Ministry of Corporate Affairs (MCA) revised National Voluntary Guidelines (NVG) 2011 on Social, Environmental and Economic Responsibilities of Business and aligned it with the national and international developments in sustainability space. This resulted in formulation of National Guidelines on Responsible Business Conduct (NGRBC) in 2019.

At Wipro, the NVG's Principles and Core elements are deeply integrated into practices and processes. During the reporting year, we assessed our position with the new NGRBC guidelines, a brief of which is given below:

- As early adopters of GRI (Global Reporting Initiative) and IR (Integrated Reporting), our policies and processes cover most elements of the NGRBC- which include identification and engagement with key stakeholders, materiality determination and adopting a comprehensive approach that makes responsible business conduct an integral part of our strategy.
- Our policies like the Ecological Sustainability Policy, Health and Safety Policy, Human Right Policy, Code of Business Conduct, Supplier Code of Conduct, Data Privacy and CSR policy are implemented by specific operational guidelines and procedures under a cross functional charter which includes the Risk function, Legal and Compliance, Human Resources, Information Security, Operations, Procurement and Ombuds, among others. The tenets of Protect-Respect-Remedy are also integrated in implementation. We ensure appropriate due diligence of these programs through process and performance audits—both internal and external—through frameworks like ISO 14001, ISO 45001 and GRI among others.
- The details of governance by sub-committees of the Board are provided as part of our Corporate Governance Report from page no. 128 of this Annual Report.
- Communications— transparent disclosure is made through various public forums like CDP, Annual reporting, and through investor led frameworks like DJSI, FTSE, MSCI, Vigeo, among other. In addition, leadership actively evangelizes these values-based approaches through regular forums.

We have robust internal processes to track performance of different elements in NGRBC at multiple levels of detail and coverage – many of which are covered in our public disclosures. We plan to report as per the new Business Responsibility and Sustainability Report (BRSR) format next year (FY22).

Section A: General Information about the Company

- Corporate Identity Number (CIN) of the Company L32102KA1945PLC020800.
- 2. Name of the Company

Wipro Limited.

3. Registered address

Doddakannelli, Sarjapur Road, Bengaluru-560035, Karnataka, India.

4. Website

https://www.wipro.com.

5. E-mail id

sustain.report@wipro.com.

6. Financial Year reported

April 1, 2020 to March 31, 2021 (FY 2020-21).

Sector(s) that the Company is engaged in (industrial activity code-wise)

IT Software, Services and related activities. NIC Code-62013.62020.

8. List three key products/services that the Company manufactures/provides (as in balance sheet)

Please refer page nos. 34 to 37 of this Annual Report.

9. Total number of locations where business activity is undertaken by the Company

i. Number of international locations (Provide details of major 5)

139 office locations and 2 data centers please refer complete list of locations available on the Company's website at https://www.wipro.com.

ii. Number of national locations

36 locations (including 3 data centers). Please refer complete list of locations available on the Company's website at https://www.wipro.com.

Markets served by the Company – Local/State/ National/ International

Please refer page no. 382 of this Annual Report.

Section B: Financial Details of the Company

1. Paid up Capital

As at March 31, 2021, the paid up equity share capital of the Company stood at ₹10,958,277,110 consisting of 5,479,138,555 equity shares of ₹2 each.

2. Total Turnover

For the financial year 2020-21, the total turnover of the Company on a consolidated basis was ₹619,430 million.

3. Total profit after taxes

For the financial year 2020-21, the net profit of the Company on a consolidated basis was ₹ 108,680 million.

Total spending on Corporate Social Responsibility (CSR) as percentage of profit after tax

Please refer to the Corporate Social Responsibility Report for the year from page nos. 114 to 118 of this Annual Report.

List of activities in which expenditure in 4 above has been incurred:-

Please refer to the Corporate Social Responsibility Report for the year from page nos. 114 to 118 of this Annual Report.

Section C: Other Details

Does the Company have any Subsidiary Company/ Companies?

The Company has subsidiaries as on March 31, 2021. Please refer the complete list from page nos. 292 to 295 of this Annual Report.

Do the Subsidiary Company/Companies participate in the BR Initiatives of the parent company? If yes, then indicate the number of such subsidiary company(s).

As the BR Initiatives of the Company are run at global level, the subsidiaries do participate in the BR Initiatives.

3. Do any other entity/entities (e. g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company? If yes, then indicate the percentage of such entity/entities? [Less than 30%, 30-60%, More than 60%]

Yes, less than 30%.

