

# **Modern Slavery Statement**



#### Introduction

Wipro Limited and its subsidiary companies (henceforth jointly referred to as "Wipro") are committed to protecting Human Rights and prohibiting all acts of human trafficking, slavery, servitude, forced marriage, forced or compulsory labour, debt bondage, deceptive recruiting for labour or services, and child labour throughout the organization, its business and supply chain. Wipro herein elucidates its initiatives to mitigate/eradicate modern slavery and human trafficking from its business and supply chain.

#### **Overview**

#### **Organisation Structure**

Wipro headquartered in Bengaluru, India, is a leading global Information Technology (IT) consulting and business process service provider, delivering solutions to support its clients in improving efficiency. It serves clients across six continents and 67 countries, most predominantly in India, the United States and the United Kingdom.

Wipro is listed on the National Stock Exchange and Bombay Stock Exchange in India and New York Stock Exchange in the United States (NYSE: WIT, BSE: 507685, NSE: WIPRO). Wipro provides an array of IT services, which include digital strategy advisory, technology consulting, IT consulting, custom application design, development, re-engineering and maintenance, systems integration, package implementation, global infrastructure services, business process services, cloud, mobility and analytics services, research and development and hardware and software design to clients worldwide.

A company recognized globally for its comprehensive portfolio of services, strong commitment to sustainability and good corporate citizenship, Wipro has over 250,000 dedicated employees serving its vast clientele.

#### **Supply Chain Overview**

The supplier ecosystem of Wipro can be broadly categorized into two heads — the 'primary supply chain' which means extended workforce involved in core delivery of IT Services and Solutions; and product or services suppliers or 'secondary supply chain' who provide materials, equipment and end products, business support services and facility management services for our operations.

Wipro's supply chain is innately linked to its successful growth and works end-to-end to incorporate specific industry experience as well as a cross-industry perspective to help seed continuous innovation. Wipro's Central Procurement Organization has automated its supply chain management through a strategic web-based portal that covers all stages of procurement and provides end-to-end supplier on boarding across all businesses. This portal requires all prospective suppliers to register with Wipro, update their business details and to ensure their adherence to Wipro's Supplier Code of Conduct (SCOC), which is in line with its Code of Business Conduct and Ethics.

## Risks of Modern Slavery Practices

Wipro follows a risk-based assessment of its complex operation and supply chain. Wipro understands that the population, location, industry / sector, type of products / services and categories of investments involved influence the level of such risk. Wipro is committed to a continuous improvement approach that effectively responds to modern slavery risks. Wipro has a well-defined criteria to identify high risk vendors, which include the industry its vendors operate in, labour intensity, financial stability, their audit records etc.

### **Actions taken by Wipro**

#### Wipro Policies

Wipro's internal policies (Code of Business Conduct & Ethics and Supplier Code of Conduct, Ombuds Policy, Human Rights Policy, Whistle-blower Policy) and practices focus on anti-slavery and anti-human trafficking and are part of a larger effort to ensure transparency, accountability and safeguarding of Human Rights extended to its supply chain. These internal policies specify Wipro's commitment to upholding Human Rights, prohibiting slavery, servitude, forced labour, child labour and human trafficking and are available on Wipro website (https://www.wipro.com/content/dam/nexus/en/ sustainability/pdf/Human-Rights-Policy.pdf). Wipro expects all those who work with and for it including without limitation, its personnel, supply chain and contractors, to read and comply with its policy and practices.

Wipro's Code of Business Conduct and Ethics applies to all employees of Wipro. It specifically identifies and prohibits several forms of modern slavery. These include any act of human trafficking, slavery, servitude and forced or compulsory labour.

The Code of Business Conduct and Ethics also highlights and disavows the practice of child labour throughout its business and its supply chain. Beyond its own prohibition of child labour, Wipro is committed to work in a proactive manner to eradicate child labour by directly and actively contributing to best practices, including only legitimate workplace apprenticeships, internships and other similar programmes that comply with all laws and regulations.

#### **Wipro Cares Initiative**

Wipro Cares is an employee-led community initiative arm of the Wipro Foundation and engages in education, primary healthcare, and community ecology and disaster response in proximate communicates. It is a unique opportunity for Wipro employees to respond to community needs and contribute to social causes. More than 30,000 Wipro employees are currently engaged with Wipro Cares

#### **Supplier Code of Conduct**

Wipro's Supplier Code of Conduct specifically requires suppliers to ensure that their employees are hired on their own free will and that they must prohibit forced, bonded, or any other form of compulsory labour such as slavery or trafficking, transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services in all of their operations. As part of Wipro's Supplier Code of Conduct, Suppliers and their agents are required not to confiscate any identity or immigration documents, such as government-issued identification cards, passports or work permits, unless required by law.

If suppliers do not comply with the Supplier Code of Conduct, or are found to be non-compliant with anti-slavery or anti-human trafficking practices in their business, or knowingly in their supply chain, Wipro retains the right to terminate the contract for services with immediate effect, including future blacklisting of the supplier concerned taking into account the extent of non-compliance and pursue legal remedies against the supplier concerned.

