

# Global Policy for Prevention of LGBTQ+ Discrimination

### Purpose

This policy ensures that all people have an equal right to live which is free from violence, persecution, discrimination, and stigma. It also aims to provide members of the Lesbian, Gay, Bisexual, Transgender, Queer or Questioning, and more (LGBTQ+) community with a work environment devoid of discrimination, bullying, and harassment while promoting respect and equal treatment.

## Scope and Applicability

The policy applies to all allegations of discrimination at the 'workplace', which includes all places visited by an employee on the Wipro premises, transportation in any mode provided by Wipro, place of stay and work, venue of work-related events, customer sites or locations, and work-related venues for entertainment and leisure. Wipro holds itself to the highest standards and abides by local laws as applicable. In the absence of local laws protecting the LGBTQ+ community, Wipro will abide by its internal rules against discrimination.

# **Policy Details**

#### SPIRIT OF THE POLICY

At Wipro, we strive to promote equality through the prevention, elimination, and redressal of LGBTQ+ discrimination in the workplace.

This policy aims to:

- Encourage employees to actively prevent LGBTQ+ discrimination, bullying, or harassment by understanding the contribution of each member to ensure a healthy work environment.
- Prohibit employees from committing any form of discrimination, bullying, or harassment against LGBTQ+ employees, whether openly identifying themselves as LGBTQ+ or assumed to be LGBTQ+.
- Assure all LGBTQ+ employees that their concerns will be resolved by Wipro.
- Take steps to ensure compliance with all LGBTQ+ discrimination laws in all relevant geographies.

#### WHAT IS LGBTQ+ DISCRIMINATION?

LGBTQ+ discrimination includes actions taken based on gender identity or expression, sexual orientation, or any unwelcoming verbal, non-verbal, or physical conduct that is offensive, demeaning, humiliating, derogatory, or any other inappropriate behavior that fails to respect the dignity of an employee openly identifying as LGBTQ+ or assumed to be LGBTQ+. An act or conduct can be categorized as discrimination if:

- It has the purpose or effect of violating the dignity of an LGBTQ+ employee based on their sexual orientation, or gender identity, or its expression.
- It has the purpose or effect of creating an intimidating, hostile, or offensive work environment.
- It has the purpose or effect of unreasonably interfering with an LGBTQ+ employee's work performance.
- It otherwise adversely affects an LGBTQ+ employee's employment or career pursuit opportunities.

#### **PROHIBITION OF LGBTQ+ DISCRIMINATION**

- Discrimination at the workplace adversely affects a productive 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. Such action will invite disciplinary action, including termination, subject to local laws.

#### PREVENTION OF LGBTQ+ DISCRIMINATION

Aligned with the code of business conduct and applicable laws, Wipro ensures all reasonable steps are taken for the prevention of LGBTQ+ discrimination at work.

#### Mode of Registering Complaint

Any employee of the LGBTQ+ community can report discrimination to their managers or someone else within the employee's chain of command, or a member of HR, any employee, contractor, vendor, vendor employee, or any other person acting in good faith on their behalf if they feel subjected to discrimination because of their sexual orientation, or gender identity, or its expression.

The employee has the option to seek formal intervention directly from Ombuds or the Designated Complaint Officer. To do so:

- Visit the following path to contact them through the intranet: The Dot >> Apps >> Ombuds Process. They can also do so through the internet by visiting <u>www.wiproombuds.com</u> or can write the grievance by email at <u>ombuds.person@wipro.com</u>.
- The concern shall be investigated by the designated Ombudsperson. 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.

In India, as per the Transgender Persons (Protections of Rights) Act, 2019, "every establishment shall designate a person to be a complaint officer to deal with the complaints relating to violations of the provisions of this Act." Employees may write to the Designated Complaint Officer, i.e., the Global LGBTQ+ Charter Lead, at <u>LGBTQ.Support@wipro.com</u>.

#### **EMPLOYEE RIGHTS AND OBLIGATIONS**

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

- Familiarize themselves with the policy and complete any training required. In some countries or states, training is mandated by law.
- Cooperate with any measures introduced to promote equal opportunities at the workplace.
- Respect the sensitivities of others.
- Never take discriminatory actions or decisions contrary to the letter and spirit of this policy.
- Offer information and support to any person who is being discriminated against. Report any instance of LGBTQ+ discrimination to the appropriate persons.

- Maintain confidentiality as needed for any aspect of an inquiry to protect the employee belonging to the LGBTQ+ community.
- Be aware that an employee has the right to file a complaint of unlawful discrimination under the law with local authorities, including the police.
- Be aware that if an employee chooses to file such a complaint with the police authorities, the Ombuds or the Designated Complaint Officer will provide all reasonable assistance as required under the law.
- Be aware of and follow local customs with respect to people's interactions at the workplace.

# CONTINUOUS SENSITIZATION FOR PREVENTION OF DISCRIMINATION, BULLYING, AND HARASSMENT.

Wipro will endeavor to sensitize and train its employees on the prevention of LGBTQ+ discrimination. Wipro also encourages all employees to educate themselves and their teams using these on-demand resources:

- Pride at Wipro microsite on The Dot (here)
- Wipro Pride Social on The Dot (here)
- 'Championing LGBTQ+ Inclusion in the Workplace' e-learning module on WiLearn (here)
- Community events, open both to LGBTQ+ colleagues and allies (here)
- Other available resources

#### NO RETALIATION

Retaliation can be any action that could discourage a worker from coming forward to make or support an LGBTQ+ discrimination claim.

- Retaliatory action need not be job-related or occur in the workplace for it to constitute unlawful retaliation.
- Even if the alleged LGBTQ+ discrimination does not violate the law, the individual is protected from retaliation if they have acted in good faith and believe that the practices were unlawful.
- Wipro shall not tolerate 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 an LBGTQ+ discrimination investigation shall be subjected to disciplinary action, up to and including termination.
- All employees or consultants working at Wipro who believe they have been subjected to such retaliation should inform their supervisor, manager, or Wipro's Ombuds.

However, the retaliation provision is not intended to protect persons making false accusations of LGBTQ+ discrimination.



Wipro Limited Doddakannelli Sarjapur Road Bengaluru – 560 035 India

Tel: +91 (80) 2844 0011 Fax: +91 (80) 2844 0256 wipro.com 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 nearly 245,000 employees and business partners across 65 countries, we deliver on the promise of helping our clients, colleagues, and communities thrive in an ever-changing world.

For more information, please write to us at info@wipro.com