



GLOBAL COMPANY POLICY

OMBUDS POLICY

Version 6.0 (May 2021)

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1. INTRODUCTION AND SPIRIT OF THE POLICY

Wipro Limited including subsidiaries and affiliate companies (“Wipro” or the “Company”) is committed to the highest standards of openness, probity and accountability.

Section 177(9) of the Companies Act, 2013 (India) and regulation 22 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 mandates that every listed company establish a Whistleblower mechanism.

Wipro’s policy for dealing with Whistleblowers’ concerns has been in existence since April 15, 2003.

Employees are often the first to recognize any concern within the Company. However, they may ignore such concerns or dismiss them as mere suspicions or disloyalty to their colleagues, managers or to the Company itself. Also, they may not be aware of the appropriate procedure or the internal authority to whom the concern must be raised.

The Ombuds Policy has been introduced by the Company to enable employees and other individuals associated with the Company to not overlook any concern but instead raise it at an early stage and in the right manner, without fear of retaliation, victimization, subsequent discrimination or disadvantage at workplace.

As is well known, Wipro does not tolerate any malpractice, impropriety, abuse or wrongdoing and encourages employees to come forward and voice their concerns. **Wipro assures that such concerns would be enquired into by designated persons independently and fairly.**

2. APPLICABILITY OF THE POLICY AND ITS EFFECTIVE DATE

This Policy applies to all employees of the Company including those who are on probation and notice period and is effective from April 15, 2003. It also applies to employees of vendors and service providers, contract employees, clients, retainers, consultants, trainees and interns. To clarify, any of these persons who raise concerns under this Policy are referred to as “complainants” in this Policy.

Any federal, state, and local laws and regulations would supersede any of the Ombuds policy guidelines in case of any conflict.

3. ASSURANCES UNDER THE POLICY

If a complainant raises a concern under this Policy, he/she will not be under any risk in the form of retribution or retaliation including the risk of his/her job. If one acts in good faith, it does not matter if the concern was raised by mistake.

The Company will not tolerate any harassment or victimization (including informal pressures) against any complainant who raises a genuine concern and will take appropriate action to protect the complainant when he/she raises a concern in good faith.

If the complainant raising a concern requests that his/her identity should not be disclosed, the Company will not disclose it without his/her consent. However, please note that to conduct effective investigation complainant's identity may be required in certain cases and in its absence, Company may be unable to resolve the complainant's concern. In such situations complainant shall be informed that his/her identity is required to be revealed and only upon the complainant's consent his/her identity shall be revealed and investigation will be initiated.

However, under any circumstance if a complainant believes that he/she has been retaliated against for disclosing any concern, he/she may file a written complaint to the Chief Ombudsperson to seek remedy.

4. POLICY AND PROCEDURE FOR DISCLOSURE, ENQUIRY AND DISCIPLINARY ACTION

4.1 What constitutes malpractice, impropriety, abuse or wrongdoing?

Concern can be in respect of a variety of issues and some are listed below. This list is intended to illustrate the types of issues that may be raised under this Policy:

- Any unlawful act, whether criminal (e.g. theft) or a breach of the civil law (e.g. slander or libel).
- Breach of any Policy of Code of Business Conduct ("COBC") adopted by the Company from time to time.
- Breach of Company's Code of conduct to regulate, monitor and report trading by designated persons and their immediate relatives ("Code"), including any incident involving leak or suspected leak of unpublished price sensitive information.
- Health and safety risk observed, including risk to the public as well as other persons (e.g. faulty electrical equipment).
- Abuse including physical, sexual, psychological or financial abuse, exploitation or neglect.
- Damage to the environment (e.g. pollution).
- Fraud and corruption (e.g. to solicit or receive or offer or promise any gift/reward as a bribe).
- Any instance of failure to comply with legal or statutory obligation either for and on behalf of the Company or in any personal capacity in the course of discharging duties of the Company.
- Any instance of any sort of financial malpractice or wrongful accounting practice.
- Conflict of interest.
- Abuse of power (e.g. bullying or workplace harassment).
- Any other unethical or improper conduct or a conduct that is in violation of any Policy of the Company.

4.2 Limitation of time to raise a concern

A complainant raising a concern is required to share all available and relevant information regarding the concern not later than 3 (three) months from the date of his/her knowledge of the concern. Please note that sharing of complainant's personal information shall be considered as a consent from the complainant to process such information if required unless the complainant has specifically requested that the details should not be disclosed without his/ her specific consent.

4.3 To whom should a concern be raised?

The concern may be raised through e-mail ombuds.person@wipro.com, or through intranet “MyWipro →App Store →Information →Ombuds Process” or through internet at www.wiproombuds.com

Additionally, a complainant may raise a concern through the Hotline where the concern can be made through a telephone call or online in a number of global languages. Details of the Hotline are available at **Annexure A**.

