our targets. External assurances are signed off by Sue Ann Averitte, Vice President Environmental, Social and Governance (ESG) and Continuous Improvement, and reviewed with our Chief Operating Officer (COO), Chris Drumgoole.
- b. **If the organization's sustainability reporting has been externally assured:** External verification has been provided by Carbon Intelligence Energy Services Ltd for FY21 greenhouse gas (GHG) emissions. In FY19 and FY20, limited assurance of GHG emissions was provided by Lloyd's Register (LR): Independent Assurance Statement Related to the DXC Technology Services, LLC Greenhouse Gas Assertion on Operational Control Emissions for the Financial Year April 1, 2019 to March 31, 2020, pp.1-2 (<https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-ISO-14064-3-Verification-Statement.pdf>). Our GHG reporting is aligned to the requirements of the GHG protocol and is externally verified in accordance with ISO 14064-3:2019.

1.2 Activities and Workers

Disclosure 2-6: Activities, Value Chain, and Other Business Relationships

- a. **Report the sector(s) in which it is active:** We serve government and business customers only (not individuals), from all sectors globally
- b. **Describe its value chain:** We have a global supply chain management function that encompasses the planning and management of activities involved in the sourcing and procurement of goods and services from third-party suppliers worldwide to secure the sustainable success of our customers by providing innovative solutions for products and services.

Key spend areas include software, hardware, services, and labor. The supply chain management function plays an important role in developing and implementing global and regional category and supplier management strategies that aim to form strong partner relationships and continuous improvement in the areas of price, quality, and services.

We operate in more than 70 countries and help more than 240 Fortune 500 companies run their mission critical systems and operations while modernizing IT, optimizing data architectures, and ensuring security and scalability across public, private, and hybrid clouds. The world's largest companies and public sector organizations trust us to deploy services across the Enterprise Technology Stack to drive new levels of performance, competitiveness, and customer experiences.

- c. **Report other relevant business relationships:** Our partner ecosystem enables our customers to harness the power of the Enterprise Technology Stack at scale and transform their businesses through joint business objectives, investments, innovation and co-development with our partners.

We partner with AWS, Microsoft Azure, Google Cloud, and VMware for cloud infrastructure and SAP and Red Hat for cloud platforms. All of our cloud partners have commenced their decarbonization journeys. By working with partners that offer decarbonization pathways, we are able to provide added value to customers beyond price reductions by aligning with their decarbonization goals and ensuring that the carbon reductions associated with our offerings are factored into decision-making processes.

For more information, please visit our Partner Ecosystem webpage at <https://dxc.com/us/en/about-us/partner-ecosystem>

- d. **Describe significant changes in 2-6-a, 2-6-b, and 2-6-c compared to the previous reporting period:** Not applicable, there have been no significant changes compared to the previous reporting period.

Disclosure 2-7: Employees

- a. **Report the total number of employees and a breakdown of this total by gender and by region**

DXC Global Head Count by Gender: FY21

Female

Count Region	Grand Total
Americas	8,217
Asia	17,607
Australia and New Zealand	1,530
Central and Northern Europe	7,848
Southern Europe	4,102
UKI, Middle East, and Africa	2,494
Grand Total	41,796

Male

Count Region	Grand Total
Americas	15,602
Asia	37,044
Australia and New Zealand	4,139
Central and Northern Europe	17,285
Southern Europe	7,223
UKI, Middle East, and Africa	6,939
Grand Total	88,235

Unknown

Count Region	Grand Total
Americas	79
Asia	21
Australia and New Zealand	16

Count Region	Grand Total
Central and Northern Europe	125
Southern Europe	729
UKI, Middle East, and Africa	26
Grand Total	996

b. Report the total number of:

- i. Permanent employees, and a breakdown by gender and by region
- ii. Temporary employees, and a breakdown by gender and by region
- iii. Nonguaranteed hours employees, and a breakdown by gender and by region: Not applicable
- iv. Full-time employees, and a breakdown by gender and by region
- v. Part-time employees, and a breakdown by gender and by region

Activity Month: March 2021

Count of Employee ID Employee Type	Gender Female	Male	Unknown	Grand Total
Americas	8,217	15,602	80	23,899
Casual	16	37	1	54
Fixed Term		1		1
International Assignee	71	577		648
Lux Employee	235	855		1,090
Lux Intern	1	1		2
Lux Temp	5	6		11
Regular	7,869	14,071	79	22,019
Temporary/Fixed Term	20	54		74
Asia-Pacific	19,137	41,183	37	60,357
Casual	22	55		77
Fixed Term	91	135	1	227
International Assignee	6	21		27
Lux Employee	406	1,087		1,493
Regular	18,572	39,805	36	58,413
Temporary/Fixed Term	40	80		120

Count of Employee ID Employee Type	Gender			Grand Total
	Female	Male	Unknown	
Europe, the Middle East, and Africa	14,442	31,450	879	46,771
Casual	1	4		5
FDS Employee	453	1,840	507	2,800
Fixed Term	24	49		73
International Assignee	14	108		122
Lux Employee	2,352	6,095		8,447
Lux Intern	3	6		9
Lux Private Ent	819	2,378		3,197
Regular	10,515	20,144	371	31,030
Temporary/Fixed Term	18	63		81
Unknown	243	763	1	1,007
Grand Total	41,796	88,235	996	131,027

- c. **Describe the methodologies and assumptions used to compile the data, including whether the numbers are reported:** Data is collected and reported by our Human Resources (HR) analytics team. Data shared is based on head count as of FY21.
- d. **Report contextual information necessary to understand the data reported under 2-7-a and 2-7-b:** Data is collected and reported by our HR analytics team.
- e. **Describe significant fluctuations in the number of employees during the reporting period and between reporting periods:** We have temporary/fixed-contract employees, but they do not work in seasonal variances.

Disclosure 2-8: Workers Who Are Not Employees

- a. **Report the total number of workers who are not employees and whose work is controlled by the organization and describe:** Not applicable to DXC
- b. **Describe the methodologies and assumptions used to compile the data, including whether the number of workers who are not employees is reported:** Not applicable to DXC
- c. **Describe significant fluctuations in the number of workers who are not employees during the reporting period and between reporting periods:** Not applicable to DXC

1.3 Governance

Disclosure 2-9: Governance Structure and Composition

- a. **Describe its governance structure, including committees of the highest governance body:** For information on the governance structure of our organization, including committees of the highest governance body, see <https://dxc.com/us/en/about-us/leadership-and-governance>
- b. **List the committees of the highest governance body that are responsible for decision making on and overseeing the management of the organization's impacts on the economy, environment, and people:** The Board has three standing committees: the Audit Committee, the

Compensation Committee, and the Nominating/Corporate Governance Committee. ([Source: SEC filing, p.25](#))

c. Describe the composition of the highest governance body and its committees by:

- i. Executive and nonexecutive members:** Our Board of Directors consists of 1 executive member, the chief executive officer (CEO), and 11 independent members
- ii. Independence:** Our Board leadership structure consists of an independent chairman of the board, a CEO, and independent chairs for our Audit Committee, Compensation Committee and Nominating/Corporate Governance Committee. The Board of Directors has determined that this leadership structure, which separates the chairman and CEO roles, provides independent Board leadership and engagement and is appropriate at this time considering our transformation journey and operating environment.
The Board has determined that, except for Michael J. Salvino, president and CEO of DXC Technology, all of our director nominees, namely, Mukesh Aghi, Amy E. Alving, David A. Barnes, Raul J. Fernandez, David L. Herzog, Mary L. Krakauer, Ian C. Read, Dawn Rogers, Manoj P. Singh, Akihiko Washington, and Robert F. Woods, are independent for the purposes of our Corporate Governance Guidelines. The Board also determined that, except for Michael J. Salvino, president and CEO of DXC Technology, all of our directors during FY21 were independent.
- iii. Tenure of members on the governance body:** Average tenure is 2.3 years
- iv. Number of other significant positions and commitments held by each member, and the nature of the commitments:** We have a highly effective and engaged Board, and we believe that our directors' outside directorships enable them to contribute valuable knowledge and experience to our Board. Nonetheless, the Board is sensitive to the external obligations of its directors and the potential for overboarding. Our Corporate Governance Guidelines provide that directors should not serve as a director of another company if doing so would create actual or potential conflicts or interfere with their ability to devote sufficient time and effort to their duties as a director of DXC. Directors who have a full-time job should not serve on the boards of more than three other public companies, and directors who do not have a full-time job should not serve on the boards of more than four other public companies.
- v. Gender:** 25% of our Board members are female.
- vi. Underrepresented social groups:** 33% of our Board members are from underrepresented social groups

vii. Competencies relevant to the impacts of the organization:

Top Skills	Leadership and Management	Public Company Governance	Industry	Audit and Financial Expertise	Enterprise Transformation and Culture Building	Capital Markets and Treasury	Technology and Information Security	Principal Occupation	Other Public Company Boards
Mukesh Agni	•	•	•		•			President and Chief Executive Officer of USISPF (US-India Strategic Partnership Forum) and current member of Hindustan Media Ventures Ltd (HMVL) (India) board	1
Amy E. Alving	•	•	•	•	•		•	Former Chief Technology Officer of Leidos and current member of Fannie Mae and Howmet Aerospace boards	2
David A. Barnes	•	•	•	•			•	Former Senior Vice President, Chief Information and Global Business Services Officer of United Parcel Service (UPS) and current member of Hertz board	1
Raul J. Fernandez	•	•	•	•	•		•	Vice Chairman and co-owner of Monumental Sports & Entertainment and current member of Broadcom and Capitol Investment Corp. V boards	2
David A. Herzog	•	•		•	•	•		Former Chief Financial Officer of AIG and current member of MetLife, AMBAC Financial Group and PCCW Limited (Hong Kong) boards	3
Mary L. Krakauer	•	•	•		•		•	Former Executive Vice President and Chief Information Officer of Dell Corporation and current member of Mercury Systems and Xilinx boards	2
Dawn Rogers	•	•		•	•			Director of Human Capital at American Securities LLC and former Executive Vice President and Chief Human Resources Officer at Pfizer	-
Ian C. Read	•	•		•	•	•		Chairman of DXC Technology, Executive Chairman of Population Health Investment Co., Inc., former Executive Chairman and CEO of Pfizer and current member of Kimberly-Clark Corporation and Viatrix Inc. boards	3
Michael J. Salvino	•	•	•		•		•	President and Chief Executive Officer of DXC Technology	-
Manoj P. Singh	•	•	•	•	•		•	Former Chief Operating Officer for Deloitte Global (Deloitte Touche Tohmatsu Ltd.), member of ReNew Energy Global Ltd board and Trustee of The Putnam Funds	1
Akihiko Washington	•	•	•		•			Former Executive Vice President of worldwide human resources for Warner Bros. Entertainment	-
Robert F. Woods	•	•		•		•		Former Senior Vice President and Chief Financial Officer at Sungard Data Systems Inc.	-

viii. Stakeholder representation: We recognize that engaging with external and internal stakeholders is an essential part of responsible business practice, as it helps us define our sustainability strategy, share our progress, and improve our reporting. We do this in a variety of ways, including annual customer surveys, collaboration websites, committee memberships, and face-to-face dialogue.

Disclosure 2-10: Nomination and Selection of the Highest Governance Body

- a. Describe the nomination and selection processes for the highest governance body and its committees:** The Nominating/Corporate Governance Committee is responsible for reviewing and assessing with the Board the appropriate skills, experience, and background sought for Board members in the context of our business and then-current membership on the Board. (Source: SEC 2021, p.1)
- b. Describe the criteria used for nominating and selecting highest governance body members:** The Nominating/Corporate Governance Committee is responsible for reviewing and assessing with the Board the appropriate skills, experience, and background sought for Board members in the context of our business and then-current membership on the Board. This assessment of Board skills, experience, and background involves considering numerous diverse factors, including independence; experience; professional and personal ethics; values, age, gender, and ethnic diversity; and skills and attributes. Our Board is committed to actively seeking women and minority director candidates for consideration.

The Board seeks directors whose expertise achieves a balance across the following skills and attributes:

Leadership and Management: Includes experience as a senior executive in a global public or private organization with practical skills and insights around setting business strategy, overseeing operations, driving cost leadership, facilitating change management, leading transformation, and driving results.

Public Company Governance: Experience with corporate and board governance, including oversight of compliance, risk, regulatory requirements, executive compensation practices, and policies and processes to effectively manage and monitor these, in support of the stockholders' interests.

Industry: Experience in the professional services industry with a good understanding of our strategy, offerings, digital transformation, innovation, customers, marketplace dynamics, and success drivers.

Audit and Financial Expertise: Experience and understanding of areas such as accounting policies and standards, financial reporting, disclosure requirements, financial statements, internal controls, audits (internal and external), complex financial transactions, capital allocation, and mergers and acquisitions.

Enterprise Transformation and Culture Building: Experience in workforce transformation, restructuring, and building a high-performance culture in a complex global environment as the landscape for technology services embraces marketplace-led disruption. Experience aligning HR policies and practices to attract, onboard, develop, and retain top talent in support of our strategic talent plan.

Capital Markets and Treasury: Experience globally in raising funds in the debt and equity markets, managing liquidity and the complex interplay of operational performance, rating agencies, and stockholder relationships.

Technology and Information Security: Experience in senior leadership roles at companies in the technology landscape and an understanding of our enabling technologies (e.g., cloud, artificial intelligence, machine learning, Internet of Things, and Software-as-a-Service). Experience managing information security risks, including an understanding of the information security threat landscape. (Source: [SEC 2021 pp.1-2](#))

Disclosure 2-11: Chair of the Highest Governance Body

- a. **Reporting whether the chair of the highest governance body is also a senior executive in the organization:** Our Board leadership structure consists of an independent chairman of the board, a CEO, and independent chairs for our Audit Committee, Compensation Committee, and Nominating/Corporate Governance Committee. The Board of Directors has determined that this leadership structure, which separates the chairman and CEO roles, provides independent Board leadership and engagement and is appropriate at this time considering our transformation journey and operating environment. (Source: [SEC 2021 p.19](#))
- b. **If the chair is also a senior executive, explain their function within the organization's management, the reasons for this arrangement, and how conflicts of interest are prevented and mitigated:** Not applicable

Disclosure 2-12: Role of the Highest Governance Body in Overseeing the Management of Impacts

- a. **Describe the role of the highest governance body and of senior executives in developing, approving, and updating the organization's purpose, value or mission statements, strategies, policies, and goals related to sustainable development:**

In 2021, we enhanced the governance of the Environmental, Social, and Governance (ESG) program to include a multitiered process involving the Board of Directors, the global leadership team, the ESG Executive Steering Committee, and the ESG Working Group. Each of these governing bodies performs a critical role in ensuring that our approach incorporates broad perspectives to address our stakeholder needs while delivering on our commitment to sustainable business. Additional information can be found within our [2021 Task Force on Climate-related Financial Disclosures \(TCFD\) report, pp.3-4](#). (Source: [SEC 2021 p.19](#))
- b. **Describe the role of the highest governance body in overseeing the organization's due diligence and other processes to identify and manage the organization's impacts on the economy, environment, and people:**

We are committed to maintaining the highest standards of corporate governance.

The Board's responsibilities include, but are not limited to:

- Overseeing the management of our business and the assessment of our business risks
- Overseeing the processes for maintaining integrity with regard to our financial statements and other public disclosures, and compliance with law and ethics
- Reviewing and approving our major financial objectives and strategic and operating plans, and other significant actions
- Overseeing our talent management and succession planning

The Board discharges its responsibilities through regularly scheduled meetings as well as telephonic meetings, action by written consent, and other communications with management, as appropriate. DXC expects directors to attend all meetings of the Board, the Board committees upon which they serve, and all annual meetings of DXC's stockholders at which they are standing for election or re-election as directors.

DXC holds an annual meeting where shareholders can attend and have the ability to ask questions. Our Board members periodically engage with employees and leadership team members and conduct investor outreach through our annual Investor Day and through direct interactions. Our CEO, who is a Board member, holds quarterly town halls with employees and meets with investors, customers, and other interested parties regularly.

