

Global Policy on Prevention of LGBTQ+ Discrimination

Spirit of Wipro

Be passionate about clients' success

Treat each person with respect

Be global and responsible

Unyielding integrity in everything we do

1. Objective of the Policy

Wipro believes that all people have an equal right live free from violence, persecution, to discrimination and stigma. Wipro welcomes the efforts taken in many countries to protect the rights of Lesbian, Gay, Bisexual, Transgender and Queer or Questioning+ (LGBTQ+) people. Wipro is determined to provide a work environment that is free from any form of discrimination or harassment and to maintain an environment where all LGBTQ+ employees are considered equal, and their dignity is respected and promoted. Any employee, who is involved in LGBTQ+ discrimination, shall be subject to appropriate disciplinary action.

2. Spirit of the Policy

Wipro strives to promote equality through prevention, elimination and redressal of LGBTQ+ discrimination in the workplace. We aim to:

a) Encourage our employees to take an active role in preventing LGBTQ+ discrimination.

b) Instill in employees the understanding of creating a discrimination and harassment-free work environment for LGBTQ+ employees.

c) Deter employees from committing any form of discrimination against LGBTQ+ employees.

d) Assure all LGBTQ+ employees that they can rely upon the organization's support in resolving their concerns related to discrimination at the workplace.
e) Take reasonable steps to ensure laws in all geographies are complied with in the Wipro work environment.

3. Prohibition of LGBTQ+ Discrimination

Discrimination at workplace adversely affects a productive working environment and can adversely impact the health, confidence, morale and performance of those affected by it, including anyone who witnesses or experiences such unwanted behavior.

Discrimination against LGBTQ+ employees at the workplace or at an extension of the workplace is strictly prohibited and will not be tolerated under this policy. Further, any retaliation against an employee who has complained about LGBTQ+ discrimination or who has cooperated/participated in an investigation of LGBTQ+ discrimination complaint is similarly prohibited and will not be tolerated.

4. Scope and Applicability of the Policy

This policy will be applicable to all allegations of discrimination at the workplace. Workplace includes all those places visited by an employee arising out of or during course of employment. It includes extended workplace while travelling, such as transportation in any mode provided by Wipro for undertaking a journey, place of stay and work home), venue of work-related (e.g: events. customer sites/locations. work-related venue of entertainment or leisure.

This policy shall be applicable to all employees (including part-time, temporary, contractual personnel, trainees, and persons on probation and apprentices while on an engagement with Wipro

anywhere in the world as well as any other third party who is present on Wipro premises such as candidates, visitors, or guests.) Wipro includes its subsidiaries and affiliate companies.

Wipro's customers, vendors, vendor employees, consultants, and anyone else doing business at Wipro's premises or relating to any work being carried out on behalf of our organization must also comply with this policy. Wipro being a global company, we follow law of the land where we operate. In case of any location specific PSH law, we do comply with the same and in absence of such law, this policy will apply. Anyone doing business at Wipro's premises or relating to any work being carried out on behalf of Wipro must also comply with this policy.

6.1. What is LGBTQ+ discrimination?

LGBTQ+ discrimination is any unwelcome verbal, non-verbal or physical conduct that is offensive, demeaning, humiliating, derogatory, or any other inappropriate behaviour that fails to respect the dignity of a LGBTQ+ employee. An act/conduct can be categorized as discrimination if:

a) purpose or effect of violating the dignity of a LGBTQ+ employee based on their sexual orientation or/and gender identity and expression.

b) purpose or effect of creating an intimidating, hostile, or offensive work environment.

c) purpose or effect of unreasonably interfering with a LGBTQ+ employee's work performance.

d) It otherwise adversely affects a LGBTQ+ employee's employment or career pursuit opportunities.

