



Wipro Supplier Code of Conduct



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A. SPIRIT OF WIPRO

The Spirit of Wipro represents the core values of Wipro. The four values encapsulated in the Spirit of Wipro are:

Be passionate about clients' success

We succeed when we make our clients successful. We collaborate to sharpen our insights and amplify this success. We execute with excellence. Always.

Treat each person with respect

We treat every human being with respect. We nurture an open environment where people are encouraged to learn, share and grow. We embrace diversity of thought, of cultures, and of people.

Be global and responsible

We will be global in our thinking and our actions. We are responsible citizens of the world. We are energized by the deep connectedness between people, ideas, communities and the environment.

Unyielding integrity in everything we do

Integrity is our core and is the basis of everything. It is about following the law, but it's more. It is about delivering on our commitments. It is about honesty and fairness in action. It is about being ethical beyond any doubt, in the toughest of circumstances.

Wipro expects the same commitment from our Supplier.

At Wipro, we also believe that our suppliers, agents, service providers, channel partners, dealers, distributors and vendors ("Suppliers") make significant contributions to our success and we treat our Suppliers with respect. We select our suppliers based on their merit, competitive price, quality and performance. Importantly, we require our Suppliers to conduct their businesses in legal and ethical manner and comply with all applicable laws and regulations.

Suppliers shall read, understand and affirm compliance to this Supplier Code of Conduct ("Code"). Wipro expressly retains the right to unilaterally modify or amend this Code, at Wipro's sole discretion, with or without prior notice to Suppliers.

Wipro prioritizes building mutually beneficial relationships with its suppliers, ensuring a thorough assessment of technical proficiency and compliance during onboarding. Furthermore, Wipro collaborates with suppliers to evaluate their environmental, social, and governance (ESG) performance, aiming to reduce carbon emissions and enhance ESG metrics, aligning with Wipro's Net Zero commitment. Wipro runs a robust supplier diversity program and through initiatives like the WINDOV and WISDOM programs, it supports diverse suppliers, facilitating access to global procurement teams and providing mentorship to enhance their capabilities. We encourage our suppliers to participate in such supplier development programs, obtain applicable ISO Certifications, align with regional and global ESG industry associations and partnerships for e.g. UNGC, RE100 etc., disclose Sustainability/ ESG data through public reporting aligned with ESG standards and frameworks for example GRI, SASB, UNSDG etc.

APPLICABILITY

Primary Stakeholders: This Code shall apply to all Suppliers who engage in business relationships with Wipro or on behalf of Wipro. The term “Wipro” includes all subsidiaries and affiliates of Wipro Limited.

Geographies: Global

B. ELEMENTS OF SUPPLIER CODE OF CONDUCT

1. SUSTAINABLE PROCUREMENT PRACTICES:

At WIPRO, we're dedicated to conducting procurement in line with our environmental, social and governance goals. Recognizing our purchasing power's impact, we aim to minimize negative effects and maximize positive outcomes by:

- **Eco-friendly Practices:** Emphasize goods and services that are eco-friendly, focusing on energy efficiency, water efficiency, resource efficiency, waste minimization and biodiversity preservation.
- **Legal Compliance:** Adhere to relevant laws, regulations, and international standards regarding procurement, environmental protection, and human rights.
- **Human Rights and Labor Rights:** Ensure suppliers uphold human rights, labor rights, and ethical practices, with a strict prohibition on forced or child labor.
- **Local Sourcing:** Encourage local sourcing to support the economy and reduce emissions, actively seeking suppliers that are minority-owned, women-owned, and small businesses.
- **Capacity-Building and Collaboration:** Collaborate with suppliers to enhance their sustainability performance through capacity-building and sharing best practices, forming long-term partnerships with committed suppliers. Wipro deems supplier collaboration as critical to making its procurement processes sustainable and resilient
- **Monitoring and Evaluation:** Continuously monitor and evaluate supplier performance against sustainability criteria, using metrics and KPIs to track sustainability impact.
- **Quality and Reliability:** Ensure sustainability without compromising quality, evaluating suppliers based on sustainability while maintaining reliability and efficiency.
- **Transparency and Accountability:** We strive to have clear visibility into our supply chains, from raw material sourcing to final product delivery. This transparency helps us in identifying potential risks such as unethical practices, environmental impacts, or labor violations. We hold our suppliers accountable to uphold integrity and ethical standards in all aspects of their business operations.
- **Continuous Improvement:** Suppliers are required to self-monitor and ensure compliance with the Wipro's Supplier Code of Conduct. Suppliers should actively audit their business and operation in regard to Environment, Social and Governance.
- **Feedback:** Suppliers are expected to participate in surveys and feedback initiatives conducted directly or through external partners by Wipro.

