



# Diversity, Equity & Inclusion Policy









# 1. Document Control

Function	Corporate HR
Sub-function	Diversity, Equity & Inclusion
Policy Owner Director, Head – Diversity, Equity & Inclusion	
Policy Effective Date	01.04.2021

# 2. Purpose

The primary objective of this policy is to promote equitable and unbiased practices across the organization. Wipro does not tolerate unlawful or unethical discrimination and ensures that everyone must be treated with respect and dignity. Through this approach, we strive towards fostering healthy relationships amongst everyone regardless of their personal characteristics, background or identity, or diverse abilities thereby making Wipro a safe workplace. We are committed to making progress on gender inclusion, disabilities inclusion, nationalities, suppliers' diversity, generational diversity, LGBTQ+ inclusion and racial and ethnic inclusion. We also remain focused on creating a culture of belonging through the elimination of unconscious bias and moving toward conscious inclusion.

Wipro is resolute in its commitment to fostering a diverse and inclusive workplace where every individual is valued and respected. In alignment with Principle 6 of the United Nations Global Compact (UNGC) and the standards set forth by the International Labor Organization (ILO), we are dedicated to upholding the principles of equality and non-discrimination.

#### 2.1 Audience

All employees of Wipro, including those of all our affiliates, subsidiaries and acquired entities.

# 3. Scope

This policy binds all employees together and fosters a healthy workplace which ensures respect and dignity for everyone. It covers everyone globally (including contract workers, interns, trainees, and others with any other kind of work engagement with the organization) regardless of their backgrounds, experiences, or hierarchies.

## 3.1 Policy Details

Wipro is committed to fostering a culture of inclusion, diversity, and equity. Inclusion is in our DNA, which defines us, guided by our strong values – the "Spirit of Wipro." These values are the cornerstone of our Diversity Equity & Inclusion (DEI) practices. We are determined to build an ecosystem where inclusive behaviours are lived and practiced by all and remain part of the organization's ethos.

We are committed to make deep inroads in the area of gender inclusion, disabilities inclusion, nationalities, suppliers' diversity, LGBTQIA+ (Lesbian, Gay, Bisexual, Transgender, Queer, Intersex and Asexual) inclusion and racial & ethnic inclusion. In addition, we remain focused on creating a culture of belonging through elimination of unconscious bias and moving towards conscious inclusion.

We define DEI as recognizing individual differences to honestly engage, understand, and draw on a variety of unique perspectives. We celebrate and learn from diverse ideas, backgrounds, perspectives, and experiences. Wipro is an equitable workplace for all, where everyone is treated with fairness and respect. We believe such an inclusive environment welcomes everyone and nurtures an overall sense of belonging. The essence of co-creating, guided by our values, defines DEI at Wipro.

Inclusion is a "way of life" at Wipro, and this is achieved by integrating diversity effortlessly into everyday working and encouraging all employees to be their authentic selves at all times. We are committed to creating and nurturing a sense of belonging through equitable practices and by embracing all forms of differences. We aspire to help our clients maximize the value of their businesses and make Wipro an employer of choice that attracts, develops, and retains diverse talent.

The strategic agenda of the DEI charter is: "Treating everyone equally and ensure inclusivity for all". We recognize and respect diverse people in our workforce such as people of different age groups, color, family or marital status, language, national origin, religion, socioeconomic status, veteran status and other characteristics that make people unique.

# 4. Inclusion in Action

We are committed to leveraging unique experiences and perspectives from our employees across a diverse spectrum to serve our customers across the globe. Our initiatives and programs help employees become more aware of their biases so they can demonstrate inclusive behaviour. Inclusive strategies are followed throughout the employee lifecycle (hiring, training, career development, rewards and recognition, compensation & benefits, etc.) and drive enhanced employee experiences.

There is leadership engagement to make inclusion a reality at Wipro, along with an internal network of passionate enthusiasts and allies from Business, Functional Teams and HR Teams who drive efforts to build Inclusion as a "way of life".

Substantial references of Wipro's inclusive practices:

## 4.1 Policies/ Procedures

Our key people policies and processes are inclusive in nature, underscoring fairness and equity and creating a balanced approach across a diverse spectrum of employees. Some of our policies offer certain benefits, and explicitly call out the support system for those from historically underrepresented backgrounds to consciously ensure non-discrimination. In addition, the policies are devised in line with statutory requirements wherever necessary.

#### 4.2 Communication and Awareness

We focus on ensuring sustained communication about DEI to all employees. Regular leadership communication through townhalls, team meets, awareness mailers, and blogs reinforce our inclusion philosophy. We ensure that our communication is inclusive and accessible to all.