6.2. Prevention of LGBTQ+ discrimination

Consistent with Wipro's code of business conduct and application laws, we shall ensure all reasonable steps for prevention of LGBTQ+ discrimination at work. Such steps shall include:

a) Widely circulating our policy against LGBTQ+ discrimination amongst all employees.

b) Providing training to employees on our policy against LGBTQ+ discrimination through awareness sessions and during onboarding

c) Establishing a complaints committee as part of the OMBUDS function at Wipro to respond to LGBTQ+ discrimination complaints.

d) Implementing the findings of the complaints committee.

e) Informing employees of the relevant laws

Mode of registering complaint

In addition to reporting LGBTQ+ discrimination to the employee's manager or someone else within the employee's chain of command, or a member of HR, any employee, contractor, vendor, vendor employee etc. who feels they have been subjected to discrimination because of their sexual orientation or gender identity/expression (or any other person acting in good faith on their behalf) shall have the option to seek formal intervention directly from the Designated Complaint officer (if the grievance occurred in India) or Ombuds through the following means:

a) Email to Designated Complaint officer at mellissa.ferrier@wipro.com with details

b) Contact via intranet/internet through the intranet "MyWipro ->App Store -> Information -> Ombuds", or through the internet at www.wiproombuds.com

c) Additionally, a complainant may raise a concern through the Hotline where the concern can be made through a telephone call or online in several global languages. Details of the Hotline are available at myWipro > My Information > Ombuds Process > Ombuds Channel > Telephone.

The concern will shall be investigated by the Designated Complaint Officer if the grievance occurred in India and by the Designated Ombudsperson for all other locations.

All complaints alleging a violation of this policy will be promptly and thoroughly investigated and where appropriate, prompt remedial action will be taken in accordance with applicable local law.

5. Employee Rights and Obligations

Pursuant to the preventive steps under this policy, every employee should:

a) Become fully informed about the contents of this policy, and complete any trainings required by Wipro. In some countries/ states, training will be required under law. Cooperate with any measures introduced to promote equal opportunities at workplace.
b) Respect the sensitivities of others.

c) Never take discriminatory actions or decisions which are contrary to the letter and spirit of this policy.

d) Offer information and support to any person who the employee suspects is being discriminated and/or otherwise report any such instance of LGBTQ+ discrimination to the appropriate persons. e) Maintain confidentiality regarding any aspect of an inquiry to which the employee may be a party.
f) Be aware that the employee retains the right to file complaint of unlawful discrimination under the law of the land with local authorities including police.

g) If an employee chooses to file such a complaint with police authorities, Ombuds or the designated compliant officer will provide all reasonable assistance in this regard as required under the applicable law.

h) Be aware of and follow local customs with respect to people interactions at workplace.

6. Continuous Sensitization of Employees to Issues on Prevention of Harassment

Wipro will endeavor to sensitize and train its employees on the prevention of LGBTQ+ discrimination.

7. No Retaliation

Unlawful retaliation can be any action that could discourage a worker from coming forward to make or support a LGBTQ+ discrimination claim. Adverse action need not be job-related or occur in the workplace to constitute unlawful retaliation.

Even if the alleged LGBTQ+ discrimination does not turn out to rise to the level of a violation of law, the individual is protected from retaliation if the person had a good faith and belief that the practices were unlawful. However, the retaliation provision is not intended to protect persons making intentionally false charges of LGBTQ+ discrimination. No person covered by this Policy shall be subject to adverse action because the employee, in good faith, reports an incident of LGBTQ+ discrimination, provides information, or otherwise assists in any investigation of a discrimination complaint. Wipro shall not tolerate such retaliation against anyone who, in good faith, reports or provides information about suspected LBGTQ+ discrimination. Any employee of Wipro who retaliates against anyone involved in a LBGTQ+ discrimination investigation shall be subjected to disciplinary action, up to and including termination. All employees or consultants working in the workplace who believe they have been subject to such retaliation should inform a supervisor, manager, or Wipro's Ombuds process.



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Tel: +91 (80) 2844 0011 Fax: +91 (80) 2844 0256 **wipro.com** Wipro Limited (NYSE: WIT, BSE: 507685, NSE: WIPRO) is a leading global information technology, consulting and business process services company. We harness the power of cognitive computing, hyper-automation, robotics, cloud, analytics and emerging technologies to help our clients adapt to the digital world and make them successful. A company recognized globally for its comprehensive portfolio of services, strong commitment to sustainability and good corporate citizenship, we have over 220,000 dedicated employees serving clients across six continents. Together, we discover ideas and connect the dots to build a better and a bold new future.

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