



Global Policy for Prevention of LGBTQ+ Discrimination



Document Control

Function	Corporate HR
Sub-function	Organization Capability
Policy Owner	Sukanya Ramachandran
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1. Purpose

This policy ensures that all people have an equal right to live, free from violence, persecution, discrimination and stigma. It 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. The policy also promotes respect and equal treatment.

1.1 Audience

All employees of Wipro Limited. This includes part-time, temporary and contractual personnel, trainees, persons on probation, and apprentices. It also includes Wipro's subsidiaries and affiliate companies, customers, vendors, consultants, third parties, people on Wipro premises, and those engaging in any business activity with and for Wipro.

1.2 Scope and Applicability

The policy applies to all allegations of discrimination at the 'workplace'. This 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. It 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.

2. Policy Details

2.1 Spirit of the policy

A workplace free from LGBTQ+ discrimination fosters belonging and psychological safety. It leads to increased productivity, innovation, and job satisfaction. Compliance with anti-discrimination laws upholds ethical responsibilities. It also safeguards financial interests. Prioritizing LGBTQ+ equality enhances brand reputation and builds trust with stakeholders. It also fosters long-term relationships and attract top talent. It improves retention rates, and foster diverse, innovative teams as well.

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.

2.2 What is LGBTQ+ discrimination?

LGBTQ+ discrimination includes any discriminatory actions undertaken, which is based on gender identity or expression, or sexual orientation. It also includes any unwelcoming verbal, non-verbal, or physical conduct that is offensive, demeaning, humiliating and derogatory. Any other inappropriate behavior that fails to respect the dignity of an employee openly identifying as LGBTQ+, or assumed to be LGBTQ+, also constitutes LGBTQ+ discrimination.

An act or conduct can be categorized as discrimination if:

- It has the purpose or the 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 adversely affects an LGBTQ+ employee's employment or career pursuit opportunities.

2.3 Prohibition of LGBTQ+ discrimination

- Discrimination at the workplace adversely affects a productive environment. It can adversely impact the health, confidence, morale and performance of those affected by it. It also includes 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. It will not be tolerated under this policy. Such action will invite disciplinary action. This may include termination, subject to local laws.

2.4 Prevention of LGBTQ+ discrimination

Aligned with the Code of Business Conduct and applicable laws, Wipro ensures that all reasonable steps are taken for the prevention of LGBTQ+ discrimination at work.

2.5 Mode of Registering Complaint

If any employee from the LGBTQ+ community feels subjected to discrimination because of their sexual orientation, or gender identity, or its expression, they may register a complaint. They may report the discrimination to their managers or someone else within the employee's chain of command, or a member of HR. They may also report the discrimination to any employee, contractor, vendor, vendor employee, or any other person acting in good faith on their behalf.

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 www.wiproombuds.com or they can communicate about the grievance by email at ombuds.person@wipro.com.
- The reported concern shall be investigated by the designated Ombudsperson. All complaints alleging a violation of this policy will be promptly and thoroughly investigated. Where appropriate, prompt remedial action will be taken in accordance with applicable local laws.

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 LGBTQ.Support@wipro.com.

2.6 Employee rights and obligations

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

- Familiarize themselves with the policy and complete any required training. In some countries or states, training is mandated by law.
- Cooperate with any measures introduced to promote equal opportunities at the workplace.
- Respect others’ sensitivities.
- Never undertake 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.

2.7 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

2.8 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 LGBTQ+ discrimination.
- Any employee of Wipro who retaliates against anyone involved in an LGBTQ+ 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.

2.9 POC for queries:

Global LGBTQ+ Charter Lead

2.10 Review

This policy is reviewed once every year for relevance, effectiveness and adherence to international standards and best practices or upon change of applicable laws. Any change, including termination of this Policy, will be at Wipro's sole discretion. In the event of an exceptional circumstance, or when in doubt on the interpretation of the policy, the decision of the DEI HR Head would be final and binding

Revision History

Version	Revision Date	Reason for Change	Drafted/ Reviewed By	Approved By	Date Approved
1.0	June 2021	Initial Version	HR Team	Sarika Pradhan	June 2021
1.1	26.4.2023	Updates Based on the Pillars and Terminology	Organizational Capability Team	Aji George – General Manager and Head, Organizational Capability	26.04.2023
1.2	13.3.2024	Refined Wording and Updated Paths on The Dot	Organizational Capability Team / Global LGBTQ+ Charter Lead	Sukanya Ramachandran	13.03.2024
1.3	06.08.2024	Updates under Spirit of Wipro and Review	Organizational Capability Team	Sukanya Ramachandran	06.08.2024



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