We are committed to providing transparency about our Board and committee evaluation process. Our Board utilizes a multipart process for its ongoing self-evaluation to ensure that the Board is operating effectively and that its processes reflect best practices.

- Annual self-evaluations
- External evaluator
- Individual director assessments

(Source: SEC 2021, pp.19–24)

The DXC Board of Directors provides oversight of the ESG program, ensuring we have the governance, long-term strategy, and processes to manage ESG outcomes that meet the needs of stakeholders. DXC's global leadership team, which comprises members of the C-suite and regional business executives, ensures that ESG outcomes are aligned with stakeholder needs. The global leadership team is updated regularly on the broad ESG issues affecting the business. They provide input on the long-term strategy and drive initiatives in the various business areas they oversee. Additional information can be found within our 2021 [TCFD report pp.3–4](#).

c. Describe the role of the highest governance body in reviewing the effectiveness of the organization's processes as described in 2-12-b, and report the frequency of this review:

The Board discharges its responsibilities through regularly scheduled meetings as well as telephonic meetings, action by written consent, and other communications with management, as appropriate. DXC expects directors to attend all meetings of the Board, the Board committees upon which they serve, and all annual meetings of DXC's stockholders at which they are standing for election or re-election as directors. (Source: SEC filing 2021, p.19)

During the fiscal year ended March 31, 2021, DXC held 13 meetings of the full DXC Board of Directors, DXC's Audit Committee held 12 meetings, DXC's Compensation Committee held 10 meetings, and DXC's Nominating/Corporate Governance Committee held five meetings. During the fiscal year ended March 31, 2021, each director attended all of (1) the Board meetings that occurred while he or she was a member of the Board and (2) the meetings held by each Board committee on which he or she served. (Source: SEC filing 2021, p.21)

Disclosure 2-13: Delegation of Responsibility for Managing Impacts

- a. Describe how the highest governance body delegates responsibility for managing the organization's impacts on the economy, environment, and people:** The COO is responsible for DXC's ESG strategy, which involves coordination with other members of the executive leadership team (e.g., chief HR officer, chief financial officer, chief strategy officer, general

counsel, and regional presidents). The COO is also responsible for key programs affecting DXC's carbon footprint: DXC's data center optimization program and DXC's Virtual First program. Our innovative virtual-first business model will enable the majority of our colleagues to work from anywhere, reducing commutes and business travel while enabling better work-life balance. We expect this model to have a significant impact on our facility footprint and lower our carbon emissions in the coming years. Together, the virtual-first program and the data center and office optimization programs will yield long-term benefits that help us meet our climate-related objectives. The COO monitors the overall ESG environment and works with the executive leadership team to proactively adjust the strategy to minimize risks to DXC and DXC's stakeholders.

- b. Describe the process and frequency for senior executives or other employees to report back to the highest governance body on the management of the organization's impacts on the economy, environment, and people:** DXC enhanced the governance of the ESG program to include a multitiered process involving the Board of Directors, the global leadership team, the ESG Executive Steering Committee, and the ESG Working Group. Each of these governing bodies performs a critical role in ensuring that our approach incorporates broad perspectives to address our stakeholder needs while delivering on our commitment to sustainable business.

The DXC Board of Directors provides oversight of the ESG program, ensuring that we have the governance, long-term strategy and processes to manage ESG outcomes that meet the needs of stakeholders. Within the Board of Directors, the Nominating and Corporate Governance Committee has specific oversight of ESG. The COO regularly updates the committee on ESG status and provides an update to the full board annually.

The CEO drives the organization's overall business strategy, setting the tone and direction for all ESG matters, including climate-related objectives. The CEO has delegated the execution of DXC's ESG program to the COO, who is responsible for overseeing initiatives, programs, and policies related to the company's ESG and climate strategy. The COO is also responsible for related initiatives that have a significant impact on our overall carbon footprint and DXC's data center optimization program, as well as shifting our colleagues to a largely virtual business model, and advancing our circular economy engagement through optimization of IT asset refurbishment and recycling programs. Together, these programs will reduce DXC's GHG emissions, overall energy consumption, and dependence on daily work commutes and business travel.

DXC's global leadership team, which comprises members of the C-suite and regional business executives, ensures that ESG outcomes are aligned with stakeholder needs. The global leadership team is updated regularly on the broad ESG issues affecting the business. They provide input on the long-term strategy and drive initiatives in the various business areas they oversee.

For additional information, please see our [2021 TCFD report, pp.3–4](#).

Disclosure 2-14: Role of the Highest Governance Body in Sustainability Reporting

- a. Report whether the highest governance body is responsible for reviewing and approving the reported information, including the organization's material topics, and if so, describe the process for reviewing and approving the information:** DXC's global leadership team, which comprises members of the C-suite and regional business executives, ensures that ESG outcomes are aligned with stakeholder needs. The global leadership team is updated regularly on the broad ESG issues affecting the business. They provide input on the long-term strategy and drive initiatives in the various business areas they oversee.
- b. If the highest governance body is not responsible for reviewing and approving the reported information, including the organization's material topics, explain the reason for this:** Not applicable, the highest governance body is responsible for reviewing and approving the reported information.

Disclosure 2-15: Conflicts of Interest

- a. **Describe the processes for the highest governance body to ensure that conflicts of interest are prevented and mitigated:** DXC's Code of Conduct, company policy, and values require DXC directors, officers, executives, employees, and representatives to disclose all known, apparent, or potential conflicts of interest to DXC as they arise. Conflict disclosures must be notified to line management and Ethics & Compliance Office (ECO). Once they are disclosed, conflicts shall be evaluated and dispositioned in a timely manner.
- b. **Report whether conflicts of interest are disclosed to stakeholders:** Investigation case metrics are provided to the Board of Directors on a periodic basis, and when deemed necessary, conflicts of interest matters are disclosed.

Disclosure 2-16: Communication of Critical Concerns

- a. **Describe whether and how critical concerns are communicated to the highest governance body:** The Ethics & Compliance Office (ECO) reports on the activities and effectiveness of the E&C program to the Board of Directors and management. The ECO, under the authority of the chief E&C officer, is chartered by the Board of Directors to promote an organizational culture that encourages ethical conduct and a commitment to compliance with DXC's Code of Conduct, with internal company policies, and with the law, wherever DXC conducts business. The ECO is also chartered to exercise due diligence to prevent and detect criminal and unethical conduct and coordinate investigations of known or suspected criminal and unethical conduct globally through the promotion and utilization of DXC's OpenLine. OpenLine is available to all directors, officers/executives, managers, employees, and representatives of DXC around the world to report known or suspected violations of the Code of Conduct, internal policy, and the law and/or to seek ethical advice and guidance in addition to other means of communication, such as DXC's Speak-Up program.
- b. **Report the total number and nature of critical concerns that were communicated to the highest governance body during the reporting period:** DXC Technology is a publicly traded U.S. corporation. Any material incidents, investigations, proceedings, complaints or lawsuits have been notified, as required, to the U.S. SEC. Those filings are publicly available on the SEC website.

Disclosure 2-17: Collective Knowledge of the Highest Governance Body

- a. **Report measures taken to advance the collective knowledge, skills, and experience of the highest governance body on sustainable development:** The Board recognizes the importance of its members keeping current on DXC and industry issues and of their responsibilities as directors. All new directors attend orientation training soon after being elected to the Board. Also, the Board encourages attendance at continuing education programs, which may include internal strategy or topical meetings, third-party presentations, and externally offered programs.

The Board or one of its committees receives quarterly updates on the company's sustainability program, which includes environmental and social performance, risk management, ethics, and compliance and other matters of significance. (Source: [SEC filing 2021, p.23](#))

Disclosure 2-18: Evaluation of the Performance of the Highest Governance Body

- a. **Describe the processes for evaluating the performance of the highest governance body in overseeing the management of the organization's impacts on the economy, environment, and people:** We are committed to providing transparency about our Board and committee evaluation process. Our Board utilizes a multipart process for its ongoing self-evaluation to ensure that it is operating effectively and that its processes reflect best practices.
- Annual self-evaluations
 - External evaluator
 - Individual director assessments
- (Source: [SEC filing 2021](#), p.24)
- b. **Report whether the evaluations are independent and on the frequency of the evaluations:** Our Board evaluation process includes an external evaluator. In FY20, the evaluation was facilitated by an outside consultant with significant corporate governance experience. In this process, the outside consultant administered a survey and interviewed directors who provided input regarding the leadership, performance, and effectiveness of the Board and each committee on which they served. The outside consultant reviewed the results of its evaluation with the Nominating/Corporate Governance Committee and the full Board and made recommendations for improvements as appropriate.
- c. **Describe actions taken in response to the evaluations, including changes to the composition of the highest governance body and organizational practices:** The Nominating/Corporate Governance Committee periodically assesses the collective skills and experiences of our Board, comparing them to our long-term strategy. (Source: [SEC filing 2021](#), p.24)

Disclosure 2-19: Remuneration Policies

- a. **Describe the remuneration policies for members of the highest governance body and senior executives:** [2021 Proxy Statement / Executive Compensation / Compensation Discussion and Analysis \(pp.36–63\)](#)
- b. **Describe how the remuneration policies for members of the highest governance body and senior executives relate to their objectives and performance in relation to the management of the organization's impacts on the economy, environment, and people:**

Entitled to Incentive	Type of Incentive	Activity Incentivized	Comment
COO	Monetary reward	Other (please specify): corporate ESG performance	The success of DXC's ESG program, inclusive of climate-related performance, is one of many objectives against which the COO's performance is evaluated. Overall goal achievement is part of the evaluation process for DXC's annual compensation plan.
Facilities Manager	Monetary reward	Other (please specify): facilities maintenance and efficiency	Achievement of facilities-related goals and targets, which includes efficient management of DXC's global facilities footprint, is one of many objectives against which the facilities manager's performance is evaluated. Overall goal achievement is part of the evaluation process for DXC's annual compensation plan.
Other, Please Specify:	Monetary reward	Other (please specify):	Successful execution of DXC's ESG program, inclusive of climate-related performance, is one

Entitled to Incentive	Type of Incentive	Activity Incentivized	Comment
Global ESG program Lead		effective ESG program management	of many objectives against which the Global ESG program leader's performance is evaluated. Overall goal achievement is part of the evaluation process for DXC's annual compensation plan.
All Employees	Nonmonetary reward	Behavior change—related indicator	DXC's Virtual First program actively promotes employee autonomy for where employees work. Flexibility and increased remote work decrease commuting and business travel, reducing Scope 3 emissions.
Other, Please Specify: Account Executives (AEs)	Monetary reward	Other (please specify): sales associated with DXC's low-carbon products	AEs are rewarded for sales associated with DXC's low-carbon products, such as Cloud and Modern Workplace services.

Disclosure 2-20: Process to Determine Remuneration

- a. **Describe the process for designing its remuneration policies and for determining remuneration:** Please find this information here: [2021 Proxy Statement / Executive Compensation / Compensation Discussion and Analysis \(pp.36-63\)](#)
- b. **Report the results of votes of stakeholders (including shareholders) on remuneration policies and proposals, if applicable:** Please find this information here: [2021 Proxy Statement / Executive Compensation / Compensation Discussion and Analysis \(p.41\)](#)

Disclosure 2-21: Annual Total Compensation Ratio

- a. **Report the ratio of the annual total compensation for the organization's highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual):** Please find more information here: [2021 Proxy Statement / Executive Compensation / Compensation Discussion and Analysis \(p.78\)](#)
- b. **Report the ratio of the percentage increase in annual total compensation for the organization's highest-paid individual to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual):** Please find more information here: [2021 Proxy Statement / Executive Compensation / Compensation Discussion and Analysis \(p.78\)](#)
- c. **Report contextual information necessary to understand the data and how the data has been compiled:** Please find more information here: [2021 Proxy Statement / Executive Compensation / Compensation Discussion and Analysis \(p.78\)](#)

1.4 Strategy, Policies, and Practices

Disclosure 2-22: Statement on Sustainable Development Strategy

- a. **Report a statement from the highest governance body or most senior executive of the organization about the relevance of sustainable development to the organization and its strategy for contributing to sustainable development:** Please see our UN Global Compact Letter: <https://www.unglobalcompact.org/participation/report/cop/create-and-submit/active/454576>

Disclosure 2-23: Policy Commitments

- a. **Describe its policy commitments for responsible business conduct:** DXC's Code of Conduct is a reflection of our values and who we are as a company. As we deliver excellence to our customers and colleagues around the world, our ability to serve them depends on an uncompromising commitment to doing the right thing and acting with integrity. DXC intends our Code to apply equally to everyone working at, with, or on behalf of DXC. Our Code of Conduct and our values, together with policy, act as a guide to making good decisions and always conducting ourselves in a responsible manner, helping us to represent DXC with integrity: <https://dxc.com/au/en/about-us/leadership-and-governance/code-of-conduct>
- b. **Describe its specific policy commitment to respect human rights:** The Board of Directors of DXC is committed to the protection and advancement of human rights and ensuring that our operations in communities around the world function with integrity. This commitment is provided through the DXC Human Rights Statement: <https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Human-rights-statement.pdf>
- DXC is committed to minimizing the risk of all forms of forced labor and human trafficking within our global business and supply chain. DXC forbids any form of slavery, human trafficking, forced labor, or child labor, and we are committed to complying with applicable laws prohibiting such exploitation, as evidenced by the DXC Modern Slavery Statement: <https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Modern-slavery-statement.pdf>
- DXC's Code of Conduct includes our commitment to human rights through respect, inclusion, and diversity: <https://dxc.com/au/en/about-us/leadership-and-governance/code-of-conduct>
- c. **Provide links to the policy commitments if publicly available, or, if the policy commitments are not publicly available, explain the reason for this:** Please see the following statements for more information:
- Human Rights Statement - <https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Human-rights-statement.pdf>
- Modern Slavery Statement - <https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Modern-slavery-statement.pdf>
- Code of Conduct - <https://dxc.com/au/en/about-us/leadership-and-governance/code-of-conduct>
- d. **Report the level at which each of the policy commitments was approved within the organization, including whether this is the most senior level:** Approval for all aspects of our Code of Conduct is provided by the DXC Board of Directors. Any changes to the Code must be reviewed and approved by the Board. Our Modern Slavery Statement and Human Rights Statement are approved by our COO and our General Counsel. Substantive changes to either statements require a new review and approval process.
- e. **Report the extent to which the policy commitments apply to the organization's activities and to its business relationships:** Our global master services agreements and contracts include our Responsible Supply Chain Principles, which reference human rights and modern slavery/human trafficking. Our purchase order terms and conditions (POTAC) also include a

modern slavery/human trafficking clause as well as a Responsible Supply Chain Principles clause. The DXC Responsible Supply Chain Principles drive our commitment to fostering sustainable business practices across our global network. We are serious about our environmental, social, and financial responsibilities, and we strive to develop good relationships with suppliers who also take them seriously. The DXC Responsible Supply Chain Principles cover five main categories:

- Respecting the basic human rights of our people
- Enforcing labor standards and prohibiting child labor
- Prohibiting corruption and bribery
- Protecting the environment
- Fostering equality, diversity, and inclusion

Our suppliers are required to adhere to the DXC Responsible Supply Chain Principles.

- f. **Describe how the policy commitments are communicated to workers, business partners, and other relevant parties:** Each year, we strive to ensure that 100% of our in-scope DXC Technology population completes our Code of Conduct training, which is available in 17 languages. During FY21, this was conducted in November 2020, and 99% of DXC colleagues completed the training.

DXC also offers further training regarding supply chain transparency. This is offered online at DXC University to all employees. Other topics are also included in DXC University, and more than 117,000 DXC colleagues have completed training programs through DXC University.

Disclosure 2-24: Embedding Policy Commitments

- a. **Describe how it embeds each of its policy commitments for responsible business conduct throughout its activities and business relationships:** DXC has established the DXC Responsible Supply Chain Principles. These principles speak to the commitments we make to our customers and our business relationships built on trust and personal responsibility. They establish the standards required for conducting business with DXC. DXC's own Human Rights Statement was developed in accordance with the tenets of the United Nations (UN) Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the UN Universal Declaration of Human Rights: <https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Supply-chain-principles.pdf>

The DXC ECO conducts Ethics & Compliance-related training to all employees around the globe, with a completion rate of 99% in FY21. All new hires are required to take the training within 30 days of onboarding.

