



# Global Policy for Prevention of LGBTQIA+ Discrimination

## Document Control

Function	Corporate HR
Sub-function	Inclusion and Belonging
Policy Owner	Director & Head – Inclusion and Belonging
Policy Effective Date	March 13, 2024

## 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, Intersex, Asexual and more (LGBTQIA+) community, with a work environment devoid of discrimination, bullying and harassment. The policy also promotes respect and equal treatment in line with “Being Respectful”, one of the Wipro Five Habits.

### 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 LGBTQIA+ community, Wipro will abide by its internal rules against discrimination.

## 2. Policy Details

### 2.1 Spirit of the policy

A workplace free from LGBTQIA+ 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 LGBTQIA+ 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 LGBTQIA+ discrimination in the workplace.

This policy aims to:

- Encourage employees to actively prevent LGBTQIA+ 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 LGBTQIA+ employees, whether openly identifying themselves as LGBTQIA+ or assumed to be LGBTQIA+.
- Assure all LGBTQIA+ employees that their concerns will be resolved by Wipro.
- Take steps to ensure compliance with all LGBTQIA+ discrimination laws in all relevant geographies.

## **2.2 What is LGBTQIA+ discrimination?**

LGBTQIA+ 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 LGBTQIA+, or assumed to be LGBTQIA+, also constitutes LGBTQIA+ discrimination.

An act or conduct can be categorized as discrimination if:

- It has the purpose or the effect of violating the dignity of an LGBTQIA+ 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 LGBTQIA+ employee's work performance.
- It adversely affects an LGBTQIA+ employee's employment or career pursuit opportunities.

## **2.3 Prohibition of LGBTQIA+ 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 LGBTQIA+ 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 LGBTQIA+ discrimination**

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

## **2.5 Mode of Registering Complaint**

If any employee from the LGBTQIA+ 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](http://www.wiproombuds.com) or they can communicate about the grievance by email at [ombuds.person@wipro.com](mailto: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 LGBTQIA+ Charter Lead, at [LGBTQ.Support@wipro.com](mailto: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 LGBTQIA+ discrimination to the appropriate persons.
- Maintain confidentiality, as needed, for any aspect of an inquiry to protect the employee belonging to the LGBTQIA+ 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 LGBTQIA+ 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](#))
- Global LGBTQIA+ Charter on The Dot ([here](#))
- Wipro Pride Social on The Dot ([here](#))
- 'Championing LGBTQIA+ Inclusion in the Workplace' e-learning module on WiLearn ([here](#))
- Community events, open both to LGBTQIA+ 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 LGBTQIA+ discrimination claim.

- Retaliatory action need not be job-related or occur in the workplace for it to constitute unlawful retaliation.
- Even if the alleged LGBTQIA+ 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 LGBTQIA+ discrimination.
- Any employee of Wipro who retaliates against anyone involved in an LGBTQIA+ 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 LGBTQIA+ discrimination.

## 2.9 POC for queries:

Global LGBTQIA+ 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 Inclusion & Belonging (I&B) Head would be final and binding.

## Annexure A – Examples of LGBTQIA+ discrimination at the workplace

### 2.2.1 Examples of Homophobic Discrimination, Bullying, and Harassment

- **Exclusionary behavior:** A gay employee is consistently left out of team lunches or social events after colleagues discover his sexual orientation.
- **Derogatory language:** A manager refers to a lesbian employee as “not the marrying kind” in a team meeting.
- **Assumptions about lifestyle:** A colleague assumes a male employee must be straight and repeatedly asks about his “girlfriend,” despite being corrected.

### 2.2.2 Examples of Biphobic Discrimination, Bullying, and Harassment

- **Invalidation:** A bisexual employee is told they are “just confused” or “going through a phase.”
- **Stereotyping:** Colleagues joke that bisexual people “can’t be trusted in relationships.”
- **Erasure:** A bisexual person in a same-gender relationship is assumed to be gay or lesbian, and their bisexual identity is dismissed.

### 2.2.3 Examples of Transphobic and Non-Binary Discrimination, Bullying, and Harassment

- **Misgendering:** A transgender or non-binary employee is repeatedly referred to by the wrong pronouns, even after correction.

- **Deadnaming:** A colleague uses a trans or non-binary person's former name despite being informed of their correct name.
- **Inappropriate curiosity:** A non-binary employee is asked intrusive questions like “What are you really?” or “So, are you transitioning to male or female?”
- **Exclusion from facilities:** A non-binary employee is told they cannot use either the men's or women's restroom and are not provided with a gender-neutral alternative.

#### 2.2.4 General Examples of LGBTQIA+ Discrimination

- **Retaliation:** An employee who reports homophobic jokes is labeled as “too sensitive” and excluded from future projects.
- **Hostile environment:** Posters or memes mocking LGBTQIA+ identities are displayed in shared workspaces or online channels.

## 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
1.4	22.05.2025	Revision of the policy to include evolved perspectives and philosophy	Inclusion and Belonging Team / Global LGBTQIA+ Charter Lead	Sukanya Ramachandran, Director & Head – Inclusion and Belonging	22.05.2025



## About Wipro Limited

Wipro Limited (NYSE: WIT, BSE: 507685, NSE: WIPRO) is an AI-powered technology services 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 over 230,000 employees and business partners across 65 countries, we deliver on the promise of helping our customers, colleagues, and communities thrive in an ever-changing world.