## 4.3 Equal Employment Opportunity

Wipro is an equal-opportunity employer. We focus on meritocracy and do not engage in or support discrimination in hiring, compensation, access to training, promotion, or retirement based on ethnic and national origin or ancestry, race, caste, religion, disability, age, gender, creed, marital status, colour, sex (including pregnancy, lactation, childbirth or related medical conditions), gender identity, gender expression, sexual orientation, citizenship status, physical or mental disability, protected veteran status, genetic information (including testing and characteristics) or any other characteristic protected by law. We hire and promote based on qualifications, performance, and abilities. Wipro's commitment to equal opportunity employment applies to all persons involved in the company's operations and prohibits unlawful discrimination by any employee, including managers, supervisors and coworkers. The prohibition of discrimination also includes prohibition of actions or conduct contrary to the requirements of this policy by any client, vendor or outside party toward any Wipro employee. The prohibition of discrimination includes prohibition of discriminatory statements, written or verbal, including but not limited to graffiti and/or social media, and/or any discriminatory conduct, whether it involves, managers, supervisors, co-workers or any third parties, as referenced above.

## 4.4 Accessibility

We recognize that accessibility is a lever for creating a barrier-free environment where everyone can excel. We strive to provide accessible digital and physical infrastructure by adhering to universal design principles. We follow WCAG (Web Content Accessibility Guidelines) standards for digital accessibility and applicable guidelines as per statutory norms for infrastructural accessibility. In line with our philosophy, reasonable accommodations/adjustments are made wherever necessary.

## 4.5 Advancing Diversity, Equity and Inclusion

As a responsible organization, we raise awareness and educate employees on key areas of diversity, equity, and inclusion. We commemorate globally recognized days such as International Women's Day (IWD), International Day of Persons with Disabilities (IDPD), Black History month, Pride Month and others as per United Nations guidelines. Through these frequent events, we aim to minimize stereotypical behaviours, and foster inclusion in true spirit. Our approach towards gender inclusion is based on a unique "life-stage" – philosophy inherent in our Women of Wipro (WoW) framework. Our WoW programs have been tailored and customized to cater to the needs of women at every stage of their lives and work; they are not a "one-size-fits-all" approach. The framework structures Wipro's internal policies, processes, and initiatives to promote gender inclusion and empowerment. Focused training and mentoring programs for women, networking opportunities with women leaders from across the industry, and inclusive policies and practices foster a gender-inclusive work environment at Wipro.

# 4.6 Disability and Accommodation

To comply with applicable laws ensuring equal employment opportunities to individuals with disabilities, Wipro makes reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or an employee unless undue hardship and/or a direct threat to the health and/or safety of the individual or others would result. We ensure that appropriate accommodations are made for employees or applicants to perform the essential job functions, as and when such needs are communicated or when the company otherwise receives notice of such requirement. We evaluate the information obtained from the employee regarding the disability or limitations, along with all necessary documentation supporting the need for accommodation supplied by the employee and work with the employee to identify possible accommodations, if any, that will help to eliminate the barrier(s) or limitation(s).

We also consider requests for reasonable accommodations for medical conditions related to pregnancy, childbirth and lactation where supported by medical documentation and/ or as required by applicable law.

#### 4.7 Sexual and Other Unlawful Harassment

We are committed to providing a work environment that is free of prohibited harassment. As a result, we maintain a strict policy prohibiting sexual harassment and harassment against applicants and employees based on any legally recognized basis, including, but not limited to: race, color, religion, sex, pregnancy (including lactation, childbirth or related medical conditions), sexual orientation, gender identity, gender expression, age (as defined under applicable law), national origin or ancestry, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed service member status or any other status protected law. Based on our commitment to a harassment-free workplace, violation of this policy may include conduct that does not reach the level of being actionable under applicable law.

Wipro's anti-harassment policy applies to all persons involved in its operations and prohibits harassing conduct by any employee of the company, including managers, supervisors, and non-supervisory employees (i.e. co-workers). The policy also protects employees from prohibited harassment by third parties, such as clients, vendors, or any outside party not affiliated with the company. This policy is supplemented by Wipro's Global Policy on Prevention of Sexual Harassment.

#### 4.8 Grievance Redressal

Our internal grievance redressal system - the Ombuds process - enables employees, vendors and service providers, contract employees, clients, retainers, consultants, trainees, and interns to raise any grievance or complaint across various categories like sexual harassment, any other form of prohibited harassment, denial of accommodation based on disability or religion, discrimination, health & safety, unfair employment practices, among others. Similarly, our Global Policy on Prevention of Sexual Harassment (PoSH) at the workplace provides a strong framework of confidentiality, assurance, and protection to all.