Disclosure 2-25: Processes to Remediate Negative Impacts

- a. **Describe its commitments to provide for or cooperate in the remediation of negative impacts that the organization identifies it has caused or contributed to:** We are committed to operating in a manner that protects the environment and the health and safety of our employees, contractors, and customers and the communities in which we conduct business. DXC will meet or exceed all applicable compliance obligations (voluntary and mandatory), customer commitments, and other requirements to which DXC subscribes. This includes corporate reporting under recognized industry initiatives, as evidenced by our environmental health and safety (EHS) policy: <https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Environment-health-and-safety-EHS-policy.pdf>
- b. **Describe its approach to identify and address grievances, including the grievance mechanisms that the organization has established or participates in:**

Privacy - DXC is committed to resolving any complaints or disputes in relation to customer privacy and DXC's collection and use of personal information. DXC's global Privacy and Data

Protection Office (PDPO) is the single point of contact for addressing privacy-related matters assigned or reported to it by DXC employees at all organizational levels, customers, partners, and external providers, vendors, and subcontractors. Customers and individuals might also reach out to their national privacy authorities to ask for their support. DXC is committed to coordinating and collaborating with foreign regulators, including EU member state privacy authorities.

ESG - We also make a clear statement of our support of the UN Global Compact to our stakeholders and the general public through our ESG platform, in our annual report, and in other public documents.

Confidential assistance - DXC's SpeakUp! program provides various channels for employees and representatives to ask questions and submit concerns. Such reports may be made openly, confidentially, and/or anonymously, as allowable by law. DXC's OpenLine advice and reporting channel is always available, confidential, anonymous, toll-free, and web enabled.

- c. **Describe other processes by which the organization provides for or cooperates in the remediation of negative impacts that it identifies it has caused or contributed to:** DXC has reaffirmed its commitment to the Ten Principles of the Global Compact on human rights, labor standards, protection of the environment, and anticorruption. DXC is focused on delivering excellence for our customers and our colleagues, and we are committed to improving the communities in which we live and work. We express our ongoing support to advance the Ten Principles within our company and all those we influence.

Confidentiality, anonymity, and DXC's stance on retaliation: We know there may be some reluctance to ask questions or report misconduct. For this reason, we offer multiple channels to increase comfort with asking questions or reporting misconduct. In some cases and in many countries, a report can be made anonymously. Also, in our efforts to resolve reported issues, DXC controls access to reported information, allowing its distribution to only those who need it to properly investigate misconduct. DXC expressly forbids retaliation, direct or indirect, against any employee who in good faith reports misconduct or participates in a company investigation of misconduct. DXC is committed to conducting a fair and thorough review of all actionable concerns, to maintaining employee confidence and confidentiality to the extent the law permits, and to protecting employee personal data, as appropriate and in accordance with DXC's Privacy Policy and the OpenLine Notice.

- d. **Describe how the stakeholders who are the intended users of the grievance mechanisms are involved in the design, review, operation, and improvement of these mechanisms:** DXC strives for continuous improvement in our support programs, processes, and communications. Our DXC intranet contains numerous contacts for a variety of inquiries where suggestions, issues, or concerns can be addressed:

The DXC HR organization conducts periodic employee surveys to measure the pulse of the employee workforce in all our operations worldwide.

For COVID-19-related inquiries, there is a COVID-19 Command Center DXC Response Operations Center (D-ROC) hotline #1-443-569-0886.

For confidential assistance, the Employee Assistance Program, ECO SpeakUp@dxc.com, and OpenLine (please see **2-26-a**) are available on the DXC home page. Also available is the DXC simplification site, which solicits process improvement suggestions, at simplification@dxc.com on the DXC Intranet.

- e. **Describe how the organization tracks the effectiveness of the grievance mechanisms and other remediation processes, and report examples of their effectiveness, including stakeholder feedback:** DXC conducts various benchmarking studies by tracking data points related to employee survey feedback, ECO investigations (which leads to targeted training activities), customer surveys, and partner surveys. This allows for trend analysis as it relates to a variety of grievances. Input is continually solicited as to the grievance mechanism's accessibility and ease of use.

Disclosure 2-26: Mechanisms for Seeking Advice and Raising Concerns

- a. **Describe the mechanisms for individuals to:**
- i. **seek advice on implementing the organization's policies and practices for responsible business conduct**
 - ii. **raise concerns about the organization's business conduct**

DXC maintains a worldwide toll-free and internet-based helpline called DXC OpenLine that directors, officers, executives, managers, employees, representatives of DXC, our subsidiaries, and any outside individuals or entities can use to communicate ethics-related concerns or seek advice about suspected unethical or unlawful behaviors. The DXC OpenLine is a confidential, multilingual, always-available advice and reporting channel that can be used anonymously if preferred, as allowable by law. ECO, under the authority of DXC's chief ethics and compliance officer, is chartered by the Board of Directors to operate and publicize this capability to all DXC representatives around the world to report known or suspected violations of the DXC Code of Conduct, for internal policy and the law, or to seek ethical advice and guidance. All employees and representatives of DXC are strongly encouraged to report known or suspected violations of the Code of Conduct, DXC policy, or any law in any DXC jurisdiction to:

- Their manager, "skip-level" manager, or any other individual in their management chain
- HR or legal department
- E&C
- OpenLine
- Internal audit
- SpeakUp campaign, which is another means of seeking help with any issues, concerns, or observed misconduct needing to be addressed (SpeakUp@dxc.com)

Disclosure 2-27: Compliance with Laws and Regulations

- a. **Report the total number of significant instances of noncompliance with laws and regulations during the reporting period, and a breakdown of this total by:**

- i. instances for which fines were incurred
- ii. instances for which nonmonetary sanctions were incurred

In FY21, DXC Technology did not experience any significant instance of noncompliance with laws and regulations. No fines were incurred, and no nonmonetary sanctions were incurred.

- b. **Report the total number and the monetary value of fines for instances of noncompliance with laws and regulations that were paid during the reporting period, and a breakdown of this total by:**

- i. fines for instances of noncompliance with laws and regulations that occurred in the current reporting period: Not applicable
- ii. fines for instances of noncompliance with laws and regulations that occurred in previous reporting periods: Not applicable

- c. **Describe the significant instances of noncompliance:** Not applicable
- d. **Describe how it has determined significant instances of noncompliance:** Not applicable

Disclosure 2-28: Membership Associations

a. Report industry associations, other membership associations, and national or international advocacy organizations in which it plays a significant role:

DXC maintains memberships with or otherwise engages with these organizations:

DXC Global

- Signatory of Cybersecurity Tech Accord
- Signatory of UN Global Compact Network Inc.

DXC Americas

- Disability:IN (formerly the U.S. Business Leadership Network)

DXC Australia/New Zealand

- Committee for Economic Development of Australia (CEDA)
- Australian Information Industry Association (AIIA)
- Trans Tasman Business Circle
 - American Chamber of Commerce (AmCham) in Australia
 - Business Council of Australia (BCA)
- Diversity Council of Australia
- Supply Nation
- Australian Network on Disability
- **DXC Dandelion Program**
 - Autism Australia
 - Autism NZ
 - Autism SA
 - Autism WA
 - Autism Queensland
- **DXC First Nations Program**
 - Kinaway
 - Reconciliation Australia
- **Veterans**
 - Platinum partner, Solider On
 - Signed the pledge with AmCham's "Get a vet a go" program
 - Signed on for the Prime Ministers Veteran Employment Program
 - Signed the Fortem First Responders Pledge

DXC Belgium

- Agoria
- Plug and Play Maritime

DXC France

- Numeum (new name of Syntec)
- Programme Fitec (professional reconversion towards digital professions)
- Hello Handicap (DXC France is part of TA online events twice a year – only for candidates with disabilities)
- Groupe NEA (outsourcing of services by people with disabilities)
- LCMH Group (outsourcing of services by people with disabilities)
- Agefiph: <https://www.agefiph.fr/>

DXC Germany

- Initiative D21 e.V.

DXC Hungary

- The John von Neumann Computer Society

DXC Italy

- Coder Dojo Association (DXC Italy)
- Anitec Assinform Italy
- Member of Confindustria
- Founding member of the Confindustria Digitale Federation
- Ambrosetti
- CEOforLife

DXC Netherlands

- NL Digital
- FME

DXC Poland

- Association of Business Service Leaders (ABSL)
- CionetPolska
- Polska Izba Informatyki (PIT)
- Czublun&Trębicki
- Bird&Bird
- UnitedLEX
- Husarski Michalski Tax Consultancy

DXC Romania

- ABSL

DXC Serbia

- AmCham in Serbia
- Chamber of Commerce of Serbia

DXC Slovakia

- Slovak Compliance Circle
- Partnerstvá pre Prosperitu (PPP)
- AmCham - Slovakia
- Moving Board Slovakia S R O
- Bird&Bird

DXC Spain and Portugal

- Club de Calidad
- Fundación Alares
- Fundación ONCE
- Fundación Adecco
- Fundación DKV Integralia
- Asociación de Usuarios de SAP España (AUSAPE)
- Asociación Española de Usuarios de Telecomunicaciones y de la Sociedad de la Información (AUTELSI)
- Asociación Española de Empresas de Consultoría (AEC)
- Asociación Para el Progreso de la Dirección (APD)

- AmCham in Portugal
- Portugal Global Enabling Sustainability Initiative

DXC Sweden

- Jobspranget
- The Stockholm Climate Pact
- The Stockholm Integration Pact

DXC Switzerland

- AmCham in Switzerland
- Swiss IT Intelligence Communities (SITIC)
- Swico
- National Chamber

DXC United Kingdom

- Employers Network for Equality and Inclusion (ENEI) (United Kingdom & Ireland [UKI])
- National Union of Journalists

1.5 Stakeholder Engagement

Disclosure 2-29: Approach to Stakeholder Engagement

- a. Describe its approach to engaging with stakeholders:** DXC Technology has undertaken a process to identify our key stakeholders, including those who are invested in the organization as well as those who have other relationships with DXC. We have considered the reasonable expectations and interests of stakeholders when reporting against our significant economic, environmental, and social impacts. Stakeholders who are likely to use the ESG website materials and reports include shareholders/investors, customers and business partners, employees, suppliers, media, governments and regulators, academic communities, socially responsible investment analysts, change request (CR) professionals, and nongovernmental organizations (NGOs).

DXC Technology recognizes that engaging with external and internal stakeholders is an essential part of responsible business practice, helping us to define our sustainability strategy, share our progress, and improve our reporting. We do so in a variety of ways, including annual customer surveys, collaboration websites, committee memberships, and face-to-face dialogue. We regularly engage with a number of our key stakeholders through a series of in-depth interviews to review and inform our decision making around our issues matrix and participate in a wider discussion to understand the key sustainability issues faced by our customers and partners going forward. Their valuable insights continuously help us to clarify the content of our reporting and the goals and metrics against which we are reporting.

Finally, the launch of the UN 17 Sustainable Development Goals (SDGs) is a significant incentive for businesses to support global cooperation toward developing a more sustainable world. As a global company, we have identified six SDGs (No. 3, 4, 7, 8, 12, 13) that are closely aligned with our business and internal or community programs. In various countries where we operate, DXC contributes to additional goals that are not currently reported. We will continue to develop our actions to align further our business with other SDGs.

DXC also partners with customers to help them achieve their own climate-related goals. In response to shifting customer demand, we offer a number of products and services that can have a significant impact on our customers' sustainability objectives, delivering climate-related benefits that are far greater than what we could achieve alone through our internal carbon-reduction efforts. Offerings such as DXC Modern Workplace, cloud migration services, and data-driven sustainability services directly reduce carbon emissions for our customers. Focusing on our

customers, colleagues, partners, and communities is critical to meeting our commitment to sustainable and responsible business practices that contribute to a better world.

Disclosure 2-30: Collective Bargaining Agreements

- a. **Report the percentage of total employees covered by collective bargaining agreements (CBAs):** We do not report on the percentage of employees who are covered by CBAs (or who are covered by other forms of employee representation).
- b. **For employees not covered by CBAs, report whether the organization determines their working conditions and terms of employment based on CBAs that cover its other employees or based on CBAs from other organizations:** Working conditions for employees who are not covered by CBAs will be based on individual negotiations and the local legal framework.

2 GRI 200: GRI Economic Topics

2.1 GRI 201: Economic Performance

Disclosure 201-1: Direct Economic Value Generated and Distributed

See (https://s27.q4cdn.com/120381974/files/doc_financials/2021/ar/DXC-AnnualReport-2021.pdf)

Disclosure 201-2: Financial Implications and Other Risks and Opportunities Caused by Climate Change

The impacts of climate change have emerged as a primary topic of interest for capital markets and global stakeholders alike. We recognize the need to measure, interpret, and analyze climate risks and opportunities to inform our efforts to combat environmental degradation, both internally and for our customers. DXC is committed to reporting annually on our global footprint and the practices we have implemented to positively impact our operating environment. Our efforts are guided by the TCFD and other leading ESG frameworks, such as the GRI, the Sustainability Accounting Standards Board (SASB), and CDP (formerly the Carbon Disclosure Project).

DXC's global Enterprise Risk Management (ERM) program sets the standards, work program, and practices for holistic, standardized, company-wide ERM. The ERM program provides a framework for identifying, assessing, and managing risk within acceptable levels to achieve the organization's strategy and objectives. Climate-related risks are identified, rated, and reviewed alongside other risks identified during the enterprise risk assessment process. In line with our ERM program, we define risk time horizons as follows: short term, 0-2 years; medium term, 2-5 years; and long term, 5-15 years.

Current climate risk to the company is recognized in both short-term and long-term time horizons. Climate risk assessments are updated every 6 months. These updates help us identify changes in risks and methods for preventing or reducing their effects on DXC facilities, operations, and business objectives. After identification, risks are evaluated based on their likelihood of occurrence and their potential impact. Risks are rated on a scale of 1 to 5 (5 being the most severe or having the highest likelihood of occurrence) according to the following definitions:

1. Insignificant impact (>\$5 million), or chance of occurrence is rare (<1%)
2. Minor impact (\$5 million-\$20 million), or chance of occurrence is remote (2%-10%)
3. Significant impact (\$20 million-\$50 million), or chance of occurrence is moderate (11%-50%)
4. Major impact (\$50 million-\$100 million), or chance of occurrence is likely (51%-90%)
5. Critical impact (>\$100 million), or chance of occurrence is frequent (91+%)

Risks that are determined by the global leadership team to meet the threshold of enterprise level impact are reported to the Board of Directors. Mitigation plans, including key performance indicators and key risk indicators, are developed and monitored for each enterprise-level risk.

Risks and Opportunities caused by climate change are summarized below:

Timing	Risks	Opportunities
Short Term (0-2 Years)	<ul style="list-style-type: none"> Regulatory compliance Increasing energy costs and weather disruptions 	<ul style="list-style-type: none"> Virtual-first business model Data center optimization Supply chain management of S3 emissions
Medium Term (2-5 Years)	<ul style="list-style-type: none"> Introduction of carbon tax Achieving climate goals 	<ul style="list-style-type: none"> Expansion of sustainable offerings

Timing	Risks	Opportunities
	<ul style="list-style-type: none"> Lack of competitive sustainable offerings 	<ul style="list-style-type: none"> Development of innovative technologies
Long Term (5-15 Years)	<ul style="list-style-type: none"> Achieving carbon-neutral business model 	

For additional details, please see our [TCFD report](#).

Disclosure 201-3: Defined Benefit Plan Obligations and Other Retirement Plans

This information varies by country. For information on overall costs, obligations, and assets related to DXC Technology's Defined Benefit Plans, see Note 15 - Pension and Other Benefit Plans of [DXC Technology's annual report](#).

Disclosure 201-4: Financial Assistance Received from the Government

We are currently the beneficiary of state and local incentives in New Orleans, LA related to our Digital Transformation Center located there; these incentives expire in various fiscal years through 2028. DXC Technology participated in COVID-19 pandemic-related tax deferrals for the U.S. Federal Insurance Contributions Act (FICA) payroll tax and UK value-added tax (VAT). Deferred taxes are scheduled for remittance based on the applicable deferral guidelines. For information on the tax deferrals, see DXC Technology's annual report "Contractual Obligations."