Section D: BR Information

1. Details of Director responsible for BR

a) Details of the Director responsible for implementation of the BR policy/policies

The Board Governance, Nomination and Compensation Committee is responsible for the implementation of the CSR policy. Please refer page no. 129 of this Annual Report.

b) Details of the BR head

DIN (if applicable)	Not applicable
Name	Anurag Behar
Designation	Chief Sustainability Officer
Telephone No.	080 28440011
Email id	anurag.behar@wipro.com

Principle-wise (as per NVGs) BR Policy/policies (Reply in Y/N)

a) Do you have a policy /policies for:

• **Principle 1:** Yes. Wipro has a policy on Ethics, Transparency and Accountability. Our Code of Business Conduct (COBC) is applicable to our customers, suppliers, partners, competitors, employees and other stakeholders, which is available at

https://www.wipro.com/content/dam/nexus/en/investor/corporate-governance/policies-and-guidelines/ethical-guidelines/code-of-business-conduct-and-ethics.pdf.

- Principle 2: Yes. Our Policy on Ecological Sustainability is available at https://www.wipro.com/content/dam/nexus/en/sustainability/pdf/ecological-sustainability-policy.pdf.
- Principle 3: Yes. Wipro's COBC and policy on Health and Safety is available at https://www.wipro.com/content/dam/nexus/en/sustainability/pdf/health-and-safety-policy.
 pdf.
- Principle 4: Yes. Policy on Corporate Social Responsibility is available at https://www.wipro.com/content/dam/nexus/en/investor/corporate-governance/policies-and-guidelines/ethical-guidelines/12773-policy-on-corporate-social-responsibility.pdf.
- **Principle 5:** Yes. Wipro's COBC addresses principles of Human Rights as per the principles of the UN Global Compact and is available at

https://www.wipro.com/content/dam/nexus/en/sustainability/pdf/Human-Rights-Policy.pdf.

 Principle 6: Yes. Our Policy on Ecological Sustainability.

- **Principle 7:** There is no distinct policy on public advocacy. However, refer to human capital (page nos. 80 to 86), natural capital (page nos. 70 to 79) and social & relationship capital (page nos. 59 to 69) for our engagements through various organizations on material issues.
- Principle 8: Wipro does not have a separate policy. However, these aspects are covered in the COBC, the Ecological Sustainability Commitment and policy on Corporate Social Responsibility.
- **Principle 9:** Yes. Wipro's COBC covers this.
- b) Has the policy being formulated in consultation with the relevant stakeholders?

Yes, for all principles.

- Does the policy conform to any national/ international standards? If yes, specify? (50 words)
 - Principle 1: Yes. Wipro's COBC subscribes to the Foreign Corrupt Practices Act of USA. Our financial reporting, internal controls and procedures and disclosures are in compliance with Generally Accepted Accounting Principles (GAAP) and International Financial Reporting Standards (IFRS).
 - **Principle 2:** Yes. Wipro has been following the ISO 14001 Standard and Guidelines for our Environmental Management System. For designing our Green Buildings, we have adhered to the international Leadership in Energy and Environmental Design (LEED) standard.
 - **Principle 3:** Yes. We are certified against ISO 45001 Standard across our key locations.
 - Principle 4: Yes. We carry out assurance against Global Reporting Initiative (GRI), IIRC and TCFD recommendations which have a key stakeholder engagement requirement.
 - **Principle 5:** The Human Rights policy is guided by UN Global Compact, UNDHR and the ILO Declaration. Wipro also supports the UN guiding principles on Business and Human Rights.
 - Principle 6: Yes. Our Environmental Management System is based on the ISO 14001 Standard and the Green Buildings complies with the international LEED standard