All the cases are evaluated objectively and fairly. Any person subjected to a violation of this policy or who observes or believes that any person has engaged in any violation of this policy also has the option to reach out to their L1 or L2 manager, HR manager or to the Ombudsperson (at ombuds.person@wipro.com or through the hotline at www.wiproombuds.com). For complaints regarding sexual harassment, employees can also write to <a href="mailto:safe.workplace@wipro.com">safe.workplace@wipro.com</a>.

The Company endeavours to protect the privacy and confidentiality of all parties involved to the extent possible, consistent with a thorough investigation. If it is determined that any of the foregoing policies has been violated, remedial action is taken, commensurate with the severity of the offense. Appropriate action is also taken to deter any future violations of these policies. If a complaint of conduct prohibited by these policies is substantiated, we ensure that appropriate disciplinary action, up to and including discharge, is taken.

## 4.9 Protection Against Retaliation

We have prohibited retaliation against any person by another employee or by the company for using this complaint procedure, reporting proscribed harassment, or for filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

Employees may also report any retaliation prohibited by this policy based on the same Grievance Redressal, referenced above. We ensure that any report of retaliatory conduct is investigated in a thorough and objective manner and appropriate disciplinary action is taken if such report is substantiated, including and up to termination of employment.

Wipro's robust commitment to diversity, equity and inclusion is evident in its comprehensive policies and practices aimed at fostering fairness, equity, and respect across the organization. By implementing inclusive strategies throughout the employee lifecycle, Wipro enhances the employee experience, attracts diverse talent, and fosters a positive workplace culture. Through regular communication and awareness initiatives, the company educates employees on the importance of inclusion and diversity, while its grievance redressal system ensures a safe and respectful workplace. The establishment of the DEI Council, led by the CEO and senior leaders, underscores top-level commitment and accountability for driving inclusion as a strategic priority, contributing to organizational success and sustainability.

# 5. DEI Council

The CEO is the key sponsor of the council which was formed in 2018. It is chaired by the Global DEI Head and includes the CHRO, as well as the Business and Geography Heads across the board.

The primary objective of the council is to drive inclusion in a sustainable manner across the organization as it is a key agenda for our board reviews.

The council meets quarterly to review key metrics and overall progress and discuss priorities for the upcoming quarter. Each council leader is accountable for driving a key actionable by cross-leveraging and collaborating with teams across the company.

# 6. Governance Mechanism

The Org Capability team is responsible for the governance of the DEI charter. Quarterly and monthly scorecards are published to the DEI Council for review of key metrics like gender pay parity, attrition, hiring among other. Employee perception of DEI is gauged through annual employee engagement surveys. Key organizational metrics on DEI are voluntarily disclosed publicly in the Annual Report and Sustainability Reports. We regularly track completion of the Unconscious Bias e-module, with a key focus on leadership.

# 7. Approving Authority

The Global DEI Head is the final approving authority for rolling out any initiatives under the charter and is also the approval authority for budgets. The DEI function as a CoE resides under corporate Human Resources - Organization Capability function.

# 8. Review of Policy

This policy document is subject to periodic review and updates based on legal developments and experience.

# 9. Addendum for the United States

## **Religious Accommodation**

We make reasonable accommodations for applicants' and employees' religious beliefs, observances, and practices when a need for such accommodation is identified and reasonable accommodation is possible. The accommodations include reasonable accommodations in accordance with applicable law for observance of religious holidays and sincerely held religious beliefs, including providing time off for observation of official holidays or providing exceptions to dress and grooming standards, unless doing so would cause an undue hardship on company operations, including any safety risks based on the requested accommodation.

# **POC** for queries

Head – Diversity, Equity & Inclusion

# **10. Revision History**

Version	Revision Date	Reasson for Change	Drafted/ Reviewed By	Approved By	Date Approved
4.3	01.04.2021	Revision of the policy to included evolved perspectives and philosophy	Aji George – General Manager and Head, Org Capability	Sunita Cherian  – Senior Vice President, Global I&D Head and Chief Culture Officer	01.04.2021
1.1	26.04.2023	Updates under focus and commitment	Org Capability Team	Aji George – General Manager and Head, Org Capability	26.04.2023
1.2	08.08.2024	Updates from a Global perspective	Diversity, Equity & Inclusion Team	Director, Head - Diversity Equity & Inclusion	08.08.2024



# **About Wipro Limited**

Wipro Limited (NYSE: WIT, BSE: 507685, NSE: WIPRO) is a leading technology services and consulting company focused on building innovative solutions that address clients' most complex digital transformation needs. Leveraging our holistic portfolio of capabilities in consulting, design, engineering, and operations, we help clients realize their boldest ambitions and build future-ready, sustainable businesses. With 250,000 employees and business partners across more than 60 countries, we deliver on the promise of helping our clients, colleagues, and communities thrive in an ever-changing world.