4.4 Who will investigate into the concern?

The concern shall be investigated by the Designated Ombudsperson. Where a Country specific regulatory requirement mandates investigation by a person located in the country, Chief Ombudsperson would be entitled to delegate the powers of Designated Ombudsperson to a senior member of another function located in the relevant Country to investigate any specific concern subject to neutrality of the role with respect to the concerned issue and also subject to compliance to the law of the land. Such delegation would be through a documented communication with the reasoning for the decision specified in the document and the person so delegated would be considered the Designated Ombudsperson specific to that particular investigation and shall follow the policy and process as laid down for a Designated Ombudsperson.

4.5 Procedure for handling concerns raised

- Once a concern is raised by a complainant, the same is taken up for inquiry.
- The complainant may be contacted for more details.
- The investigation is neutral and the report contains facts, evidences and context of the investigation.
- A decision is made by the appropriate authority on the action to be taken basis the findings of the investigation.

The complainant raising the concern must provide sufficient and relevant information to start the investigation. In case the complainant is non-responsive for more than 15 days, the concern may be closed without further action.

The Company will keep the complainant informed on the completion of the inquiry process

All discussions and information associated with the Ombuds process must be kept confidential by the individuals associated with the concern. Breach of this will result in disciplinary action against the individual, which may lead to termination

4.6 Appeal

If the complainant or the person complained against is not satisfied with the decision taken on a concern, he/she can file an appeal with the Chief Ombudsperson and the same needs to be reviewed by a member of the compliance committee, other than the Chief Ombudsperson.

Please note that investigation which lead to a decision of termination are reviewed and approved by the Compliance Committee as part of the completion of the inquiry process and hence are not subject to further appeal.

4.7 Anonymous complaints

The Ombudspersons will take into consideration all anonymous complaints for appropriate investigation based on the following factors:

- The seriousness of the concern raised;
- The credibility of the concern;
- The likelihood of confirming that the allegation is raised through reliable sources; and
- The ability to investigate into anonymous complaints.

However, the Company encourages complainants raising a concern to provide his/her name to facilitate addressing the concern more effectively and expeditiously.

4.8 Untrue allegations

If a complainant makes an allegation in good faith, which is not confirmed by subsequent investigation, no adverse action will be taken against that complainant. In making a disclosure the complainant should exercise due care to verify the accuracy of the information provided in the complaint. Disciplinary action may be taken against an employee who makes *mala fide* or frivolous allegations.

4.9 Maintaining confidentiality of the concern as well as the disclosure

The complainant raising a concern or the persons to whom the concern is made or any person involved in the investigation including witnesses shall maintain confidentiality and shall not disclose / discuss the concern or the internal proceedings with any third party.

The obligation of confidentiality does not however restrain an individual from disclosing the information as part of legal proceedings initiated by the individual or in response to any statutory or judicial process in accordance with the law.

5. PENALTIES UNDER POLICY

If a person, against whom the concern is raised, is found guilty, then the Company shall take appropriate action as per the Company's disciplinary policy.

6 AMENDMENT HISTORY

Amendment Date	Policy Version	Author	Approved By:	Nature of Changes
13-Jan-12	2.7	Asha L	Alexis Samuel	Changes updated in contact database of Ombuds team
01-August-12	2.71	Asha L	Alexis Samuel	Changes updated in contact database of Ombuds team
1-May-13	2.8	Asha L	Ravi Kiran Vadapally	Changes updated in contact database of Ombuds team
1-Sep-13	2.9	Asha L	Inderpreet Sawhney	Changes updated in contact database of Ombuds team
9-Oct-13	3.0		Inderpreet Sawhney	Removal of reference to BU Compliance Committee, Wipro Infrastructure Engineering, Wipro Consumer Care and Lighting and other procedural changes in the review process
28-Jan-14	4.0		Inderpreet Sawhney	Changes updated in contact data base and handling the concern and its closure
9-Oct-14	5.0		Inderpreet Sawhney	Thoroughly reviewed the Policy and introduced revised appellate process
01-Aug-15	5.1		Inderpreet Sawhney	Changes updated in contact database of Ombuds team
31-Jan-17	5.2		Inderpreet Sawhney	Policy changes / clarifications provided, Changes updated in contact database of Ombuds team
19-Apr-18	5.3		Bhavani Padmanabhan	Wipro Logo updated
22-Mar-19	5.4		Bhavani Padmanabhan	Changes introduced to provide for reporting of instance(s) of leak or suspected leak of unpublished price

				sensitive information.
09-Dec-19	5.5		Bhavani Padmanabhan	New scope applicable for raising Ombuds concerns in Australia
13-May-21	6	Sunando Bhattacharjea	Bhavani Padmanabhan	Amendment on applicability Authority of enquiry

Annexure A (UPDATED- With new hotline numbers)

International/Global dialing instructions

Calls to our hotline is free of cost.