2.2 GRI 204: Procurement Practices

Management Approach Disclosures for Procurement Practices

DXC Technology's suppliers form an integral part of our sustainability strategy which is why the [DXC Responsible Supply Chain Principles](#) were established. The principles cover five main categories: human rights, labor conditions, anticorruption concerns, environmental protection, and diversity, equality and inclusion. These principles speak to the commitments we make to our customers and the relationships we build, based on trust and personal responsibility. They establish the standards required for conducting business with DXC.

Accordingly, our goal is to work with our suppliers to ensure full compliance with these principles as they in turn apply them to their own suppliers with whom they work to deliver goods and services for DXC. We will consider these principles in our selection of suppliers, and DXC reserves the right to monitor supplier processes and procedures against these principles as part of DXC's ongoing Responsible Supply Chain program.

Today, governments worldwide are challenged by increased citizen demand for service, combined with pressure to do more with less and to use electronic government channels to speed the delivery of services. These drivers — along with the growing need for government departments to function more securely and effectively — shape the reality facing governments at all levels. DXC's primary objective is to enable governments to focus on their core missions and become more agile. This goal frequently is achieved in collaboration with small businesses.

DXC engages small businesses not only as a government contracting requirement but also in the spirit of good citizenship and growing the global economy. The result is a win-win situation for all involved that adds value to our government customers with innovative solutions.

Disclosure 204-1 Proportion of Spending on Local Suppliers

DXC procures goods and services from suppliers located in more than 70 countries. We have sourcing strategies that incorporate a combination of global, regional, and local suppliers to meet the needs of our customers in the most effective manner. As such, we do not have a particular preference for local suppliers but look at our entire business needs to optimize supplier selection. Our supply chain mirrors our employee and customer base: global, diverse, and inclusive. DXC engages small businesses in the spirit of good citizenship and growing the global economy.

2.3 GRI 205: Anticorruption

Management Approach Disclosures for Anti-Corruption

DXC Technology has an anticorruption program that includes continuous risk assessment activities to identify corruption risks and risk mitigation activities. DXC uses various factors in our risk assessment, including Corruption Perceptions Index (CPI) scores, size of the business, the number of third parties, the type of business, and the number of public sector customers. DXC's Code of Conduct, company policy, and company values require DXC directors, officers, executives, employees, and representatives to disclose all known, apparent, or potential conflicts of interest to DXC as they arise. Conflict disclosures must be notified to line management and the ECO. Once they are disclosed, conflicts shall be evaluated and dispositioned in a timely manner. Agreements to eliminate, avoid, or otherwise mitigate conflicts of interest shall be well documented. Conflicts of interest are included in the DXC Code of Conduct and Code of Conduct training, and anticorruption training is included as part of this training that is required of employees. Additional training in anticorruption is given to various employees and business partners in high-risk regions or holding certain roles within the organization. This additional targeted training is given throughout the year as needed. DXC participates in various collective action activities, including policies and procedures on anticorruption, "Tone at the Top" messaging from senior management, a third-party due diligence program, various online training opportunities on anticorruption issues, and ongoing audit and monitoring activities to address our highest risks.

Our Conduct Policy on Antibribery/Anticorruption states that we will compete fairly for business solely on the merits of its competitive offerings. Employees are prohibited from bribing anyone to obtain, retain, or direct business, or to secure any other improper advantage. Neither DXC nor any of its associated persons, commercial intermediaries, or other third parties will make or be a party to any improper payments. Third-party commercial intermediaries will be engaged only with a written agreement and only after a satisfactory evaluation of a comprehensive, risk-based, independent due diligence inquiry regarding business integrity. DXC policy requires that all business development gift and/or hospitality expenditures be recorded accurately and completely in DXC's books and records, where no false, misleading, incomplete, inaccurate, or artificial entries are to be knowingly made for any reason.

Disclosure 205-1: Operations Assessed for Risks Related to Corruption

DXC takes practical actions to assess risk in our operations, including risks related to corruption. DXC's Code of Conduct, company policy, and our company values require DXC directors, officers, executives, employees, and representatives to disclose all known, apparent, or potential conflicts of interest to DXC as they arise. Conflict disclosures must be notified to line management and the ECO. Once they are disclosed, conflicts shall be evaluated and dispositioned in a timely manner. Agreements to eliminate, avoid, or otherwise mitigate conflicts of interest shall be well documented. DXC competes vigorously and fairly for business solely on the merits of its competitive offerings. DXC shall not offer, promise, give, or accept money or anything of value to or from government officials, political parties, or commercial-sector parties to improperly obtain or retain business, secure an improper advantage, or otherwise influence improper action. DXC complies with the U.S. Foreign Corrupt Practices Act (FCPA) and the United Kingdom Bribery Act (UKBA). Beyond the transnational reach of the FCPA and UKBA, DXC also abides by the local anticorruption statutes of other nations, almost all of which have some form of antibribery law to prohibit improper payments to government officials of any payment amount. DXC maintains policies and process controls for risk areas such as business amenities and contributions, use of third-parties, facilitation payments, and money laundering.

Disclosure 205-2: Communication and Training About Anticorruption Policies and Procedures

All new DXC employees are required to complete the Code of Conduct training. The Code of Conduct training was launched in November 2020 (DXC FY21).

Disclosure 205-3: Confirmed Incidents of Corruption and Actions Taken

It is the policy of DXC to not share internal information on internal risk assessments, policy documents, communications, or internal investigations. DXC has a Code of Conduct available for public viewing at <https://dxc.com/au/en/about-us/leadership-and-governance/code-of-conduct>.

In addition, DXC's policy on anticorruption is as follows: DXC has zero tolerance for bribery, kickbacks, and other improper payments. We are committed to succeeding on the merits of our competitive offerings and the value we bring to customers. For this reason, we do not make or take bribes or kickbacks to or from anyone to obtain, retain, or direct business or to secure any other business advantage — nor does the company permit any other person or entity to do so on our behalf — at any time, in any public or private sector market, or in any circumstance.

2.4 GRI 206: Anticompetitive Behavior

Management Approach Disclosures for Anti-Competitive Behaviour

As a large multinational corporation doing business in more than 70 countries, from time to time, DXC might be involved in various legal proceedings in the ordinary course of business. As a publicly traded company, we disclose any significant legal matters affecting the company in our corporate filings. During the reporting period for FY21, DXC did not have any legal actions regarding anticompetitive behavior or violations of antitrust and monopoly legislation in which the organization has been identified as a participant. We have an Anti-Trust & Competition Compliance policy covering anticompetitive behavior, antitrust and monopoly practices. We are committed to the principles of fair competition and the regulation of activities that would violate longstanding antitrust protections. As such, our policy requires compliance with the laws governing economic regulation and the preservation of a competitive and free enterprise system.

Disclosure 206-1: Legal Actions for Anticompetitive Behavior, Antitrust, and Monopoly Practices

Number of legal actions pending or completed during the reporting period regarding anticompetitive behavior and violations of antitrust and monopoly: Zero

Main outcomes of completed legal actions, including any decisions or judgments: None

2.5 GRI 207: Tax 2019

Management Approach Disclosures for Tax

For information on how DXC manages tax please see our [Annual Report](#) (pp.110-118).

Disclosure 207-1: Approach to Tax

As a multinational corporation doing business in over 70 countries, our approach to tax includes our commitment to being compliant with the large number and oftentimes complex and everchanging tax rules and reporting requirements while maintaining a tax-efficient profile in a manner that also contributes to the communities in which we operate. We utilize a combination of in-house and external resources based in several countries to operate our tax function.

Disclosure 207-2: Tax Governance, Control, and Risk Management

DXC Technology assesses tax risk based upon both local country and U.S. tax reporting and accounting standards (e.g., ASC740, ASC450, International Financial Reporting Standards [IFRS], Organization for

Economic Co-operation and Development [OECD]) and various guidelines proscribed by various government or regulatory agencies for internal controls (e.g., Sarbanes Oxley [SOX], Committee of Sponsoring Organization [COSO] framework, or similar local country guidelines), including testing of controls and reporting through our internal audit and SOX functions.

For detailed information on DXC Technology's policies and provision for income taxes, see Note 1, "Summary of Significant Accounting Policies," and Note 13, "Income Taxes of the Consolidated Financial Statements" contained in DXC Technology's annual report.

For detailed information on management's assessment of internal controls, see Item 9a, "Controls and Procedures" in DXC Technology's annual report.

Disclosure 207-3: Stakeholder Engagement and Management Concerns Related to Tax

Management concerns related to tax include the U.S. tax legislation imposing a one-time transition tax (or "repatriation tax"), difficulties associated with repatriating earnings generated or held abroad in a tax-efficient manner, and continual changes in tax laws.

For additional details on these items, see Item 1A, "Risk Factors" of DXC Technology's annual report.

Disclosure 207-4: Country-by-Country Reporting

We comply with U.S. and OECD guidelines for reporting financial, economic, and tax-related information in the jurisdictions in which we operate.

3 GRI 300: GRI Environmental Topics

Management Approach Disclosures for Energy and Emissions

As a globally leading IT services company, DXC Technology's most important environmental impacts relate to energy consumption and the associated GHG emissions together with the management of electronic assets. Inspired by the UN SDGs and other international frameworks, DXC is committed to responsible consumption and production as well as acting to reduce our climate change impacts (SDGs 7, 12, and 13). We also recognize our opportunity to help our customers increase efficiency and reduce their environmental impacts with next-generation solutions such as cloud computing, desktop virtualization, and data center management. Increasingly, potential customers are interested in our environmental credentials and issue questionnaires asking us to report on specific aspects of our performance. In addition, mitigating against increases in utility prices, carbon taxation, and energy security of supply concerns strengthens the business case for environmental management. Conflict minerals, increasing prices for components, and customer demands for circular economic practices are having a similar effect to reduce electronic waste.

DXC Technology has a global environmental strategy that is addressing these areas. In accordance with the Greenhouse Gas Protocol, a target base year of FY19 was developed to allow DXC to report and demonstrate the environmental improvements that are being delivered. DXC has prepared a 3-year environmental plan (FY19 – FY22) that set out targets, responsibilities, resources, progress, and actions for the period. The scope of our targets is our global operations:

- 20% absolute GHG emissions reduction (metric ton carbon dioxide equivalent [tCO₂e]) (target base year 2019)
- 12% absolute energy reduction (megawatt-hour [MWh]) (target base year 2019)
- Zero IT asset disposition (ITAD) to landfill (percentage)
- 30% renewable electricity purchased or generated (megawatt-hours [MWh]) (target base year 2019)
- 15% absolute reduction in water consumption (megaliters [ML]) (target base year 2019)
- 15% absolute reduction in waste generated (metric tons [t]) (target base year 2019)

Senior regional executives drive global environmental priorities in their areas. Regional environmental specialists and coordinators support the global ESG team in the day-to-day delivery of the strategy. Please note that all reported environmental data is FY21 data (April 2020-March 2021).

3.1 GRI 301: Materials

Management Approach Disclosures for Materials – ITAD

Through the services that we provide, the main resources and waste impacts of the services will arise from the procurement, delivery, use and disposal of IT assets used primarily at offsite locations. Although DXC is considered a technology service provider, hardware and infrastructure products will be procured and used as part of the services, composed mostly of desktop computers, laptop computers, printers, monitors, and servers. A circular economy approach applies to the reuse of equipment, scalability of the solutions, and flexibility of the service, helping to reduce waste and IT equipment at end of life for our customers and for DXC. Therefore, DXC has a duty of care to ensure that the waste hierarchy is maintained. As part of DXC's Environmental Plan, a target for zero electronic waste (e-waste) to landfill has been set, with a focus on the waste hierarchy. After refurbishment, the products are reused either by repackaging and putting them into "customer-owned" stock for call off as required, selling them through popular auction websites or IT brokers, or donating them to charity. Through this approach, we are ensuring that IT equipment is reused for a second life.

A three-stage process is employed:

- Promote refurbishment and redeployment of equipment where items meet the required specifications, extending their life
- Where items are below the required specifications, items will be sold on the market
- If the above-listed options are not feasible, only then will equipment be broken down and recycled.

Our contractors provide innovative go-to-market solutions to implement a reverse supply chain and to ensure the secure and environmentally compliant disposition of DXC's retired IT assets as well as the assets of DXC's customers.

We use multiple global contractors to manage the collection and recycling of e-waste arising. They report that 35% of materials are recycled, 65% of the materials are resold, and less than 1% undergoes disposal. As part of our social value program, we also send refurbished hardware to schools and charities around the world. Because of the recurrent lockdowns in 2020, the closure of schools in the United Kingdom brought to light the reality of how many children across the country do not have access to a laptop computer, desktop computer, or tablet at home to support them in their home learning. We partnered with BAE Systems to refurbish, cleanse, and rebuild used laptops, with a target of 1,000 laptops donated to schoolchildren across the United Kingdom. For this partnership, DXC was awarded Outstanding Team Achievement from BAE at the Global Procurement Awards in 2021.

Disclosure 301-1: Materials Used by Weight or Volume, and Disclosure 301-2: Recycled Input Materials Used

Although we do not manufacture materials that are used to produce or package our primary products and services, we take our role as a responsible corporate citizen within our value chain seriously. Our current target is 0% ITAD to landfill. We focus on extending the life cycle of the hardware we use and strive to extend the life of our assets, ensuring an improved overall use of the materials; this feeds into our circular economy approach and aligns with the UN SDG 12 (responsible consumption and production). We continually strive to influence other organizations with low-carbon products.

Disclosure 301-3: Reclaimed Products and Their Packaging

Percentage of Reclaimed Products and Their Packaging Materials for Each Product Category

The following table reflects IT assets that we own or provide as part of the services delivered to customers, along with the percentage of assets from data center services or workplace services. Items are primarily identified for resale, meaning they are refurbished and sold for a secondary use. In FY21, less than 1% of materials were sent to landfill.

Disposition	Data Center Assets	Workplace Assets
Total	100%	100%
Resale	38%	86%
Recycle	62%	14%
Disposal	<1%	<1%

- a. **How the data for this disclosure has been collected:** Data has been collated from our ITAD providers for materials that are at the end of their operational life. The data has been validated and confirmed by asset category through a third party.

3.2 GRI 302: Energy

Management Approach Disclosures for Energy

DXC Technology recognizes the contribution that energy consumption by nonrenewable sources makes to climate change. We also understand that our customers are part of the international efforts to prevent climate change. Therefore, the actions that we take will also benefit them. We align our approach to the latest standards and are inspired by the SDGs, of which Goal 12, “Ensure sustainable consumption and production patterns,” and Goal 13, “Take urgent action to combat climate change and its impacts,” are particularly relevant. DXC set a 12% reduction target for energy consumption by FY22, against the target base year FY19. We exceeded this target in FY21, with an absolute reduction of 24.28% electricity consumption and an absolute reduction of 26.14% across all energy consumption. Practical actions taken to reduce energy across our data center portfolio include the following:

- Procuring certified renewable electricity for all UK data centers
- Ensuring that global strategic data centers are certified to the ISO 50001 energy management system
- Efficiently managing the cooling distribution required for large-scale IT operations in accordance with ASHRAE TC 9.9 Thermal Guidelines for Data Processing Environments
- Monitoring consistent power usage effectiveness trending across the global data center portfolio
- Regularly conducting global management reviews with data center management teams and facilities management contractors to ensure implementation of best practices in energy and airflow management

As we continuously assess our global data center and facilities operations, we expect to achieve further significant reductions in energy and carbon emissions. Practical actions taken to reduce energy across DXC’s office portfolio include the following:

- Promoting DXC’s Virtual First program, which actively encourages employee autonomy over where they work, and enables reduction of our facilities footprint.
- Properly scheduling and fitting cooling/lighting to building occupancy
- Managing small IT spaces/server rooms in accordance with ASHRAE TC 9.9 Thermal Guidelines for Data Processing Environments
- Leveraging utility incentive and rebate programs to reduce the cost of infrastructure improvements
- Engaging employees through hub facility energy competitions within ISO14001 certified locations

Flexibility and increased remote work decreases commuting and business travel, thereby reducing Scope 3 emissions. In addition, our strategic office portfolio will look to operate from environmentally accredited facilities where positive measures to reduce energy and environmental impacts have been taken. Together, these programs will reduce DXC’s GHG emissions and overall energy consumption as well as the dependence on employee daily work commutes and business travel in the short and medium terms.

