

# Human Rights Policy APMEA and Americas except USA

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## Revision History:

Version	From	To	Description	Author	Approved By
1	19 Jul 2021	-	First Copy	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head

**Objective:**

HCL is committed to ensuring that people are treated with dignity and respect. It is the philosophy of the Company to identify, prevent, and mitigate human rights violations resulting from, or caused by our business activities, through human rights due diligence and mitigation. The Company is committed to investigating, addressing and responding to the concerns of employees and to taking appropriate corrective action in response to any such violations.

**Applicability:**

HCL practices are guided by the inherent philosophy which is to promote human rights, create an environment where individuals are respected, treated equally, and ensure that no individual or group of individuals in the Company engages in activities that directly or indirectly violate human rights. This Policy is applicable to all employees of HCL Technologies Limited and its subsidiaries worldwide (herein referred to as "HCL" or "the Company"), including but not limited to full-time/ part-time/ fixed-term/ expat employees. The benefits of this policy will also extend to all associates, stakeholders, ad-hoc, daily wagers, temporary staff, on-contract staff (direct & indirect employees), clients, consultants, trainees, apprentices and/ or interns employed by the Company and also all visitors to HCL globally (herein referred to as "individuals")

**Policy Details:**

The Company values diversity and believes in having a long-standing commitment to provide equal opportunity and intolerance of discrimination and harassment at the workplace or at work. HCL is dedicated to maintain a workplace that is free from discrimination or harassment on the basis of race, color, religion, creed, marital status.

- HCL and all employees/individuals must continue to respect, support and promote the human rights. We confirm that:
- HCL conducts business in a manner that respects the rights and dignity of all, complying with all legal requirements.
- HCL respects internationally recognized human rights, as set out in the International Bill of Human Rights and the International Labour Organization's declaration on Fundamental Principles and Rights at Work.
- HCL treats everyone who works for the Company fairly and without discrimination. Our employees, agency staff and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity.
- HCL respects freedom of association. Where its employees wish to be represented by trade unions or works councils, HCL will cooperate in good faith with the bodies that its employees collectively choose to represent them within the appropriate national legal frameworks.
- HCL respects the rights of people in communities impacted by its activities. HCL will seek to identify adverse human rights impacts and take appropriate steps to avoid, minimize and/or mitigate them.
- Where HCL identifies that it has caused or directly contributed to adverse impacts on the human rights of others, HCL shall provide for, or cooperate in the remediation of the adverse impacts through legitimate process

This policy focuses on fostering an open and inclusive workplace that upholds all human rights and includes the following components:

- Respect for Human Rights
- Valuing Diversity
- Safe and Healthy Workplace
- Workplace Security
- Equal Opportunity Employer

-Other details

## **1. Respect for Human Rights**

The following are the basic human rights that shall be granted, to ensure a safe and healthy work environment:

- a. Right to safety
- b. Right to be heard
- c. Right to be informed
- d. Right to be redressed

## **2. Valuing Diversity**

Regardless of personal characteristics or status, the Company does not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is unacceptable in the workplace and in any work related circumstance outside the workplace. HCL endeavors to promote equality of opportunity and eliminate discrimination in the planning and delivery of services. HCL shall ensure that all employees have equal opportunity to participate in the democratic process as may be applicable to each country from where the Employee operates. HCL expresses its commitment to do business with ethical values and embrace practices that supports environment, human rights, and labor laws on a worldwide basis.

## **3. Safe and Healthy Workplace**

The Company provides a safe and healthy workplace and complies with applicable health & safety regulations and internal requirements. HCL is dedicated to maintain productive workplace by minimizing the risk of accidents, injury and exposure to health risks.

HCL is also committed to engage its employees to continually improve health and safety at workplaces, including the identification of hazards and remediation of health and safety issues.

## **4. Workplace Security**

The Company is committed to maintain a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions. Security safeguard for workplace is provided as needed, while ensuring that employee privacy and dignity is maintained.

## **5. Equal Opportunity Employer**

HCL is an Equal Opportunity Employer and endeavors to treat all potential candidates and employees equally without regard to their race, religion, sex, color, age, national origin, marital status, sexual orientation, medical condition, disability etc. HCLT further provides equal opportunities in employment, upgrading, promotion or transfer, recruitment or recruitment advertising, layoff or termination, wages or other compensation, selection for training, including apprenticeship, pre-apprenticeship etc. Also HCL does not promote practices like child labour, bonded labour, Human slavery or Human Trafficking. The standards are guided as set by the International Labour Organization (ILO). Any act notified defying the above stated norms shall be liable for disciplinary actions as per the law of the land.

## **6. Other Details**

There are a few more Policies relevant for Human Rights which guide HCL practices, as given below:

- a. Prevention & Redressal of Sexual Harassment - All Employees and individuals must conduct themselves so as to ensure a work environment that promotes respect and upholds the dignity of every employee and individual at the workplace and does not become the cause of any physical or mental harassment. This term and act of "harassment" includes, but is not restricted to unwelcome behavior whether through visual displays, verbal, non-verbal, physical or other conduct making a person submit to requests, favors, threats or demands that alter or threaten to alter the terms of employment and interfere with work conditions. If any employee/ individual believes that he/ she has been harassed in any manner at workplace or at work (office parties, work-related social functions, phone calls, sending messages through cellular phones or email from home even on an off day, or other contacts outside office hours and work-related interactions) he/she has the right to submit a complaint as per our applicable policy at [secure@hcl.com](mailto:secure@hcl.com). Prevent and prohibit all and

any acts of harassment, including sexual harassment, in order to ensure a safe and healthy work environment. You may refer to the Prevention & Redressal of Sexual Harassment at Workplace Policy for details regarding scenarios, circumstances, responsibilities and the procedure for filing a complaint.

b. Anti- Bribery & Anti-Corruption- An organizational environment which is affected by corruption may in turn lead to instances wherein an employee's rights might be curbed. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for HCL or under HCL's control. Employees are required to avoid any activity that might lead to, or suggest a breach of this Policy since it may lead to instances violating the Human rights aspect. A bribe may be anything of value and not just money such as: gifts, inside information, sexual or other favors, corporate hospitality or entertainment, offering employment to a relative, payment or reimbursement of travel expenses, charitable donation or social contribution, abuse of function and can pass directly or through a third party. Corruption includes wrongdoing on the part of an authority or those in power through means that are illegitimate, immoral, or incompatible with ethical standards. Corruption often results from patronage and is associated with bribery. For details of other policies that covers various aspects of this Policy, please refer [myhcl.com](http://myhcl.com) > Policies Hub > Policy for Prevention and Redressal of Sexual Harassment at workplace (Secure)/ Whistleblower Policy/ Code Of Business Ethics and Conduct/ Anti-Bribery and Anti Corruption Policy/Disciplinary Policy/Equal Opportunity Employment Policy

c. How to raise a concern?

Employees/ individuals are encouraged to raise concerns about any issue regarding or suspicion of malpractice at the earliest possible stage. In case of any ambiguity if a particular action constitutes bribery or corruption or any other related query, such concerns must be raised with Reporting Manager and/or the Whistleblower Committee via [whistleblower.hcl@com](mailto:whistleblower.hcl@com). However, it is always advisable for Employee/ individuals to submit a written complaint narrating the true sequence of the events leading to the violation along with any supporting evidence. The Company is committed to keep the identity of the reporting Employee/ individuals confidential to the maximum extent as consistent with the Company's legal obligation but subject to the Company's need to investigate reported violations. Besides the above, the Employee may choose to report to - [risk@hcl.com](mailto:risk@hcl.com)