- Principle 7: Not Applicable
- Principle 8: Yes. We subscribe to the UN Global Compact principles. We also disclose details of our programs and key outcomes as part of UNGC Communication on Progress.
- **Principle 9:** Yes. We subscribe to the UN Global Compact principles with respect to this principle.
- d) Is the policy being approved by the Board? If yes, has it been signed by MD/owner/CEO/ appropriate Board Director?
 - Principle 1: Yes. The COBC is approved by our Board of Directors and endorsed by our Chairman.
 - Principle 2: Yes. The Policy on Ecological Sustainability is approved by the Board of Directors and has been signed by the Chief Executive Officer and Managing Director.
 - Principle 3: Yes. The COBC is approved by the Board of Directors. Wipro Global Statement on Health and Safety has been signed by the President & Chief Human Resources Officer.
 - Principle 4: Yes. The COBC is approved by our Board of Directors and endorsed by our Chairman. The Policy on Corporate Social Responsibility is approved by the Board of Directors.
 - Principle 5: Yes. The COBC is approved by our Board of Directors and endorsed by our Chairman. The Human rights policy is endorsed by the Board.
 - Principle 6: Yes. The COBC is approved by our Board of Directors and endorsed by our Chairman. The Policy on Ecological Sustainability has been signed by the Chief Executive Officer and Managing Director.
 - Principle 7: Not Applicable.
 - Principle 8: Yes. The Policy on Corporate Social Responsibility (CSR) is approved by the Board of Directors. The COBC is approved by our Board of Directors and endorsed by our Chairman. The Policy on Ecological Sustainability is approved by the Board and has been signed by the Chief Executive Officer and Managing Director.

 Principle 9: Yes. The COBC is approved by our Board of Directors and endorsed by our Chairman. The Policy on Ecological Sustainability is approved by the Board of Directors and has been signed by the Chief Executive Officer and Managing Director.

e) Does the Company have a specified committee of the Board/Director/Official to oversee the implementation of the policy?

The Board Governance, Nomination and Compensation Committee oversees the implementation of policies and initiatives related to CSR. The CSR policy is available at https://www.wipro.com/content/dam/nexus/en/investor/corporate-governance/policies-and-guidelines/ethical-guidelines/12773-policy-on-corporate-social-responsibility.pdf.

f) Indicate the link for the policy to be viewed online. COBC-

https://www.wipro.com/content/dam/nexus/en/investor/corporate-governance/policies-and-guidelines/ethical-guidelines/code-of-business-conduct-and-ethics.pdf.

Policy on Health and Safety-

https://www.wipro.com/content/dam/nexus/en/sustainability/pdf/health-and-safety-policy.pdf.

Policy on Ecological Sustainability-

https://www.wipro.com/content/dam/nexus/en/sustainability/pdf/ecological-sustainability-policy.pdf.

Policy on Corporate Social Responsibility-

https://www.wipro.com/content/dam/nexus/en/investor/corporate-governance/policies-and-guidelines/ethical-guidelines/12773-policy-on-corporate-social-responsibility.pdf.

Policy on Human Rights-

https://www.wipro.com/content/dam/nexus/en/sustainability/pdf/Human-Rights-Policy.pdf.

GRI Report FY 2019-20

https://www.wipro.com/content/dam/nexus/en/sustainability/sustainability_reports/wiprosustainability-report-2019-20.pdf.

g) Has the policy been formally communicated to all relevant internal and external stakeholders?

Yes, the policies have been formally communicated

to internal and external stakeholders. They are available online for all stakeholders to refer to in the links mentioned earlier.

h) Does the Company have in-house structure to implement the policy/policies?

Yes, for all principles, although Wipro does not have a policy on public policy and advocacy. The sustainability organization and government relations group oversees the public policy initiatives.

i) Does the Company have a grievance redressal mechanism related to the policy/policies to address stakeholders' grievances related to the policy/ policies?

Yes, for all principles.

Dedicated email address (ombuds.person@wipro.com) has been created to facilitate receipt of complaints and for ease of reporting. All employees and stakeholders can also register their concerns through web-based portal at https://www.wipro.com/investors/corporate-governance/#WiprosOmbudsProcess.

Analyst and Investors provide regular feedback through media, interviews and ratings. Employees have multiple channels for grievance redressal.

Suppliers can provide feedback either through the ombuds process, helpline, helpdesk or forums like the annual supplier meet.

Customers have multiple channels for raising grievances—account managers, client engagement managers, the customer advocacy group and through independently administered satisfaction surveys. There are ongoing, project based and annual feedbacks from our Customers.

j) Has the Company carried out independent audit/ evaluation of the working of this policy by an internal or external agency

We have a program which covers verification against frameworks like ISO 14001, ISO 45001, ISO 27001 and corporate reporting frameworks like GRI, IIRC, TCFD throughout the year.

Internal Audit Function: The internal audit function carries out an audit of processes and practices across functions of the organization using the COBC as the guideline.

3. Governance related to BR

Indicate the frequency with which the Board of Directors, Committee of the Board or CEO assess the BR performance of the Company. Within 3 months, 3-6 months, Annually, More than 1 year.

Quarterly.