DXC is subject to various federal, state, local, and foreign government requirements relating to the protection of the environment, and various countries and regions down to the city level are increasing taxes and mandating regulations around fuel and energy. New legislation or regulations might result in increased costs directly relating to our compliance, an aspect that is particularly relevant to DXC as energy costs contribute a large proportion of data center operational costs, and many customer deliverable services, in turn, are based on data center operations. For example, the Energy Efficiency Directive (2012/27/EU) establishes a set of binding measures to help the EU reach its future energy targets. Under the directive, all EU countries are required to use energy more efficiently at all stages of the energy chain, from its production to its final consumption. Moreover, Article 8 stipulates how large companies will make audits of their energy consumption to help them identify ways to reduce it. The outputs of these audits are recommended cost-effective actions that will reduce energy usage. For DXC, such actions have included improving the setpoint temperatures and air management control of the

server room. Standard office-based recommendations include upgrading conventional lighting to light-emitting diodes (LEDs) and providing energy management training and awareness programs.

To manage energy-related risks to the business, we have combined DXC's energy efficiency, environmental management system, and annual reporting and compliance activities into a comprehensive ESG program. Our risk management process includes monitoring and reporting on our carbon footprint and using that data to inform how we reduce our energy consumption – all in line with global targets and in compliance with regulations. Noncompliance is a consistent short-term risk but managing it effectively through our ESG program significantly reduces the residual risk to the business. The risk of new taxation cannot be alleviated, but its impact is managed through DXC's ongoing energy reduction initiatives.

Disclosure 302-1: Energy Consumption Within the Organization

a. Total FY21 fuel consumption within DXC from non-renewable sources, in joules or multiples, including fuel types used:

	MWh	GJ
Natural gas	83,745	301,483
Gas Oil	10,894	39,219
Liquid Petroleum Gas (LPG) and Kerosene	315	1,134
Purchased Electricity	907,865	3,268,315
Purchased Heating/Cooling	8,288	29,838
Total	1,011,108	3,639,989

b. Total FY21 fuel consumption within DXC from renewable sources, in joules or multiples, including fuel types used:

	MWh	GJ
Self-Generated Onsite Electricity	1,259	4,531
Purchased Renewable Electricity	453,702	1,633,327
Total	454,961	1,637,858

c. Total joules, watt-hours, or multiples:

	MWh	GJ
Electricity Consumption	1,362,826	4,906,174
Heating, Cooling, and Steam Consumption	8,288	29,838

d. Total joules, watt-hours, or multiples:

	MWh	GJ
Electricity Sold	0	0
Heating Sold	0	0
Cooling Sold	0	0
Steam Sold	0	0

e. Total energy consumption within DXC, in joules or multiples: 1,466,069 MWh/5,277,848 GJ**f. Standards, methodologies, assumptions, and/or calculation tools used:**

We align our methodology to ISO 14064-3:2016 and the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition). Sites over which we have operational control and that are larger than 2,000 square feet in size are within the scope of reporting. Data is based on meter readings, supplier invoices, and supply logs wherever possible. If these are not available, we estimate based on the most recent actual figures. If no actual energy consumption information is available for a site, we make an estimate based on its size and operation, recognizing that offices and data centers have different consumption patterns.

g. Source of the conversion factors used:

We used the UK Government factors available at <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2020> for conversion.

To convert natural gas:

- For cubic feet to kilowatt hour, multiply by 0.311 (= 0.011 kWh/L × 28.32 L/ft³)
- For megajoules to kilowatt hour, multiply by 0.278
- For therms to kilowatt hours, multiply by 29.31

To convert stationary fuel (gas oil):

- For liters to kilowatt hours, multiply by 10.74

Disclosure 302-2: Energy Consumption Outside the Organization

There was no energy consumption in joules or multiples outside of the organization.

Disclosure 302-3: Energy Intensity

- Energy intensity ratio for the organization:** FY21 was 82.69 MWh/revenue (\$millions), a 7.7% reduction from FY20 89.56 MWh/revenue (\$millions)
- Organization-specific metric (the denominator) chosen to calculate the ratio:** Revenue (\$millions)
- Types of energy included in the intensity ratio; whether fuel, electricity, heating, cooling, steam, or all:** All Scope 1 and 2 consumed energy
- Whether the ratio uses energy consumption within the organization, outside of it, or both:** Within the organization

Disclosure 302-4: Reduction of Energy Consumption

- Amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples:** 26555.2 GJ

- b. **Types of energy included in the reductions; whether fuel, electricity, heating, cooling, steam, or all:** Electricity
- c. **Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it:** FY21 data has been used for these calculations
- d. **Standards, Methodologies, Assumptions, and/or Calculation Tools Used:** Savings approach performed in line with the International Performance Measurement and Verification Protocol (IPMVP)

Disclosure 302-5: Reductions in Energy Requirements of Products or Services

Not applicable

Data Center Management Indicators (Non-GRI)

- a. **Percentage of electricity as percentage of total energy:** 98.33% in FY21
- b. **Renewable energy as percentage of total energy:** 38.93% in FY21

Results: DXC has achieved the ISO 50001 Energy Management Standard across strategic data centers in FY21.

3.3 GRI 303: Water and Effluents

Management Approach Disclosures for Water and Effluents

DXC Technology uses water through its network of global office facilities, and the water consumption we use for cooling in our data center facilities has been removed where possible. As many of the facilities that we occupy are leased facilities, ownership of the water meters and readings from them are not under our control. Most of the water is from mains water systems, with wastewater returning to the sewerage network. Where DXC has direct responsibility for site water management, those sites are analyzing how much water is being used and noting annual consumption and cost. We will ensure that we manage water as a resource so that it is used efficiently and adverse impacts eliminated or minimized. We will achieve this by implementing site maintenance water-saving techniques and educating our employees on the importance and practices of water efficiency.

DXC has been calculating the water consumed across its portfolio from a FY19 baseline as part of a 15% absolute consumption reduction target. The sites that are in scope are aligned with those in the GHG emissions portfolio. Data is collected from sites from meter readings or from invoices, where possible, and consumption is estimated from the other locations based on average consumption from these sites. We achieved a 36% reduction against our FY19 baseline in FY21.

Disclosure 303-1: Interactions with Water as a Shared Resource

Water is consumed as a resource procured from third-party water companies globally and provided via a mains water supply. DXC employees use water as part of their day-to-day operations. There is no material use of water for products or data center operations.

A three-year target for water consumption reduction as a percentage of total water consumed has been set from a FY19 baseline to FY22. A target of 15% absolute reduction has been set, based on reconciliation of the global portfolio and business following the significant merger that created DXC and the implementation of water-saving initiatives. We have achieved a 36% reduction against our FY19 baseline in FY21.

There are no specific catchments where DXC causes significant water-related impact.

Disclosure 303-2: Management of Water Discharge-Related Impacts

Not applicable

Disclosure 303-3: Water Withdrawal

- a. **Total water withdrawal from all areas in ML and a breakdown of this total by the following sources, if applicable:**
 - i. **Surface water:** 0 ML
 - ii. **Groundwater:** 0 ML
 - iii. **Seawater:** 0 ML
 - iv. **Produced water:** 0 ML
 - v. **Third-party water:** 1,737 ML from mains suppliers
- b. **Total water withdrawal from all areas with water stress in ML and a breakdown of this total by the following sources, if applicable:**
 - i. **Surface water:** 0
 - ii. **Groundwater:** 0
 - iii. **Seawater:** 0
 - iv. **Produced water:** 0
 - v. **Third-party water:** 328 ML, from mains suppliers

Disclosure 303-4: Water discharge

Total water discharge from all areas in megaliters, and a breakdown of this total by the following sources, if applicable:

- i. **Surface water:** 0 megaliters
- ii. **Groundwater:** 0 megaliters
- iii. **Seawater:** 0 megaliters
- iv. **Produced water:** 0 megaliters
- v. **Third-party water:** 1,737 megaliters to sewerage network

Total water discharge to all areas with water stress in megaliters: 328 megaliters.

No chemicals or substances of concern are contained within the discharged water and for which DXC requires any permits

Disclosure 303-5: Water Consumption

- a. **Total water consumption from all areas in ML:** 0 ML
- b. **Total water consumption from all areas with water stress in ML:** Not applicable
- c. **Change in water storage in ML, if water storage has been identified as having a significant water-related impact:** Not applicable

3.4 GRI 305: Emissions

Disclosure 305-1: Direct (Scope 1) GHG Emissions

- a. **Scope 1 emissions:** 33,707 tCO₂e (please note: this figure includes emissions associated with fuel consumption, fleet vehicles, and refrigerants)
- b. **Gases included in the calculation; whether CO₂, CH₄, N₂O, hydrofluorocarbons (HFCs), PFCs, SF₆, NF₃, or all:** CO₂, CH₄, N₂O, and HFCs
- c. **Biogenic CO₂ emissions in metric tons of CO₂ equivalent:** Not applicable

- d. **Base year for the calculation, if applicable:** DXC Technology's target base year is FY19, and we have set our second round of three-year reduction targets between FY19 and FY22. Emissions in the base year were 70,222 tCO₂e.
- e. **Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source:** Intergovernmental Panel on Climate Change (IPCC) Fifth Assessment Report ([AR5] 100 year)
- f. **Consolidation approach for emissions; whether equity share, financial control, or operational control:** Operational control
- g. **Standards, methodologies, assumptions, and/or calculation tools used:** We align our reporting to the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard. LR provided Limited Assurance to our GHG inventory for FY18, FY19, and FY20, and Carbon Intelligence provided external verification to our GHG inventory in FY21. Sites over which we have operational control are within the scope of reporting. We base data on meter readings, supplier invoices, and supply logs wherever possible. If these are not available, we use estimation based on the most recent actual figures. If no actual energy consumption information is available for a site, we make an estimate based on its size and operation, recognizing that offices and data centers have different consumption patterns.

Disclosure 305-2: Energy Indirect (Scope 2) GHG Emissions

- a. **Gross location-based energy indirect (Scope 2) GHG emissions in metric tons of CO₂ equivalent:** Scope 2 emissions are 481,740 tCO₂e.
- b. **If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO₂ equivalent:** Scope 2 market-based emissions are 347,174 tCO₂e.
- c. **If available, the gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all:** CO₂, CH₄, and N₂O
- d. **Base year for the calculation, if applicable:** DXC's target base year is FY19, and we have set our second round of three-year reduction targets between FY19 and FY22. Location-based emissions in the base year were 806,180 tCO₂e.
- e. **Source of the emission factors and the GWP rates used, or a reference to the GWP source:** IPCC AR5 (100 year)
- f. **Consolidation approach for emissions; whether equity share, financial control, or operational control:** Operational control
- g. **Standards, methodologies, assumptions, and/or calculation tools used:** We align our reporting to the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard. Lloyds Register provided Limited Assurance to our GHG inventory (FY18, FY19, and FY20), and Carbon Intelligence provided external verification to our GHG inventory (FY21). Sites over which we have operational control are within the scope of reporting. We base data on meter readings, supplier invoices, and supply logs wherever possible. If these are not available, we might use estimation based on the most recent actual figures. If no actual energy consumption information is available for a site, we make an estimate based on its size and operation, recognizing that offices and data centers have different consumption patterns.

For location-based Scope 2 emissions reporting, we convert kWh to CO₂e using:

- UK emissions factors from <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2020>
- Australia from <https://www.industry.gov.au/data-and-publications/national-greenhouse-accounts-factors>
- New Zealand from <https://environment.govt.nz/assets/Publications/Files/Measuring-Emissions-Factors-Summary-2020-final.pdf>

- India from <https://www.cea.nic.in/tpeandce.html>
- European countries from <https://www.aib-net.org/facts/european-residual-mix> (total supplier mix), the United States from <https://www.epa.gov/egrid/download-data>, and all other countries from <http://www.iea.org>

Disclosure 305-3: Other Indirect (Scope 3) GHG Emissions

- Gross other indirect (Scope 3) GHG emissions in metric tons of CO₂ equivalent:** 2,349 tCO₂e
- If available, the gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃:** CO₂, CH₄, N₂O: CO₂, CH₄, and N₂O
- Biogenic CO₂ emissions in metric tons of CO₂ equivalent:** Not applicable
- Other indirect (Scope 3) GHG emissions categories and activities included in the calculation:** For FY21, we are reporting upstream Scope 3 emission in the category “Business Travel” only. DXC is currently in the process of calculating total Scope 3 emissions in all relevant categories, and this data is due to be published in the next 12 months. Scope 3 reporting for the past three years can be found in our TCFD report.
- Base year for the calculation:** DXC’s target base year is FY19, and we have set our second round of three-year reduction targets between FY19 and FY22. Emissions in the base year were 106,331 tCO₂e.
- Source of the emission factors and the GWP rates used, or a reference to the GWP source:** We applied 2020 UK Government conversion factors “Business Travel – Air with Radiative Forcing” to convert passenger km air travel to CO₂e and “Passenger Vehicles” to convert travel in privately owned vehicles to CO₂e.
- Standards, methodologies, assumptions, and/or calculation tools used:** We align our reporting to the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard. Lloyd Register provided Limited Assurance to our GHG inventory (FY18, FY19, and FY20), and Carbon Intelligence provided external verification to our GHG inventory (FY21). We applied 2020 UK Government conversion factors “Business Travel – Air with Radiative Forcing” to convert passenger km obtained from our supplier, selected based on the distance (haulage) and class of travel. We used “Passenger Vehicles” factors to convert travel in privately owned vehicles to CO₂e.

Disclosure 305-4: GHG Emissions Intensity

- GHG emissions intensity ratio for the organization:** FY21 (including Scope 1 and 2, business travel emissions): 29.21 metric tons CO₂e/revenue (\$millions)
- Organization-specific metric (the denominator) chosen to calculate the ratio:** Revenue (\$millions)
- Types of GHG emissions included in the intensity ratio:** All Scope 1 and 2 emissions, business travel (air and personal expensed mileage) for Scope 3
- Gases included in the calculation:** CO₂, N₂O, and CH₄

Disclosure 305-5: Reduction of GHG Emissions

- GHG emissions reduced as a direct result of reduction initiatives, in metric tons of CO₂ equivalent:** 1,999.3 tCO₂e estimated savings
- Gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all:** CO₂, CH₄, and N₂O
- Base year or baseline, including the rationale for choosing it:** FY21 data has been used for these calculations

- d. **Scopes in which reductions took place; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3):** Scope 2
- e. **Standards, methodologies, assumptions, and/or calculation tools used:** Savings approach performed in line with the International Performance Measurement and Verification Protocol (IPMVP)

Disclosure 305-6: Emissions of Ozone-Depleting Substances (ODS)

F-gas is reported as part of our Scope 1 emission reporting (please see Disclosure 305-1). Within DXC's operations, F-gas is used as a refrigerant gas for cooling equipment in data centers and offices. We ensure that our equipment is maintained regularly and that all losses are recorded. Emissions related to F-Gas are audited as part of ISO14064 criteria.

Disclosure 305-7: Nitrogen Oxides (NOx), Sulfur Oxides (SOx), and Other

- a. **Significant air emissions, in kilograms or multiples, for each of the following:**
 - i. **NOx:** 14,301 kg
 - ii. **SOx:** 27 kg
 - iii. **Persistent organic pollutants (POPs):** Not applicable
 - iv. **Volatile organic compounds:** 456 kg
 - v. **Hazardous air pollutants (HAPs):** Not applicable
 - vi. **Particulate matter (PM):** 553 kg
 - vii. **Other standard categories of air emissions identified in relevant regulations:** Not applicable
- b. **Source of the emission factors used: Road Transport Emission Factors:** 2019 UK National Atmospheric
- c. **Standards, methodologies, assumptions, and/or calculation tools used:** We used the Road Transport Emission Factors: 2019 UK National Atmospheric Emissions Inventory to calculate air emissions from fleet (diesel and petrol vehicles only) based on kilometers traveled.

