



WIPRO'S ANTI SLAVERY AND ANTI HUMAN TRAFFICKING POLICY STATEMENT 2021

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. Pursuant to the UK Modern Slavery Act 2015 and Australia’s Modern Slavery Act, 2018, Wipro herein elucidates its initiatives to mitigate/eradicate modern slavery and human trafficking from its business and supply chain. This Statement sets out the steps that Wipro as an organization has taken to ensure that no form of slavery and human trafficking exists in its business or supply chain.

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 has a dedicated workforce of over 200,000, serving clients across six continents. Wipro delivers winning business outcomes through its deep industry experience and a 360-degree view of ‘business through technology’, helping clients create successful and adaptive businesses. Wipro is an organization recognized globally for its comprehensive portfolio of services, strong commitment to sustainability and good corporate citizenship.

WIPRO BUSINESS

Wipro is listed in National Stock Exchange and Bombay Stock Exchange in India and New York Stock Exchange in the US. Wipro provides an array of IT services, which includes 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.

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.

ASSESSMENT OF MODERN SLAVERY RISK

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 respond to modern slavery risks. During this reporting period, given that Wipro's vast presence and highest supply spend is in India, Wipro has focused on assessing its supply chain in India. In addition to undertaking audits to ensure compliance with all labour laws by labour intensive suppliers in India, Wipro has devised an additional questionnaire focused on modern slavery risks. All suppliers are required to report the steps being taken regarding identifying the risk of modern slavery within their supply chain which will allow Wipro to better assess the potential risks of modern slavery in its own supply chain. Wipro continues with the efforts to assess the supply chain in India, considering the vast presence, and identifying the risks. Wipro will be commencing a similar assessment of other high risk markets and countries wherein Wipro has major presence.

WIPRO POLICIES

Wipro is committed on ensuring that the organization and its supply chain are free from modern slavery or human trafficking in any form. 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 intranet (<https://www.wipro.com/>). Wipro has taken and continues to take multiple actions to identify and eradicate forced labour, slavery and human trafficking in its business and supply chain. Wipro expects all those who work with and for it including without limitation, its personnel, supply chain and contractors, to read and comply with this Statement.

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. At the time of recruitment, the Suppliers must provide a written employment agreement containing terms and conditions of employment to all their employees. Suppliers and their agents must not 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 initiative to identify and eliminate any modern slavery, Wipro –

- 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;
- employs whistleblowing and grievance redressal systems to encourage reporting of concerns and/or violations;
- 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;
- conducts independent assessments through third party tools and review the reports internally prior to the on boarding of any vendor/partner;
- retains the right to conduct independent audits of its on-boarded vendors/ partners to ensure compliance with Wipro's Supplier Code of Conduct

Wipro's supplier engagement program integrates continuous evaluation, capacity building and risk management with a focus on Human Rights, labour practices like prevention of child labour and connected regulatory compliance through ongoing periodic assessments. In addition, over this reporting period, Wipro has commenced review of the standard procurement contracts to be signed with Wipro's suppliers, to include anti-slavery and anti-human trafficking clauses and Wipro has strived to engage more with its suppliers on modern slavery issues.



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 and policies to review the effectiveness of the actions Wipro was implementing or has implemented in the past and the policies Wipro has formulated and regularly updated over the years, to assess and address modern slavery risks in Wipro's operations and supply chains. While Wipro understands that any such assessment or review of Wipro's actions and policies towards identifying and addressing modern slavery risks and non-compliances is an ongoing process that Wipro is committed to continue to build upon in the upcoming reporting periods, highlighted below are few of the measures undertaken by Wipro to assess the effectiveness of Wipro's policies and actions during this reporting period:-

1. GRIEVANCE REDRESSAL AND REPORTING

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 and the independent grievance redressal body appointed within Wipro strive to remediate any concerns raised with short turnaround time.

2. ADHERENCE TO WIPRO'S VALUES

Wipro is committed and continues to exhibit zero tolerance towards modern slavery and human trafficking in its business and supply chain. Wipro expects its employees, supply chain personnel, contractors and all of those associated with it to adhere and comply with Wipro's values. The legal and compliance, human resources and central procurement organization are responsible for ensuring compliance across the organization. In furtherance to this, as highlighted above, Wipro conducts audits of its suppliers wherever required and initiates remediation steps if required. During this reporting period, Wipro engaged with its suppliers to assess their compliance with anti-slavery and anti-human trafficking practices by way of a modern slavery questionnaire. While Wipro received responses from some of its suppliers, Wipro recognises that many of its suppliers may be unaware of the reporting and compliance requirements under modern slavery acts in different countries. Wipro has, therefore, initiated the development of a self-training module on modern slavery compliance for its supplier which will in turn help them answer the modern slavery questionnaire successfully. In the upcoming reporting period, Wipro will continue to engage with its suppliers on the questionnaire.

3. TRAINING AND AWARENESS

Wipro offers multiple mandatory trainings through various forums and workshops to its suppliers and employees on anti-slavery and anti-human trafficking, specifically to identify such issues in the supply



chain and respond in accordance with the applicable laws. Wipro's suppliers are also required to assess their businesses and supply chain to ensure compliance with the provisions of the Modern Slavery Act, anti-human trafficking and other Human Rights requirements as incorporated under this Statement.

An annual training and assessment is also held for all vendors and vendor employees. Aspects relating to Human Rights and Modern Slavery is covered in this training. Non-completion of this assessment within a stipulated timeline leads to the blockage of the web-based portal, hence requiring all vendor employees to mandatorily complete the training to enable access for updating attendance. Wipro has also initiated the process of implementing an annual training and certification of compliance with Wipro's Supplier Code of Conduct for its suppliers which will help Wipro in assessing their compliance with anti-slavery and anti-human trafficking practices.

IMPACT OF COVID-19 ON WIPRO'S OPERATIONS AND SUPPLY CHAIN

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. 92.5% of our workforce are enabled to work from home and we continue to service our customers. 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, we have seamlessly reached out to our suppliers reiterating our commitment to upholding of Human Rights and have sought confirmation from them on their continued compliance with our code of conduct policies.

Pursuant to the recommendation of the Audit Committee, the Board of Directors ratified and approved the annual modern slavery statement 2021 in accordance with Australia's Modern Slavery Act 2018 and under section 54(1) of the UK Modern Slavery Act 2015 effective September 28, 2021, as per the document circulated.

Further, the Board of Directors authorized Mr Deepak Acharya, General Counsel to approve any modifications to the annual modern slavery statements as required due to regulatory requirements.

Signed on the Board's behalf by:

Deepak Acharya
(General Counsel)