Wipro also endeavours to foster an environment of open and honest communication. Suppliers are encouraged to raise concerns with respect to any suspected violations of this Code or any other specific concern arising out of their business relationship with Wipro or its officers or employees to Wipro's Ombudsperson.

# Due Diligence and Remediation Processes against Modern Slavery and Human Trafficking

As part of its due diligence initiative to identify any modern slavery, Wipro —

- conducts assessments through third party tools and reviews the reports internally prior to the on boarding of any vendor/partner.
- conducts background verification of potential employees in compliance with the local laws of the relevant country;
- retains the right to conduct independent audits of its on-boarded vendors/partners to ensure compliance with Wipro's Supplier Code of Conduct.

As part of its initiative to eliminate and further prevent modern slavery, Wipro –

- requires its vendors/partners to provide a declaration of compliance with its Supplier Code of Conduct;
- employs internal processes to ensure Wipro's employees and extended workforce are aware of and abide by Wipro's Code of Business Conduct and Ethics;
- employs whistleblowing and grievance redressal systems to encourage reporting of concerns and/or violations;
- updated its standard procurement contracts to include anti-slavery and anti-human trafficking provisions;
- operates in licensed premises strategically limited in geographical scope to ensure optimum control and supervision of the work environment;
- strives to build long standing relationships with local suppliers and customers to effectively communicate its business standards;

# Assessing Effectiveness of Wipro's Policies and Actions (specific to and as per the requirement u/ Australia's Modern Slavery Act, 2018)

During this reporting period, while Wipro continued to gain a better understanding of the modern slavery risks in Wipro's operations and supply chains, Wipro simultaneously initiated the process of developing frameworks to review the effectiveness of its actions. Highlighted below are the key performance indicators Wipro employs to measure the effectiveness of its policies and actions:

Reviewing issues reported through Wipro's Grievance Redressal and Reporting Mechanism and implementing corrective actions where required

Wipro encourages and has in place a whistleblowing process and a formal grievance redressal framework that enables everyone, including partners, contractors and employees, to raise their concerns at a single platform with complete confidentiality and has strict 'non-retaliation' policy to safeguard the interests of whistle-blowers. Wipro reviews the types of issues/ concerns reported and initiates corrective and preventive measures where required.

#### Assessing Adherence to Wipro's Values

Wipro expects its employees, supply chain personnel, contractors and all of those associated with it to adhere and comply with Wipro's values and policies. All employees provide annual declaration to this effect. Wipro's vendors are required to provide declarations of compliance with Wipro's Supplier Code of Conduct which covers various aspects of anti-modern slavery, human rights, anti-bribery and corruption etc.

#### **Training and Awareness**

Wipro offers trainings through various forums and workshops to its employees and suppliers.

# Impact of COVID-19 on Wipro's Operations and Supply Chains

Wipro recognises that the Covid-19 pandemic would result in some workers becoming more vulnerable to modern slavery. Wipro has taken multiple steps to protect vulnerable workers in their global operations and supply chains from the impacts of COVID-19.

As a response to COVID-19, Wipro activated its strong Business Continuity Plan framework that enabled it to respond to the COVID-19 crisis with agility. Majority of the workforce are enabled to work from home. Limited employees are working from campus and strong control measures have been put in place to ensure employee health and safety. Proper sanitization, availability of medical staff within the premises, appropriate social distancing has been implemented and is given utmost priority. Wipro remains resolute in its goals of employee safety, business continuity and of being a trusted partner to our customers.

Wipro's 'Digital- first' strategy has become particularly relevant in the post COVID-19 business environment and has enabled smooth functioning and effective delivery of services. Wipro has continued to maintain supplier relationships and is fostering open communication with suppliers about COVID-19 risks. Even during the pandemic, Wipro has seamlessly reached out to our suppliers.



#### Consultation

The policies and procedures outlined in this statement are uniform across all of Wipro's subsidiaries and branches. Teams across all branches and subsidiaries operate collaboratively to ensure each of Wipro's policies are appropriately enforced and upheld. Wipro continuously reviews the sufficiency and effectiveness of its policies and programs.

Pursuant to the recommendation of the Audit Committee, the Board of Directors ratified and approved the annual modern slavery statement 2023 in accordance with Australia's Modern Slavery Act 2018 and under section 54(1) of the UK Modern Slavery Act 2015, effective from September 30, 2023, as per the document circulated.

Further, the Board of Directors authorized Mr. Saurabh Govil (Chief Human Resources Officer) and Ms. Aparna C. Iyer (Chief Financial Officer) to approve any modifications to the annual modern slavery statements as required due to regulatory requirements.

Signed on the Board's behalf by:

Saurabh Govil

Chief Human Resources Officer



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#### **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 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 additional information, visit us at www.wipro.com