3.5 GRI 306: Waste

Management Approach Disclosure for Waste

DXC Technology has more than 130,000 employees globally, with the main waste streams associated with ITAD, office-related general waste, and equipment associated with the rationalization of offices.

DXC's Virtual First program actively promotes employee autonomy in where employees work. Flexibility and increased remote work decreases commuting and business travel, reducing Scope 3 emissions. Our property portfolio has also become more space efficient due to the Virtual First program, further reducing our office-related waste generation in both the short and medium terms.

Our ITAD is mostly composed of desktop computers, laptop computers, printers, monitors, and servers. This type of waste is a primary concern, and we endeavor to be responsible when IT equipment nears the end of its functional life. DXC recognizes the potentially harmful environment and health effects caused by sending e-waste to landfill, and in alignment with the UN SDG 12 of responsible consumption and production, we are committed to sending zero e-waste to landfill, a goal that we have achieved over the past three years.

We regularly test used items to determine whether they can be reused, either within the company or by other organizations. We are ethically responsible for data security and ensure that no sensitive information is passed on when reselling IT hardware, including hard drives. This approach ensures that DXC and our customers are protected from data breaches. As part of that effort, we erase the hard drives

of all products we resell to government-approved standards and remove any identification of the previous user, fully inspecting and testing the device before resale.

We recycle items that are functionally obsolete or beyond repair to extract resources such as rare Earth metals via certified contractors. Recycling of such materials for use in new items reduces the environmental impact of IT equipment manufacture.

DXC Technology employs global contractors in our ITAD management process, facilitating company-wide reporting and monitoring against our target of zero e-waste to landfill.

Disclosure 306-1: Waste Generation and Significant Waste-Related Impacts

DXC is not a manufacturer of IT assets but is involved in their provision as part of the services provided to customers. IT assets are used through the following main routes:

- Assets are procured from the original equipment manufacturer (OEM) and used on customer locations.
- Assets are leased for a fixed time from an OEM, used at customer locations, and then returned at the end of the fixed term.
- Assets are purchased by the customer, and DXC supports these assets.
- In addition, DXC will also take end-of-life assets that are to be removed from customer operations as part of an overall service and go through the ITAD process.

The three-stage process to maximize the second life of assets is described in Disclosure 301: Materials. Following this approach, 65% of assets are reused and only 35% enter the waste stream, with those items being recycled.

Disclosure 306-2: Management of Significant Waste-Related Impacts

Engagement with OEMs on circularity and the ability to refurbish assets for reuse to extend the lifetime of the asset is a primary concern. Priority is placed with those OEMs who are best placed in the market to provide this offer, enabling an end-to-end closed-loop approach with the provision of assets and the refurbishment and reuse of equipment and materials.

Management of the process from provision of equipment by DXC through the refurbishment phase, together with recycling of any equipment and materials, is audited at an asset level to track what happens to materials and their disposition.

Disclosure 306-3: Waste Generated

In FY21, DXC generated 8,039 metric tons of solid waste across the global portfolio. This is an 11% reduction compared with FY20, when we generated 8,994 metric tons of waste. Waste was disposed using the following methods: Recycled, 13%; energy recovery, 4%; and landfill, 74%.

The reduction in disposal rates during FY21 has predominantly been influenced by the COVID-19 pandemic and the rationalization of the portfolio, which has led to a changing disposal stream and some wastes that could not go through the traditional disposal routes.

Disclosure 306-4: Waste Diverted from Disposal

This data is currently unavailable.

Disclosure 306-5: Waste Directed to Disposal

This data is currently unavailable.

3.6 GRI 308: Supplier Environmental Assessment

Management Approach Disclosures for Supplier Environmental Assessment

At DXC Technology, we seek to work with suppliers who practice and promote the core values of inclusion and diversity, human rights, health and safety (H&S), and environmental sustainability that are critically important to us and to our customers and partners. We expect our suppliers to adhere to our responsible business practices in areas such as screening for abuses, including modern slavery and the use of child labor; complying with environmental, health, and safety regulations and industry best practices; and implementing rigorous programs to eliminate bribery and other illegal behavior. We have integrated the evaluation of social and environmental criteria in our supply chain selection process and expect suppliers to share a commitment to sustainability in line with our supply chain principles. To that end, an addendum titled “Responsible Supply Chain Principles” is included in DXC’s global supplier contracts, and suppliers and associated subcontractors are expected to agree and adhere to it as it pertains to human rights, labor and corruption, and environmental management.

As part of our supplier management process, we ask suppliers that exceed a certain business volume with us to answer a sustainability questionnaire that covers how they respect internationally recognized human rights, labor and anticorruption standards, diversity and environmental sustainability, supplier diversity, and data security. Our screening to date has not identified major risks or significant negative impacts related to our suppliers’ social or environmental performance. In the event of major noncompliance with our standards, we would work with our suppliers and request corrective actions as necessary. We also use background checks in the early stages of our tender process. As noted above, we continue to enhance our responsible supply chain efforts by including our Responsible Supply Chain Principles as an addendum to our master services agreements. To further strengthen accountability, we train our supply chain professionals in understanding the importance of ethical, environmental, and human rights considerations in the supply chain itself.

You can read more about it by clicking on the link: [Responsible Supply Chain](#).

Disclosure 308-1: New Suppliers That Were Screened Using Environmental Criteria

As part of our supplier due diligence process, we conduct a responsible supply chain survey. In FY21, we undertook a review of our supply chain, including questions to suppliers regarding environmental and social topics. We surveyed a selection of our suppliers, including Tier 1 suppliers, some of whom may have high potential for risk elements related to modern slavery. Of the 107 suppliers chosen for the survey, a minority of the ones in scope did not have modern slavery statements, but through additional contact and research, we discovered that many had policies and programs like the modern slavery requirements of this report. Other suppliers were deemed low risk due to core activity or low spend. Results following responses to the survey were that approximately 94.4% of the in-scope spend was deemed low risk for modern slavery, and the remaining 5.6% will be considered for further inquiry. As our processes and policies include more stringent requirements for new and renewing contracts, we feel assured that the risk of modern slavery in the DXC supply chain is low and likely to diminish.

We gathered more feedback by interviewing our suppliers, covering approximately 8.7% of the spend in scope, and during this analysis, we found several policies and frameworks with a special focus on modern slavery as well as deeper engagement with the supplier’s own supply chain. There was also evidence of third-party assessments deep into the supply chain, and we were further reassured of the due diligence of some of our suppliers. We currently have no key suppliers under a necessary action plan, but we will continue to monitor and remain alert to any new risks that may emerge. There were no material breaches reported during FY21.

Disclosure 308-2: Negative Environmental Impacts in the Supply Chain

Detailed information is company confidential, but we can confirm that as standard practice, supplier-related environmental improvement actions are passed on to DXC’s supply chain management to take forward as part of day-to-day working practice. Issues are to be closed out within three months.

4 GRI 400: GRI Social Topics

4.1 GRI 401: Employment

Management Approach Disclosures for Employment

Our suppliers are an integral part of our sustainability strategy. In all our procurement activities, we take into careful consideration a set of economic, process-driven, and technical criteria as well as essential social, environmental, and ethical responsibilities such as human rights, labor conditions, anticorruption concerns, and environmental protection.

This is why we established the DXC Responsible Supply Chain Principles. These principles speak to the commitments we make to our customers and our relationships built on trust and personal responsibility. They establish the standards required for conducting business with DXC. Our Human Rights Statement was developed following the tenets of the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Universal Declaration of Human Rights.

We expect our suppliers to introduce suitable processes within their organizations that support compliance with applicable statutes and that drive continuous improvements with regard to the requirements laid out in these principles.

Accordingly, our goal is to work with our suppliers to ensure full compliance with these principles as they in turn apply them to their own suppliers with whom they work to deliver goods and services for DXC. We will consider these principles in our selection of suppliers, and DXC reserves the right to monitor supplier processes and procedures against these principles as part of DXC's ongoing Responsible Supply Chain program.

Disclosure 401-1: New Employee Hires and Employee Turnover

- a. Total number and rate of new employee hires during the reporting period, by age group, gender, and region:

FY21 Hires (April 1, 2020 – March 31, 2021)

Sum of Count Region/Gender	Age Group (Years)							Grand Total
	20 and Under	21 – 30	31 – 40	41 – 50	51 – 60	61 – 64	65 and Over	
Americas	43	785	765	547	451	111	69	2,771
(Blank)			2	3	1			6
Female	30	238	221	160	159	40	21	869
I Prefer Not to Answer		3	1	1	2			7
Male	13	544	541	383	289	71	48	1,889
Asia	8	6,941	2,098	434	64	1		9,546
Female	5	3,127	445	69	9			3,655
Male	3	3,814	1,653	365	55	1		5,891
Australia and New Zealand	2	82	143	127	56	13	3	426
Female		31	44	35	18	2	1	131

Sum of Count Region/Gender	Age Group (Years)							Grand Total
	20 and Under	21 – 30	31 – 40	41 – 50	51 – 60	61 – 64	65 and Over	
I Prefer Not to Answer		1						1
Male	2	50	99	92	38	11	2	294
Europe North	2	373	343	132	46	6	2	904
Female	1	121	97	46	11	1		277
I Prefer Not to Answer					1			1
Male	1	252	246	86	34	5	2	626
Europe South	2	477	312	219	80	7	1	1,098
Female		160	95	92	24			371
I Prefer Not to Answer			2					2
Male	2	317	215	127	56	7	1	725
UKIIMEA	40	253	150	168	100	20	7	738
Female	13	88	31	42	7	7	2	190
I Prefer Not to Answer		1						1
Male	27	164	119	126	93	13	5	547
Grand Total	97	8,911	3,811	1,627	797	158	82	15,483

b. Turnover during the reporting period, by age group, gender, and region:

FY21 12-Month Rolling Voluntary Attrition Rates by Region (April 1, 2020 – March 31, 2021)

Sum of Count Region	Gender			Grand Total
	Male	Female	Undisclosed	
Americas	12.2%	14.1%	17.0%	12.8%
APAC	12.3%	11.8%	26.2%	12.1%
EMEA	10.8%	9.6%	13.1%	10.5%
Grand Total	11.7%	11.5%	14.1%	11.7%

Disclosure 401-2: Benefits Provided to Full-Time Employees not Provided to Temporary/Part-Time Employees

As a global organization, DXC has an Equal Opportunity Policy that guides our engagement in management practices, including compensation and benefits without unlawful discrimination. This policy extends to employees and applicants across our global geographies to the extent required by applicable laws. However, if any specific provision directly conflicts with applicable country law, regulation, or labor agreement, then the relevant country law, regulation, or labor agreement will supersede that section or provision.

Disclosure 401-3: Parental Leave

This data varies on a country-by-country basis and is not available for DXC on a global scale at this point.

4.2 GRI 402: Labor Management Relations

Management Approach Disclosures for Labor Management Relations

In compliance with our Human Rights Statement, DXC respects the right to form and join trade unions and bargain collectively in accordance with the law.

Our Human Rights Statement is available at <https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Human-rights-statement.pdf>.

In Europe, we have an established European Works Council (EWC) that meets twice each year (e.g., every six months), either face to face or virtually. The EWC is competent for transnational topics (more information is available at <http://www.ewcdb.eu/company/455>). We recognize trade unions and consult with them on issues that affect the workforce. To that end, our employee relations strategy includes early engagement with trade union representatives as part of new business activities, with a view to forming an effective working relationship. Collective bargaining between DXC and employee representatives relates to working conditions (e.g., remuneration).

Disclosure 402-1: Minimum Notice Periods Regarding Operational Changes

Notice periods relating to significant operational changes are agreed on at a country/region level in agreement with the local legal framework, HR, management, trade unions, employee representatives, or work councils, where applicable. We do not track this information centrally at a global level.

4.3 GRI 403: Occupational H&S

Management Approach Disclosures for Occupational Health and Safety

DXC Technology maintains a corporate global H&S management system that includes the following:

- A global overarching H&S policy
- A planned H&S program, including global H&S objectives and targets

We seek to ensure the mitigation and control of H&S risks to employees, customers, and our community as a key business principle. The objective of our global H&S program is to provide governance, oversight, and direction for managing H&S risks posed by our organizational activities. We take a holistic approach, with our goal being to ensure a standard of excellence across our operations. To that end, we maintain a certified H&S management system through Lloyd's Register Quality Assurance (LRQA), and we also hold ISO 45001 certification for several locations in the following countries: Australia, Italy, Spain, and Romania. We maintain our H&S objectives, programs, and targets at both a global and country level to drive compliance to our policy goals.

We measure progress against identified key performance criteria that include both leading and lagging indicators and H&S initiatives implemented during the year. This data is then reported to our global H&S management team and country senior leadership teams. As might be expected, the DXC global H&S initiative for FY20/21 has been impacted by the global COVID-19 pandemic. Some programs were placed

on hold as all our efforts were dedicated to developing a safe working environment during the pandemic. Management at all levels, including the CEO, were engaged in this process, and we set up numerous global-, regional-, and country-level committees to look at the wellness, health, and safety of all DXC employees.

We also run an EAP to support employees with issues relating to work and family life. Key health issues for the business include COVID-19, mental health and well-being, musculoskeletal, and ergonomic issues. As required, DXC sponsors internal as well as externally sourced programs to monitor employee health and well-being. We run these programs at the global and country levels, and they additionally include regular seasonal flu vaccination programs and employee health checks in some countries. To further support employee well-being, we have established a 24x7 D-ROC.

At some of our locations, we have also introduced well-being, resilience, and stress management sessions. DXC has a global EAP that enables employees from each country where we operate to seek professional support. Through this program, practical information and counseling on a variety of topics is available to employees and their partners or family members. Information can be provided over the phone or via email, and counseling is offered at a time and location convenient to the employee, with the following benefits:

- No cost to the employee
- Available 24 hours a day, 7 days a week, 365 days a year
- Confidential, independent, and impartial assistance

The DXC Asset Protection team is made up of staff from the H&S and Security teams. Together, they have supported the organization with a COVID-19 task force that reviews COVID-secure office planning and customer locations for the safety and security of our employees working across all locations.

Disclosure 403-1: Occupational H&S Management System

DXC migrated from OHSAS18001 to ISO 45001, but several countries still hold external accreditation as mentioned in GRI 403. A future focus for DXC will be in the Employee Wellness and Resiliency program.

Disclosure 403-2: Hazard Identification, Risk Assessment, and Incident Investigation

Within the DXC management system, we are reviewing our locations under the following headings:

- Type of location
- Employee head count working at the location
- Hazards and potential incidents that may occur

This will enable us to categorize and review the potential hazards and risks associated with each location and the potential risks to our employees.

Within DXC, the fundamental task is to perform risk assessments on work-related tasks while considering working environments. Likelihood and severity will also play a factor in identifying suitable and sufficient control measures.

The DXC Global Wellness Health & Safety (WH&S) internal webpage contains links to several country-specific policies and processes. Employees can engage with our reporting system by phone or email to obtain information or safety-related guidance. If employees feel unsafe, then they are encouraged to stop working, move to a safe place, and inform their manager for support and guidance. The WH&S lead within the region/country is available for any further support and guidance.

DXC has a reporting process that allows employees to report or communicate an incident, accident, or near miss. This accident reporting procedure prompts the manager to investigate the root cause of the accident, and after conducting this analysis, report any findings required to in-country local authorities within the time required.

Disclosure 403-3: Occupational Health Services

Our EAP supports all employees worldwide. Driven by HR, this program incorporates wellness and resiliency and provides additional assistance support mechanisms. In countries where a legal requirement stipulates it, we offer occupational health services through both external and internal resources to support our employees' well-being.

Disclosure 403-4: Worker Participation, Consultation, and Communication on Occupational H&S

We are in the process of ensuring that our occupational H&S management system integrates the consultation and participation of employees and their representatives, including work councils and local safety committees, into its structure. Currently, a variety of mechanisms are used to communicate with employees across DXC with regard to general operations and H&S management operations, including internal webpages, town halls, and country-led communications.

Disclosure 403-5: Worker Training on Occupational H&S

H&S training is determined based on employee work-related tasks and assigned via DXC University. When external H&S training is required, courses are identified and reviewed by the H&S team.