Does the Company publish a BR or a Sustainability Report? What is the hyperlink for viewing this report? How frequently it is published?

Wipro's Annual Report includes an articulation of the 9 NVG 2011 principles. We also publish an annual Sustainability Report which is available at https://www.wipro.com/sustainability-archive/.

Section E: Principle-wise performance

Principle 1

- 1.1 Does the policy relating to ethics, bribery and corruption cover only the Company? COBC extends to the Group/ Joint Ventures/ Suppliers/Contractors/NGOs/Others?
 - Yes, COBC extends to all.
- 1.2 How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management? If so, provide the details thereof, in about 50 words or so.
 - Please refer page no. 93 of this Annual Report.

Principle 2

2.1 List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.

Our work in the space of IT services and consulting includes cloud based services, managed services, internet of things, infrastructure services and digital offerings, all of which fundamentally are premised on improving resource efficiency and reducing environmental footprint. We work in the domains of health care and life sciences, government services, banking, transportation, energy and natural resources, helping enhance provisioning of services across all sections of the society.

- 2.2 For each such product, provide the following details in respect of resource use (energy, water, raw material etc.) per unit of product (optional): Reduction during sourcing/production/distribution achieved since the previous year throughout the value chain, Reduction during usage by consumers (energy, water) that has been achieved since the previous year?
 - 1) Wipro offers a range of IT services and solutions like

- cloud based services, managed services, internet of things, digital offerings which significantly help improve process efficiency and business outcomes for our customers. All these solutions directly or indirectly also improve the environmental impacts for our customers. However, due to the nature of our services, it is difficult to quantify.
- The natural capital valuation study (refer page no. 79) and the green initiatives in ICT hardware procurement cover initiatives across the value chain.
- 2.3 Does the Company have procedures in place for sustainable sourcing (including transportation)? If yes, what percentage of your inputs was sourced sustainably? Also, provide the details thereof, in about 50 words or so.

Green Procurement program for ICT Hardware and Electronic End of Life as part of which we sourced more than 108,400 Electronic Product Environmental Assessment Tool (EPEAT) registered electronic products in calendar year 2019.

Please refer page no. 63 of this Annual Report.

2.4 Has the Company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work? If yes, what steps have been taken to improve their capacity and capability of local and small vendors?

Local Procurement: Wipro encourages sourcing from the local economy. Local sourcing reduces costs, provides local employment benefits and reduced environmental footprint in sourcing.

Please refer page no. 62 of this Annual Report.

2.5 Does the Company have a mechanism to recycle products and waste? If yes, what is the percentage of recycling of products and waste (separately as <5%, 5-10%, >10%). Also, provide the details thereof, in about 50 words or so.

Please refer page nos. 76 to 78 of this Annual Report.

Principle 3

3.1 Please indicate the total number of employees.

Please refer page no. 15 of this Annual Report.

3.2 Please indicate the total number of employees hired on temporary/contractual/casual basis.

Please refer page no. 15 of this Annual Report.

3.3 Please indicate the number of permanent women employees.

Please refer page no. 15 of this Annual Report.

3.4 Please indicate the number of permanent employees with disabilities

Please refer page no. 15 of this Annual Report.

3.5 Do you have an employee association that is recognized by management?

Please refer page no. 85 of this Annual Report.

3.6 What percentage of your permanent employees are members of this recognized employee association?

Please refer to page no. 85 of this Annual report.

3.7 Please indicate the number of complaints relating to child labor, forced labor, involuntary labor, sexual harassment, in the last financial year, and those that are pending, as on the end of the financial year.

Please refer page no. 93 of this Annual Report.

- 3.8 What percentage of your under mentioned employees were given safety & skill up-gradation training in the last year?
 - 1. Permanent Employees
 - 2. Permanent Women Employees
 - 3. Casual/Temporary/Contract employees
 - 4. Employees with disability

Safety training is provided to 100% of the employees.

For information on skill up-gradation training, please refer page nos. 82 to 83 of this Annual Report.

Principle 4

4.1 Has the Company mapped its internal and external stakeholders?

Yes.

- 4.2 Out of the above, has the Company identified the disadvantaged, vulnerable & marginalized stakeholders?
 Please refer page nos. 63 to 64 of this report.
- 4.3 Are there any special initiatives undertaken by the Company to engage with the disadvantaged, vulnerable and marginalized stakeholders? If so, provide the details thereof, in about 50 words or so.