1. Check for any specific dialing restrictions for your country.
2. Ensure the telephone you are using have international dialing capability.
3. Look up your country in the chart below to find your Toll-free telephone number(s).
4. If your country does not appear in the list, calls to the call center will incur international charges. Please consider using the Online reporting option to log your concern.
5. Dial the number exactly as it appears in the table

International Toll-free Service (ITFS) and Global International Service (GIS)

1. Dial your country/carrier-specific telephone number.
2. You will hear a welcome message and will get an opportunity to proceed in your desired available language. You will then hear a recorded message in your selected language explaining the call process. You will be given the option to report in English or in any one of the languages supported by us.
3. The first person who speaks to you will be an English-speaking interviewer. He or she will bring into the conference call a translator who speaks your language to assist you in reporting your concern. This may take a few minutes. Please be patient.

Egypt and Romania

1. You have the option to reverse the charges for the call. Dial your telephone operator service and ask the operator to reverse the charges to: 604-922-5953 (Canadian number)

Dialing Instructions

Country calling from:	Dialing Instructions	Additional details
Argentina	00-800-2002-0033.	Not available from Mobile Phone
Australia	0011-800-2002 -0033	
Austria	00-800-2002-0033	
Brazil	0021-800-2002-0033	
China	00-800-2002-0033	Not available from Mobile Phone

Only accessible from a Land line provided by China Telecom for the provinces of:

Country calling from:	Dialing Instructions	Additional details
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- Jiangshu
- Zhejiang
- Fujian
- Guangdong
- Guangxi
- Guizhou
- Hunan
- Hubei
- Anhui
- Sichuan
- Tibet
- Xinjiang
- Chongqing
- Fengkai
- Funing
- Nanping
- Suzhou
- Shanghai.

The number must be dialed from a Land line provisioned through China Netcom, In the following provinces:

- Shandong
- Henan
- Liaoning
- Helongjiang
- Jilin
- Hebei
- Shanxi

Finland	990-800-2002-0033	
France	00-800-2002-0033	Please note that this number is only available from Metropolitan France and Corsica
Germany	00-800-2002-0033	
Germany	00-800-2002-0033	
India	000-800-100-7980	<p>Please note that this number is not accessible from the following carriers:</p> <ul style="list-style-type: none"> • BSNL Mobile • TTSL Prepaid

Country calling from:	Dialing Instructions	Additional details
Indonesia	0018030208158 - Customers of PT Indosat 0078030208158 - Customers of PT Telkom	
Japan	010-800-2002-0033 - May be dialed by members on the KDDI, C&W, IDC, Softbank/JT, and NTT. No access from IP phones except from KDDI IP phones. 001-010-800-699-61111 - From a KDDI cell phone 0033-010-800-699-61111 - From an NTT cell phone please dial	
Malaysia	00-800-2002-0033	
Mexico	001-800-514-8714	
Netherlands	00-800-2002-0033	Restrictions may apply to mobile users other than those on the Vodafone, KPN, and Telfort networks.
New Zealand	00-800-2002-0033	
Philippines	00-800-2002-0033	Please note that this number is available only from landlines provisioned by PLDT.
Portugal	00-800-2002-0033	
Saudi Arabia	800-814-0491	
South Africa	00-800-2002-0033	
Sweden	00-800-2002-0033	Access only available from landlines provisioned by Telia.
Switzerland	00-800-2002-0033	
South Korea	001 or 002 or 008-800-2002-0033	
Taiwan	00-800-2002-0033	Unfortunately, access is not available from mobile phones using the KG Telecom network.
Thailand	001-800-2002-0033	

Country calling from:	Dialing Instructions	Additional details
UAE	800-0-3570-3557	
UK	00-800-2002-0033	
United States	1-866-921-6714	

Annexure B (Scope for raising Ombuds concerns for Australian Complainants)

This addendum shall be applicable only to Complaints from Australia. All other terms of the Ombuds Policy shall continue to be applicable additionally apart from this addendum.

1. Applicability:

This Policy also applies to spouse, relative and/or dependent of employees, employees of vendors, service providers, clients, and consultants.

2. Public interest disclosure and emergency disclosure:

A disclosure of information (the **public interest disclosure**) by a complainant (the **discloser**) qualifies for protection under this Policy if:

- a. the Complainant has previously made a disclosure of that information (the **previous disclosure**) that qualifies for protection under this Policy
- b. At least 90 days have passed since Complainant reported his/her concerns to ASIC or APRA, and Complainant does **not** have reasonable grounds to believe that action to address your concerns is being or has been taken.
- c. Complainant have reasonable grounds to believe that reporting his/her concerns to a journalist or parliamentarian would be in the public interest.
- d. Complainant reports his/her concerns about misconduct or an improper state of affairs or circumstances or a breach of the law to a journalist or a parliamentarian. The extent of the information disclosed is no greater than is necessary to inform the recipient about your concerns.