Disclosure 403-6: Promotion of Worker Health

DXC senior management promotes and demonstrates a culture in the organization that supports the H&S management system. They also provide the necessary resources and support appropriate H&S initiatives and programs to ensure the implementation of this policy in line with our business objectives and compliance obligations.

To that end, we offer an externally provided EAP that is widely communicated and promoted to employees. Our EAP offers a wide range of services, all of which are anonymous and free.

We also promote internal communications from our EAP supplier highlighting a number of topics throughout the year. For example, the current wellness program is promoting the Walk & Talk Challenge, a way of promoting walking but also communicating with others.

Disclosure 403-7: Prevention and Mitigation of Occupational H&S Impacts Directly Linked by Business Relationships

The goal of effective emergency preparedness and response is to establish planning, prevention, response, and recovery for emergencies and disasters to protect life and property as well as to minimize business disruption.

Senior management has designated a crisis management structure that includes representatives who serve as incident coordinators/commanders as required (Crisis Management teams).

Each site develops its own emergency preparedness and response procedures to identify and manage applicable H&S emergencies. These plans aim to prevent or mitigate adverse H&S risks, including actions in responding to actual emergency situations; preventing or mitigating the consequences of emergency situations; periodically testing planned response actions, where practical; periodically reviewing and revising process(es) and planned response actions, in particular, after the occurrence of emergency situations or tests; and providing relevant information and training related to emergency preparedness and response to relevant interested parties, including persons working under its control.

We manage a global response to site preparedness through our Emergency Preparedness program.

Disclosure 403-8: Workers Covered by an Occupational H&S Management System

DXC operates a global and regional wellness H&S model that supports senior management and employees with the implementation of safety management systems.

We support both formal and informal H&S committees across the organization, with committee meetings that include both workers and management held at the site level in some countries (where required by law) to implement processes and procedures as stipulated in the ISO 45001 service management system (SMS).

Disclosure 403-9: Work-Related Injuries

Although injury rate reporting varies from country to country, DXC collects a set of global key performance indicators that are presented at EHS committee meetings and discussed with senior management representatives. The performance indicator information we collect includes:

- Number of incidents occurring in the period
- Regulatory or similar notices or other penalties or fines received by a country
- Number of EHS training sessions attended by employees
- Number of audits/inspections conducted at sites
- Number of H&S meetings held

DXC FY21 Lost Workday Case Rate (April 1, 2020 – March 31, 2021)

Region	
Americas	3.30
Asia	0.00
Southern Europe	0.14
Central and Northern Europe	0.07
Australia and New Zealand	0.00
UKI, Middle East, and Africa	0.00

The recordable incidence rate is the number of all work-related lost-time and no-lost-time cases requiring more than first aid per 100 employees working a full year. Rates are calculated using OSHA definitions for recordability around the world and using OSHA calculation methodologies. The figures are based on employees working an average of 2,000 hours during a full year.

DXC FY21 Recordable Incidence Rate (April 1, 2020 – March 31, 2021)

Americas	1.03
Asia	0.00
Southern Europe	0.02
Central and Northern Europe	0.00
Australia and New Zealand	0.14
UKI, Middle East, and Africa	0.01

Additional FY21 EHS Data (April 1, 2020 – March 31, 2021)

	Total No. of Lost Workday Cases	Total No. of DXC Recordable Cases	No. of Employees	Total No. of Person-Hours Worked
Americas	32	10	23,898	2,389,800
Asia	0	0	54,672	5,467,200
Southern Europe	16	8	5,685	568,500
Central and Northern Europe	10	1	25,258	2,525,800
Australia and New Zealand	0	8	12,054	1,205,400
UKI, Middle East, and Africa	0	1	9,459	945,900
Global	58	28	131,026	13,102,600

Disclosure 403-10: Work-Related Ill Health

The global COVID-19 pandemic occurred during the reporting period, and we have taken proactive measures recommended by the World Health Organization and relevant local public health authorities to minimize the exposure and transmission of this virus. In addition, we are following our infectious disease plan protocols with a focus on our employees' well-being and business resilience.

We are committed to providing the safest working environment for our employees and visitors while maintaining continuity of services to our customers. To that end, we have established prevention, response, and recovery plans aimed at protecting our employees and property and minimizing business disruption. These plans are designed to operate and serve our customers in the event of a crisis due to a natural or man-made event, including, but not limited to, an outbreak of infectious diseases.

Business continuity planning is integrated into our normal business processes. Preparedness requires continuous planning and testing initiatives, and we prepare for many regional and local disaster scenarios, including pandemics.

4.4 GRI 404: Training and Education**Management Approach Disclosures for Training and Education**

We view professional and technical development as a corporate responsibility, a strategic investment in our employees' capabilities and the company's ability to successfully lead customers on their digital transformation journeys. Through our global learning management system, we offer thousands of learning programs to reskill, upskill, and cross-skill employees. We support the belief that people learn best through a multifaceted development approach. A typical DXC learning plan includes a blend of online courses, technology certifications, instructor-led classes, digital badges, online learning communities, special assignments, and job changes.

Employees use multimodal learning channels across mobile, tablet, and desktop devices and access various assets such as audio books, videos, and courses for learning anywhere, anytime. Virtual practice labs also enable our employees to interact and experiment with technology and solutions in low-risk, exploratory environments. In FY21, we pivoted to a virtual-only delivery model and initiated several

learning journeys for multiple cohorts such as women leaders and AEs. DXC's Performance Development Framework incorporates a range of processes and actions that enable our employees to contribute to the organization's success, including goal setting, regular feedback and coaching, career development planning, and ongoing performance discussions. We empower employees to take control of identifying and achieving their career goals through our formal development planning process.

Disclosure 404-1: Average Hours of Training per Year per Employee

In FY21, DXC employees completed more than 1.8 million hours of noncompliance formal learning through instructor-led training, virtual instructor-led training, and web-based training within DXC University. Sixty-nine percent of DXC employees participated in this noncompliance formal training, with more than 1.1 million training completions. In FY21, the average learning hours of noncompliance formal training per employee recorded an increase to 18.8 hours from 15.9 hours in FY20.

Please note that the learning data not included in these figures includes training completions from the DXC Partner Network, external training sources, or video and book accesses from Skillsoft content.

Disclosure 404-2: Programs for Upgrading Employee Skills and Transition Assistance Programs

Some key training program highlights include the following:

- More than 119,000 DXC employees have completed training programs through DXC University.
- In FY21, 8,627 employees invested 18,737 hours and completed 36,191 learning activities in the goFLUENT enterprise business language training program.
- Globally, 19,257 new joiners were onboarded, with 85% compliance on new employee orientation (74% of that orientation training was done online, and the rest was virtual instructor-led).
- In FY21, we trained a total of 3,359 college hires across India, Malaysia, and Japan for a total of 1.9 million training hours and 98.8% course completion. The top training courses were Java, Dotnet, Mainframe MS Dynamic, SAP, and Campus to Corporate.
- The EDGE* Engineering Global SMEs team continues to schedule weekly Q&A sessions and events to introduce concepts and the DXC tools/resources to support them. The goal is to enable us to deliver and excel in the global marketplace through guidance on best practices, tools, and accelerators to deliver excellence for our customers in a consistent and flexible manner. Total subscribers now number 14,000+, and the team organized 242 sessions in FY21, with more than 32,500 hours of live learning. * Enabling Delivery and Global Excellence
- Guilds, or communities of practice that get together on a regular basis to learn and share knowledge, help each other solve problems and collaborate on innovative ideas that add value to DXC and our customers. They are organized based on areas of practice, rather than organizational boundaries, and they complement the use of squads, tribes, and chapters within DXC.
- A total of 376 pieces of training content representing more than 6,452 minutes and 47,00 views were created and published through DXC Knovio, a rapid content authoring and hosting platform for sharing content.
- DXC University generated 10,066 custom learning badges for employees who earned them through training completions.

The DXC Partner Network accomplished many goals on the technology reskilling and training initiatives fronts:

- In FY21, we launched DXC Academies on MS Teams for MS, AWS, HPE, Pure, and IBM.
- In FY21, more than 73,000 employees attended Microsoft training sessions to increase their digital skills and certifications with DXC's Partner Network Microsoft Practice. By the end of FY21, more than

6,500 employees were Microsoft Azure certified professionals, with more than 8,500 employees Microsoft certified in other technologies (Azure, Workplace, Security, Power Platform, D365).

- In FY21, DXC employees earned more than 7,000 Oracle certifications through a combination of learning subscriptions (SaaS and PaaS/OCI), certification vouchers, and Oracle promotions and bootcamps via the Oracle Partner Network program. Learning subscriptions were allocated to 250 employees globally, contributing to 9,500 hours of training.
- As part of our regular technology awareness sessions conducted for employees and leaders, AWS Day in January 2021 had a total participation of more than 5,000 employees, with 2,739 employees ultimately trained on the technology.
- In FY21, we had 453 accreditations and 241 certifications in VMware.
- In FY21, we conducted more than 1,200 Google Cloud training courses, with more than 300 new certifications earned, bringing total Google certification to more than 900.
- In FY21, we covered 5,196 employees in a training initiative on agile space and practices.
- Various learning and certification initiatives and drives were launched through the Global Innovation Delivery Center on technologies like SAP, Azure Dynamics, Safe Pair of Hands, ITIL V4, and many more, covering roughly 15,500+ employees and 24,000+ certifications. The launch of our Automation University registered more than 4,000 employees.
- DXC Technology India Private Ltd. was named one of LOMA's 2021 Excellence in Education award winners. Only 56 of the more than 900 LOMA member companies were recognized for this honor. To be eligible for this award, a company must be a full, affiliate, or academic member of LOMA and demonstrate ongoing support and promotion of LOMA education programs by virtue of having employees complete a minimum of 50 designation program courses during 2020; having a high percentage of successful completions on all designation program courses; and increasing successful course completions by more than 5% compared to 2019.

We also fostered multiple leadership reskilling initiatives, such as the following:

- Aspiring Leaders, a self-paced DXC University course targeting individual contributors with leadership aspirations (ANZ and Europe)
- Leadership Development, self-paced modular leadership development programs from DXC University with a focus on leadership topics like interpersonal skills, professional excellence, and team effectiveness and targeted at aspiring and first-time people managers in ANZ and Europe
- Management Foundations, a self-paced DXC University course targeting existing people managers in a first-time people manager role.
- Leadership Fundamentals, a four-day face-to-face program targeting front-line level 6 leaders with a focus on the neuroscience of leadership, handling difficult conversations, and building high-performing teams
- Accelerating Change, a four-day face-to-face program focused on level 7 leaders who have completed Leadership Fundamentals with 360-degree leadership feedback followed by 90-minute coaching
- Rising Leader, a blended learning program of 18 self-paced courses and 4 virtual instructor-led sessions based on practical case studies with self-evaluation, reflection, and action planning targeted at level 4 or 5 first-time managers
- Take the Lead, level 7 talent identified for executive roles with a focus on developing executive presence and business savviness in a 10-day face-to-face program followed by coaching by mentors

Disclosure 404-3: Percentage of Employees Receiving Regular Performance and Career Development Reviews

a. Percentage of total employees by gender and by employee category who received a regular performance and career development review during the reporting period:

The FY21 year-end review process resulted in a successful completion rate of 99.98%.

By gender: 67% male and 32% female*

By employee category*:

Casual	0.1%
Fixed Term	0.22%
International Assignee	0.6%
Lux Employee	8.4%
Lux Intern	0.008%
Lux Temp	0.008%
Regular	85%
Temporary/Fixed Term	0.2%
FDS Employee	2.1%
Lux Private Ent	2.44%
Unknown	0.96%

*The breakdown of this data has been calculated using the HR data provided for Disclosure 2-7.

We are now moving from a performance management to performance development philosophy to deliver excellence for our customers and colleagues.

Our Performance Development Framework incorporates a range of processes and actions that enable our people to deliver excellence while contributing to the organization's success. This performance development philosophy:

- Focuses on developing performance along with assessing performance
- Encourages frequent and effective performance and career conversations
- Enhances employee impact on business performance

The performance development process includes goal setting, performance development enablers (check-in conversations, coaching, continuous feedback from customer and colleagues), mid-year review, and year-end review. We will encourage the use of these throughout FY22 and going forward.

4.5 GRI 405: Diversity and Equal Opportunity

Management Approach Disclosures for Diversity and Equal Opportunity

The DXC Technology Global Diversity and Non-Discrimination Policy guides our engagement in management practices, including, but not limited to, recruitment, selection, job assignment, subcontracting/procurement of goods and services, transfer, promotion/demotion, layoff, return from layoff, discipline including termination, training, education, tuition, social and recreational programs, compensation, and benefits without unlawful discrimination on the basis of and without regard to race, ethnicity, color, religion, sex (including pregnancy, childbirth, and related medical conditions), national

origin, disability (physical or mental), age, protected veteran status or military service or affiliation, marital status, sexual orientation, gender identity and expression, protected genetic information, political affiliation, or any other basis prohibited by law.

The DXC Global Diversity and Non-Discrimination Policy states: “As allowable by law, this policy applies worldwide to all directors, officers, executives, employees, and representatives of DXC, its wholly-owned subsidiaries, and their affiliates. If any specific provision in this policy directly conflicts with applicable local law, local labor agreement, local collective bargaining agreement, or a local policy rolled out by DXC, the applicable local law, local labor agreement, local collective bargaining agreement, or local policy, as applicable, will supersede that section or provision, and the remainder of this policy will remain in effect.”

DXC promotes an organizational culture that encourages ethical conduct and a commitment to compliance with our Code of Conduct, with internal company policies, and with the law. All employees shall observe and preserve our core corporate values, make decisions and choices that are consistent with these values, and comply with applicable internal policies and the law in all places where DXC does or seeks to do business. To learn more about our commitment to a diverse and inclusive corporate culture, please see <https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Human-rights-statement.pdf>.

Disclosure 405-1: Diversity of Governance Bodies and Employees

- a. **Percentage of individuals within the organization’s governance bodies in each of the following diversity categories (gender, age group, other indicators of diversity):**

FY21 DXC Executive Leadership Diversity

Executive Leadership by Gender

Gender	Sum of Count	%
Female	4	24
Male	13	76
Grand Total	17	100

Executive Leadership by Age

Age Group (Years)	Sum of Count	%
41 – 50	5	29
51 – 60	11	65
61 – 64	1	6
Grand Total	17	100

Executive Leadership by Minority

Minority	Sum of Count
(Blank)	7
Asian (not Hispanic or Latino): A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, for example, Cambodia, China, India,	1

Minority	Sum of Count
Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam (U.S.)	
I Prefer Not to Answer (U.S.)	1
White (not Hispanic or Latino): A person having origins in any of the original peoples of Europe, the Middle East, or North Africa. (U.S.)	8
Grand Total	17

Please see the DXC Technology Board of Directors and other committees' composition on <https://investors.dxc.com/governance/board-of-directors/default.aspx>

b. Percentage of employees per employee category in each of the following diversity categories:

Gender:

Gender	%
Male	67
Female	33
I Prefer Not to Answer	0
Grand Total	100

Age Group: Under 30 Years Old, 31-50 Years Old, 51 Years and Over

Age Group (Years)	%
20 and Under	0
21 – 30	28
31 – 40	32
41 – 50	22
51 – 60	14
61 – 64	3
65 and Over	1
Grand Total	100

- c. **Other indicators of diversity where relevant (such as minority or vulnerable groups):** Not disclosed, global information unavailable at this time.

Disclosure 405-2: Ratio of Basic Salary and Remuneration of Women to Men

We do not report the specific ratio as that is DXC Technology confidential information.

4.6 GRI 406: Non-Discrimination

Management Approach Disclosures for Non-Discrimination

Same as GRI 405.

Disclosure 406-1: Incidents of Discrimination and Corrective Actions Taken

DXC Technology does not provide metrics as a result of sensitivity/company confidentiality considerations.