Please refer page nos. 63 to 64 of this Annual Report.

Principle 5

5.1 Does the policy of the Company on human rights cover only the Company or extend to the Group/Joint Ventures/Suppliers/Contractors/ NGOs/Others?

Human Rights policy extends to the Group/Joint Ventures/Suppliers/Contractors/NGOs/others.

5.2 How many stakeholder complaints have been received in the past financial year, and what percentage was satisfactorily resolved by the management?

Please refer page no. 93 of this Annual Report.

Principle 6

6.1 Does the policy related to Principle 6 cover only the Company or extends to the Group/Joint Ventures/ Suppliers/Contractors/NGOs/others.

Yes, it extends to all.

6.2 Does the Company have strategies/initiatives to address global environmental issues such as climate change, global warming, etc.? Yes/No. If yes, please give hyperlink for the webpage, etc.

Yes. Please refer page nos. 70 to 79 of this report. https://www.wipro.com/investors/annual-reports/.

6.3 Does the Company identify and assess potential environmental risks?

Yes. Please see page nos. 70 and 79 in Natural Capital section of this report.

- 6.4 Does the Company have any project related to Clean Development Mechanism? If so, provide the details thereof, in about 50 words or so. Also, if yes, whether any environmental compliance report has been filed?
 No.
- 6.5 Has the Company undertaken any other initiatives onclean technology, energy efficiency, renewable energy, etc.? Yes/No. If yes, please give hyperlink for the web page, etc.

Yes. Please refer page nos. 70 to 79 of this report. https://www.wipro.com/investors/annual-reports/.

6.6 Are the emissions/waste generated by the Company within the permissible limits given by CPCB/SPCB for the financial year being reported?

Yes

6.7 Number of show cause/legal notices received from CPCB/SPCB which are pending (i.e., not resolved to satisfaction) as on end of Financial Year.

None.

Principle 7

7.1 Is your Company a member of any trade and chamber or association? If yes, name only those major ones that your business deals with.

We are members of industry and business forums in countries where we have significant operations. Business Round Table (BRT), U.S. Chamber of Commerce (USCC) and Global Business Alliance (GBA) are the top three by financial contribution. The total contribution made to BRT, USCC, GBA is \$287,500 during FY20-21.

7.2 Have you advocated/lobbied through the above associations for the advancement or improvement of public good? Yes/No. If yes, specify the broad areas (Governance and Administration, Economic Reforms, Inclusive Development Policies, Energy Security, Water, Food Security, Sustainable Business Principles, Others).

Yes. Through Industry forums and networks in India, we work on a range of issues related to sustainability and community aspects- including energy, water, green buildings, biodiversity, waste management among others. We also support flexibility in movement of labor.

Principle 8

8.1 Does the Company have specified programs/ initiatives/ projects in pursuit of the policy related to Principle 8? If yes, provide the details thereof.

Yes. Please refer page nos. 63 to 64 of this Annual Report.

8.2 Are the programs/projects undertaken through an inhouse team/own foundation/external NGO/ government structures/any other organization?

Wipro partners with non-governmental organizations working on the areas of our focus.

8.3 Have you done any impact assessment of your initiative?

We do extensive due diligence of our partners and monitor and evaluate progress/outcomes during the course of the program, and on a quarterly basis with the Chairman.

8.4 What is your Company's direct contribution to community development projects- Amount in INR and the details of the projects undertaken.

Please refer page nos. 14 to 15 and 63 to 64 of this Annual Report.

8.5 Have you taken steps to ensure that this community development initiative is successfully adopted by the community? Please explain in 50 words or so.

The nature of the programs supported by Wipro ensures successful adoption by communities. Also, Wipro works with organizations which has a good connect and presence in the local communities.

For more details, please refer page nos. 63 to 64 of this Annual Report.

Principle 9

9.1 What percentage of customer complaints/ consumer cases are pending as on the end of financial year?

We do not have any complaint relating to violation of this principle. However, we would have some customer related commercial disputes and litigations in the normal course of business.

9.2 Does the Company display product information on the product label, over and above what is mandated as per local laws? Yes/No/N.A./remarks (additional information).

Not Applicable.

9.3 Is there any case filed by any stakeholder against the Company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behavior during the last five years and pending as on end of financial year? If so, provide the details thereof, in about 50 words or so.

Not Applicable.

9.4 Did your Company carry out any consumer survey/ consumer satisfaction trends?

Please refer page nos. 14 and 60 to 63 of this Annual Report.