1.1 ENVIRONMENT

Wipro strives to reduce and minimize the environmental footprint of its internal operations. Our focus will primarily be on four dimensions: 1. Reduction in our Energy and GHG (Greenhouse Gas) footprint, 2. Increase in the efficiency of use and recycling of water, 3. Sustainable Waste management minimizing waste-to-landfill and 4. Enhancing Biodiversity in our campuses.

We encourage our suppliers to align with our efforts by implementing similar strategies to reduce their energy and GHG footprint, improve water efficiency and recycling, practice sustainable waste

management to minimize waste-to-landfill, and contribute to enhancing biodiversity in their operations. Wipro collaborates with key vendors and suppliers on water stewardship practices in its supply chain. All our suppliers must ensure compliance with all applicable laws.

1.2 SOCIAL

At WIPRO, we abide by Labour Practices and Human Rights practices. We believe in upholding the dignity, rights, and well-being of all individuals involved in our supply chain. Suppliers are expected to comply with the following principles:

- **FORCED OR COMPULSORY LABOUR:** Suppliers must ensure that their employees are hired on their own free will and must prohibit forced, bonded, or any other form of compulsory labour such as slavery or trafficking, transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services in all of their operations. A written employment agreement containing terms and conditions of employment must be provided by the Suppliers to all their employees. Suppliers and their agents may not confiscate any identity or immigration documents, such as government-issued identification cards, passports or work permits, unless required by law.
- **PROHIBITION OF CHILD LABOUR:** Commitment from Suppliers is expected in implementing the applicable laws against child labour, including those relating to minimum age limits. To promote eradication of child labour in a proactive manner, Suppliers must work towards a strict 'no child-labour' policy.
- **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING:** In conformance with applicable laws, Suppliers must respect the legal right of all employees to join trade unions or form associations, freely associate, organize and bargain collectively and must not impose restrictions on these rights. Suppliers must create employment conditions which foster mutual trust between their management and their employees.
- **DISCRIMINATION AND HARRASSMENT:** Suppliers must ensure respectful treatment, equal opportunities, and a harassment-free workplace for employees. Suppliers must not discriminate their employees in any employment-related matters on the basis of ethnic and national origin, race, caste, religion, language, disability, age, gender, creed, gender identity, gender expression, sexual orientation, protected veteran status, or any other characteristic protected by law, with the exception of any local law requirement to adopt affirmative action in a particular geography. Suppliers should establish favorable employment conditions to foster positive work relationships, facilitate communication, and support employee development.
- **WORKING CONDITION:** Suppliers must ensure that their employees do not work more than the maximum working hours prescribed by the applicable laws or regulations. Remuneration paid by suppliers to their employees must comply with applicable laws or regulations. Supplier must ensure that recruitment, wages, and benefits to their employees are aligned with fair wages and equal opportunity principles.
- **OCCUPATIONAL, HEALTH AND SAFETY:** Suppliers must take appropriate measures to prevent workplace injuries and ill health and must provide employees with safe and healthy working environment by considering the evolving industry practices and societal standards of care. Suppliers must strive to implement management systems to meet these requirements.
- **DATA PRIVACY:** Wipro's Code of Business Conduct emphasizes data privacy, ensuring adherence to Global Data Privacy and Data Protection laws, regulations throughout data processing lifecycle. Suppliers must collect and process personal data abiding all Data Privacy principles like Lawfulness, Fairness and Transparency, Purpose limitation, Data Minimization, Accuracy, Storage limitation, Data Localization, Integrity and Confidentiality, Accountability and maintaining stringent guidelines on data retention timelines. Supplier shall be also using lawful grounds like consent and legal obligation. Processing should be fair, transparent, and consistent with data subjects' rights.
- **INFORMATION SECURITY:** Wipro's IT infrastructure is certified under the ISO 27001 certification, ensuring information security, physical security, and business continuity. Suppliers are integral to

safeguarding critical data, adhering to Wipro's security protocols and regulatory obligations. They must implement and maintain data security controls, promptly report security incidents, and collaborate on service deliverables to ensure compliance with contractual security requirements.