4.7 GRI 409: Forced or Compulsory Labor

Management Approach Disclosures for Forced or Compulsory Labor

DXC Technology has global policies and procedures in place to combat human rights violations, such as child labor or forced labor, and to explicitly target modern slavery and human trafficking, and these policies apply to all geographies in which we operate. Additionally, our local entities are empowered to respond to local risks and issues to further mitigate concerns or risks. DXC policies related to preventing modern slavery include the DXC Code of Conduct and accompanying employee training material, the DXC Human Rights Statement, and the DXC Responsible Supply Chain Principles (with accompanying guidance and employee training material). The Code of Conduct, Human Rights Statement, and Responsible Supply Chain Principles are published on dxc.com, and these policies are also made available to our directors, officers, managers, employees, and representatives through awareness and training programs.

DXC efforts cover all levels of our engagement with suppliers. We have incorporated specific questions on modern slavery and human trafficking into our initial screening survey for suppliers, so our policies are at the foundation of every interaction thereafter. We also have incorporated specific questions on modern slavery and human trafficking into our corporate responsibility screening survey for our largest direct suppliers by spend.

Disclosure 409-1: Operations and Suppliers at Significant Risk for Incidents of Forced or Compulsory Labor

The types of activities that DXC procures — for example, software activities — are largely skilled, requiring high levels of education and specialist knowledge as well as English language skills. These are considered low risk for modern slavery. We also have a high level of assurance that there is little risk of modern slavery among our suppliers.

Currently, we have no key suppliers under a necessary action plan, but we will continue to monitor and remain alert to any new risks that may emerge. There were no material breaches reported during FY21.

4.8 GRI 413: Local Communities

Management Approach Disclosures for Local Communities

At DXC, we value our society, our people, and the communities in which we live and work. To help them, we are engaged in numerous efforts and projects, all with the aim of working to improve the lives of our employees and the communities in which we live and work. Engaging both locally and on a global level drives meaningful change and connects our employees with our giving worldwide. Our DXC India Foundation, for example, aims to improve the social mobility of underrepresented/underprivileged groups by collaborating with nonprofit partners to foster digital literacy and the learning of new skills, particularly

in science, technology, engineering, and mathematics (STEM). In FY21, the DXC India Foundation worked with 19 NGOs and contributed to 25 projects in the areas of education, inclusion, humanitarian support, and environmental sustainability. We have impacted 65,000 beneficiaries through 23 volunteering events with active participation from 950 volunteers. Overall, we recorded 2,900 volunteering hours.

Our balanced, integrated approach enables the greatest impact in areas of major importance to DXC, including:

- Education by fostering global literacy, with a focus on STEM learning for children from kindergarten to college age
- Health and wellness by enhancing people's health and wellness at a local and global level, with a focus on veterans, people with disabilities, and challenges related to child hunger and poverty
- Disaster relief by supporting emergency assistance to those in need after a disaster or period of crisis or trauma (<https://blogs.dxc.technology/2021/02/01/dxc-vietnam-provides-disaster-and-health-crisis-relief-in-rural-districts>)

The DXC Dandelion program, established in 2013, is an initiative to help establish careers for people on the autism spectrum. Reimagining neurodiversity helps individuals on the spectrum build valuable IT skills and careers, and this program combines robotics with commercial IT industry teaching and methodologies to help participants develop technical, life, and executive functioning skills. To date, we have established 10 DXC Dandelion teams across Australia, working within our public and private sector customers to employ more than 120 people on the autism spectrum. The program expanded into the UK in June 2021, with future expansion plans for Asia, the United States, and Europe (<https://dxc.com/au/en/cp/social-impact-practice/dxc-dandelion-program>).

In addition, DXC is a proud partner of the Scott-Morgan Foundation, which is on a mission to apply advanced technologies to empower people with extreme disabilities, illnesses, and other challenging conditions to continue to lead full and socially rich lives. The foundation was established by Dr. Peter Scott-Morgan, a visionary British roboticist, author, and speaker who, in 2017, was diagnosed with motor neuron disease. DXC is leading the technology roadmap and integration for the foundation, bringing all the unique pieces of hardware, software, and AI into an integrated working solution designed to aid communication and mobility. The vision is not only to collaborate with Peter but to also create an open and scalable set of technologies that could one day help others around the world overcome life-challenging conditions. Read more at <https://dxc.com/uk/en/about-us/inclusion-and-diversity/dr--peter-scott-morgan-becomes-peter-2-0>.

Disclosure 413-1: Operations with Local Community Engagement, Impact Assessments, and Development Programs

DXC Technology does not complete social or environmental impact assessments (including gender impact assessments), but as a company, we recognize that there are challenges in the overall attraction to studies in STEM education fields as well as in attracting women to this market. As a social investment in this space, local DXC teams run STEM education programs to help young students engage in STEM activities, with some initiatives and targets for underprivileged and underrepresented participants (girls, minorities, people with disabilities; <https://blogs.dxc.technology/2021/09/29/dxc-supports-digital-literacy-with-iberia-codes-contest/>).

For example, DXC interns based in our Tysons, Virginia, headquarters recently went to an elementary school in nearby Herndon to volunteer with Rec-PAC, a summer camp run by the Fairfax County Park Authority for children in grades K-7. More than 4,000 children across several elementary schools in the county participate in Rec-PAC's summer programming. Because many of these children come from low-income families, the camp lacks many of the resources other private summer camps might have, so to help alleviate some of these challenges, our interns prepared fun and educational activities for campers. DXC has also donated other resources to the camp (<https://blogs.dxc.technology/2019/08/16/dxc-intern-volunteers-run-stem-activities-for-rec-pac-summer-campers/>).

In most of the countries where we operate, we run charity activities to serve the local community. As mentioned above, the DXC India Foundation has worked with 19 NGOs and contributed to 25 projects in the areas of education, inclusion, humanitarian support, and environmental sustainability, and our successful Dandelion program has helped integrate neurodiverse individuals into the workplace. Since 2014, the program has strived to support workforce diversity, allowing individuals to develop their technical expertise while providing a holistic employment experience that prepares them for future careers within the technology field.

For more information, please see the Community section of our webpage at <https://dxc.com/us/en/about-us/corporate-responsibility/community-and-people-impact>.

Disclosure 413-2: Operations with Significant Actual and Potential Negative Impacts on Local Communities

We believe that the significant potential negative impact on local communities is zero.

4.9 GRI 414: Supplier Social Assessment

Management Approach Disclosures for Supplier Social Assessment

At DXC Technology, we seek to work with suppliers who practice and promote the core values of inclusion and diversity, human rights, H&S, and environmental sustainability that are critically important to us and to our customers and partners. We expect our suppliers to adhere to our responsible business practices in areas such as screening for abuses, including modern slavery and the use of child labor; complying with EHS regulations and industry best practices; and implementing rigorous programs to eliminate bribery and other illegal behavior. We developed our DXC Human Rights Statement following the tenets of the UN Guiding Principles on Business and Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, and the UN Universal Declaration of Human Rights. Underscoring these key commitments, our Responsible Supply Chain Principles establish a set of clear, detailed standards for doing business with DXC across five areas:

- Human rights
- Labor
- Bribery and corruption
- Environment
- Equality, diversity, and inclusion

We expect our suppliers to create processes and programs that align with our values. We consider adherence to our Responsible Supply Chain Principles when we select suppliers, and we reserve the right to monitor supplier processes and procedures against these principles as part of our ongoing Responsible Supply Chain program. We expect our suppliers to support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses, as defined by law or otherwise identified by international human rights organizations and conventions. We are committed to minimizing the risk of all forms of forced labor and human trafficking within our business or supply chain. To this end, we have published a formal Human Rights Statement that sets out the steps we have taken to combat modern slavery and human trafficking at DXC and in our supplier organizations. Through our risk-based approach to eradicating these human rights abuses from our supply chain, we have incorporated specific questions on modern slavery and human trafficking into our screening survey for new suppliers and our screening survey for our largest direct suppliers by spend. When hiring new DXC employees and individual contractors, we check that they are legally eligible to work, undertake, and pass background checks and external referencing, as well as ensure that they pass our security clearance. We are satisfied that these multiple checks allow us to identify victims of trafficking or slavery.

Disclosure 414-1: New Suppliers That Were Screened Using Social Criteria

New suppliers to DXC who are under contract must agree to the Responsible Supply Chain Principles. We have a defined new vendor-add process that includes a restricted parties list check, a financial check,

and an embargoed countries check, as well as sign off by the relevant supply chain manager. This is governed by the DXC Third-Party Risk Management Policy.

Disclosure 414-2: Negative Social Impacts in the Supply Chain and Actions Taken

We identified no suppliers as higher risk based on performance. No action plans were required in FY21, as we identified no actual performance issues relating to modern slavery.

4.10 GRI 418: Customer Privacy

Management Approach Disclosures for Customer Privacy

Privacy Imperative

Global privacy and information management represents an important area for multinational organizations that collect, process, and transfer all kinds of information, such as confidential employee, customer, and business partner data, including personal data as defined in applicable data protection laws and regulations. Recent developments in the global privacy landscape, such as the “Schrems II” ruling by the EU Court of Justice and new privacy laws in various U.S. states, Brazil, and China, are only a few examples indicating the global legislative trend that the regulatory climate for data privacy and protection continues to grow in scope and complexity, as do the financial, legal, and reputational costs of a potential data breach. There are no boundaries because customer privacy affects DXC Technology inside and out, everywhere in the world. Legislation with an extraterritorial reach and customer contracts with a global scope require us to apply a holistic global approach to manage the privacy of customer data that is in our custody in every jurisdiction globally. We are engaged in all aspects of customer data processing, whether data is stored onsite within customers’ networks, hosted in DXC data centers, handled by DXC service personnel, or processed on behalf of DXC by our subcontractors, group companies, and other strategic partners.

Managing Privacy

Our PDPO aims to uniformly and cohesively foster the protection of confidential information as well as comply with international regulations on privacy and data protection. Implementation and maintenance of a global data privacy program is a strategic part of achieving consistent data protection across all of our companies worldwide via standardized policies and privacy-aware employees. We designed our privacy and information security policies and procedures to mitigate and minimize vulnerabilities, including loss, misuse, unauthorized access, and unauthorized disclosure of confidential and personal information. In this regard, comprehensive and strategic mitigation of the risks associated with a data breach is a top priority for DXC. Our approach includes an in-place crisis management plan to prepare for potential data breach incidents through a response team triaging adequate defined and comprehensive investigation and notification protocols to ensure a coordinated, timely data breach response. This response includes management escalation and reporting actions as well as management of remediation efforts. If a breach occurs, we will duly report the incident to the relevant customers and authorities in accordance with contractual and legal requirements. To ensure that company, customer, and personal information is accessed only to meet business requirements, we provide employees with training on privacy and security matters.

Policies and Commitments

We have implemented and maintain a company-internal privacy policy as well as a publicly accessible enterprise online privacy notice to reflect the value we place on earning and maintaining the trust of our employees, customers, business partners, and others whose personal data or other confidential information is shared with us and to ensure our commitment and dedication to their privacy. We are committed to the lawful treatment and confidential handling of sensitive information, including personal data, and have adopted a set of global information management policies, including privacy and data protection, security, system access, information categorization, and other relevant policies governing the collection, use, disclosure, transfer, retention, and deletion of information. We confirm that we will process personal data to which we have access in connection with our performance under any service agreement: (1) only on behalf of and for the benefit of the contractor; (2) in accordance with the service agreement

and contractor's prior written instructions, if any; and (3) as otherwise required by all applicable data protection laws and regulations. We confirm that we will not process any personal data for any other purpose, absent specific written instructions from the contractor.

Security and Confidentiality

We have implemented a comprehensive suite of technical and organizational security measures and controls enabling us to comply with the requirements of applicable data protection laws regarding the secure and lawful collection, storage, use, transfer, or processing of personal data. These measures include appropriate data processing and data transfer agreements aimed to provide an adequate level of privacy protection by and between DXC service partners. Across our global data security program, we use cybersecurity expertise to deter and mitigate threats, and we maintain ISO 27001 Information Security Management certifications at key data centers and delivery centers. To adequately address related compliance obligations and requirements, DXC has established a data privacy governance structure supported by an effective data privacy program. We will not disclose personal data to law enforcement unless required to do so by law. Where possible, we will attempt to redirect the law enforcement agency directly to the contractor or promptly notify the contractor and provide a copy of the access request, unless legally prohibited from doing so.

Ongoing Monitoring

We are committed to implementing "privacy by design" principles, including a privacy-management life cycle across all business areas. As part of this life cycle, we maintain ongoing monitoring of our privacy obligations, policies, and controls, including data protection impact assessments and privacy reviews of internal systems and processes used in the handling of personal data. External business partners, service providers, vendors, and suppliers are obliged to comply with our policies and applicable laws and are subject to due diligence and compliance reviews accordingly. Subject to contractual agreements, customers shall have the right to inspect, with reasonable notice and during normal business hours, our business processes and practices involving the processing of personal data in relation to the services being provided to the customer. Respectively, DXC agrees to provide the customer with the reasonable documentation and information required for the customer to conduct a due diligence audit. We also agree to correct any security deficiencies or vulnerabilities caused by us or our subcontractors within a time frame mutually agreed to by the parties involved. DXC's security program is a key priority for the Board of Directors and our Executive Team. Accordingly, members of the Board of Directors receive information security updates at least quarterly; either directly from the Chief Operating Officer or the Chief Information Security Officer. Updates reflect security performance, third-party assessments, and ongoing continuous improvement efforts.

Goals and Targets

DXC strives for best-in-class data protection and privacy management, which requires a sound data privacy governance structure and an effective data privacy compliance and best practices program to ensure that we meet ever-changing and increasingly complex regulatory standards and all contractually agreed privacy obligations. We have started to engage in ISO 27701 (Privacy Information Management System) Certification for its key delivery centers worldwide. DXC also trains staff annually on matters of information security and data privacy. In FY21, 98.3% of employees completed information security training.

Resources

With a global lead PDPO officer based in the EU and a network of privacy professionals at the corporate and regional levels, DXC's PDPO is a well-resourced and qualified strategic compliance function that operates under the authority of our global Ethics and Compliance Office. The PDPO is responsible and accountable for advising our businesses on best practices in privacy compliance and to develop policies, procedures, training, and risk assessment as well as monitoring programs that will enable us to provide adequate levels of personal data protection for our customers, employees, and other relevant individuals in all geographies and jurisdictions around the world.

Disclosure 418-1: Substantiated Complaints Concerning Breaches of Customer Privacy and Losses of Customer Data

Any specific communication about complaints or breaches is deemed “customer confidential” information and cannot be disclosed under these circumstances.

End of Report.

Forward Looking Statements

All statements in this document that do not directly and exclusively relate to historical facts constitute “forward-looking statements.” These statements represent current expectations and beliefs, and no assurance can be given that the results described in such statements will be achieved. Such statements are subject to numerous assumptions, risks, uncertainties and other factors that could cause actual results to differ materially from those described in such statements, many of which are outside of our control. Furthermore, many of these risks and uncertainties are currently amplified by and may continue to be amplified by or may, in the future, be amplified by, the coronavirus disease 2019 pandemic and the impact of varying private and governmental responses that affect our customers, employees, vendors and the economies and communities where they operate. For a written description of these factors, see the section titled “Risk Factors” in DXC’s Annual Report on Form 10-K for the fiscal year ended March 31, 2021, and any updating information in subsequent SEC filings, including DXC’s Quarterly Report on Form 10-Q for the quarterly period ended September 30, 2021.

No assurance can be given that any goal or plan set forth in any forward-looking statement can or will be achieved, and readers are cautioned not to place undue reliance on such statements which speak only as of the date they are made. We do not undertake any obligation to update or release any revisions to any forward-looking statement or to report any events or circumstances after the date of this press release or to reflect the occurrence of unanticipated events except as required by law.



DXC Technology

[DXC.com](https://www.dxc.com)

About DXC Technology

DXC Technology (NYSE: DXC) helps global companies run their mission critical systems and operations while modernizing IT, optimizing data architectures, and ensuring security and scalability across public, private and hybrid clouds. The world's largest companies and public sector organizations trust DXC to deploy services across the Enterprise Technology Stack to drive new levels of performance, competitiveness, and customer experience. Learn more about how we deliver excellence for our customers and colleagues at [DXC.com](https://www.dxc.com).

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