2. GOVERNANCE

- **BUSINESS INTEGRITY AND ETHICS:** Wipro strictly adheres to global anti-bribery and corruption laws, maintaining a zero-tolerance policy. Suppliers must not offer anything of value to influence business decisions or gain an advantage. Invoices must accurately reflect services rendered, and false entries are prohibited. Offering gifts or entertainment to Wipro employees with the intent to influence business decisions is prohibited. Suppliers must not give, offer, promise to offer, or authorize the offer, directly or indirectly (i.e. proxy bribing) anything of value (such as money, shares, goods or service) to any third party, including but not limited to government officials or officials of any political party, which could be regarded as influencing any business decision or for obtaining improper advantage in connection with Wipro's business, or in connection with any commercial transaction or relationship to which Wipro is a party. Government officials include employees of government companies, public sector undertakings, departments, institutions of any government, foreign officials including officials of public international organizations. Wipro adheres to global anti-bribery and corruption laws, including the U.S. FCPA and the U.K. Bribery Act 2010. We enforce a zero-tolerance policy towards bribery and corruption.
- **CONFLICT OF INTEREST:** Suppliers are expected to use good judgment and avoid situations that can lead to even the appearance of a conflict. Conflicts of interest can undermine the trust others place on the Suppliers and proactively address any situations of potential conflict with Wipro or our officers and employees.
- **CONFIDENTIALITY:** Suppliers must safeguard confidential business and personal information obtained from Wipro and refrain from sharing it with unauthorized individuals. This includes employee data and third-party information entrusted to Wipro.
- **ANTI-COMPETITIVE AND RESTRICTIVE TRADE PRACTICES:** Suppliers are encouraged to promote free and fair competition and to get business by offering competitive prices and innovative products and service.
- **INSIDER TRADING:** Suppliers must ensure that WIPRO's confidential information may not be used for personal benefit at the stock market. Each of us is prohibited from trading securities or passing information on to others who then trade ("tipping") based on material information before it is made publicly available to ordinary investors.
- **BUSINESS CONTINUITY:** Suppliers are encouraged to have plans and procedures to resume operations after any physical disaster (e.g., fire, flood, earthquake) or work stoppage (e.g., labor strike, economic breakdown). Upon mutual agreement of the business continuity plan, suppliers must recommence services within the agreed timelines following such events.

3. SUPPLIERS RESPONSIBILITY:

Suppliers are responsible for ensuring their employees, subsidiaries, business partners, and subcontractors understand and adhere to WIPRO's Supplier Code of Conduct. They must self-monitor compliance, share reports, and assist in audits, including on ESG and regulatory matters. Without limitation, such audits may include Environmental, Social, Governance (ESG) parameters, applicable Statutory and regulatory compliances, and adherence to other contractual commitments (for e.g. Master Service Agreement).

4. COMPLIANCE WITH APPLICABLE LAWS

Suppliers are encouraged to adhere strictly to all relevant national and local laws, as well as international treaties and industry norms, covering aspects such as labor, immigration, health, safety, and environmental standards. They must also keep comprehensive records of their compliance with these laws and furnish them to WIPRO upon request.

5. MAINTENANCE OF RECORDS

Suppliers must maintain their books and records as per applicable laws and regulations.

6. USE OF WIPRO ASSETS AND ELECTRONIC RESOURCES

Suppliers must ensure that their employees utilize Wipro's assets (both tangible and intangible) and electronic communication devices/ resources only in a legal and ethical manner. Suppliers may use Wipro's name and logo only for duly authorized and permitted purposes.

7. COMMUNICATIONS

Suppliers must periodically communicate the standards of this Code to their employees and encourage them to conduct periodic self-evaluations to ensure compliance.

8. VIOLATIONS OF THIS CODE OF CONDUCT

Failure to comply with this Code or any other applicable law/regulations by Suppliers will result in termination of Wipro's business relationship/ association/ contract with the Supplier.

9. SPEAKING UP

Wipro's endeavour is 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 by raising their concern(s) through the following links: www.wiproombuds.com; <http://www.wipro.com/investors/corporate-governance/ombudsprocess/>

Suppliers should keep their contractors working on Wipro Projects harmless in the event of a contractor raising any concern to Wipro Ombudsman. In such an event, Supplier to agree, that they will not take any action against the said contractor.

Reference Policies

#	WIPRO's Policies	External/ Internal	Link
1	Code of Business Conduct	External	https://www.wipro.com/investors/corporate-governance/policies-and-guidelines/
2	The Ombuds Process		
3	Global policy on Prevention of Sexual Harassment		
4	Global Policy on Inclusion & Diversity		
5	Data Privacy Policy		

VERSION CONTROL

Amendment Date	Policy Version	Author	Approved by	Nature of Change
June 2011	1.0			Launch
February 2015	2.0			Included a section on Wipro's policy on Conflict of Interest
August 2016	3.0			Included specific reference to element of modern slavery in compliance with the Modern Slavery Act of the UK
May 2017	4.0			Included the new Sprit of Wipro and revised link for raising a concern
April 2018	5.0			Updated section 5 "Equal Employment Opportunity and Non-Discrimination/No Harressment" in compliance with the Human Rights Campaign Corporate Equality Index.
August, 2024	6.0	Pankaj Gupta	Pankaj Gupta	Updated language and clauses on environment, social and data privacy



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 250,000 employees and business partners across more than 60 countries, we deliver on the promise of helping our clients, colleagues, and communities thrive in an ever-changing world.

