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## ***OMBUDS POLICY***

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## 1. INTRODUCTION AND SPIRIT OF THE POLICY

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Wipro Enterprises (P) Limited, including its subsidiaries and associate companies (“Wipro” or the “Company”) is committed to the highest standards of upholding the ethical standards, probity and accountability.

Employees are often the first to recognize any concern within the Company. However, they may ignore such concerns or dismiss them as mere suspicions or disloyalty to their colleagues, managers or to the Company itself. Also, they may not be aware of the appropriate procedure or the internal authority to whom the concern must be raised.

The Ombuds Policy is the platform provided by the Company to enable employees and extended Wipro family consisting of business partners, vendors, suppliers, contractors, consultants and such other entities associated with the Company to not overlook any concern but instead raise it at an early stage and in the right manner, without fear of retaliation, victimization, subsequent discrimination or disadvantage at workplace or in business dealings with the Company.

As is well known, Wipro does not tolerate any malpractice, impropriety, abuse or wrongdoing and encourages employees and extended Wipro family members to come forward and voice their concerns if any deviations to Wipro’s Code of Business Conduct and Ethics is noticed. **Wipro assures that such concerns would be enquired into by designated persons/committees independently and fairly.**

## 2. APPLICABILITY OF THE POLICY

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This Policy applies to all employees of the Company including those who are on probation and notice period and extended Wipro family members. It also applies to employees of vendors and service providers, contract employees, clients, retainers, consultants, trainees and interns. To clarify, any of these persons who raise concerns under this Policy are referred to as “complainants” in this Policy.

## 3. ASSURANCES UNDER THE POLICY

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If a complainant raises a concern under this Policy, he/she will not be under any risk in the form of retribution or retaliation including the risk of his/her job. If one acts in good faith and not with *malafide* intentions, it does not matter if the concern was raised by mistake.

The Company will not tolerate any harassment or victimization (including informal pressures) against any complainant who raises a genuine concern and will take appropriate action to protect the complainant when he/she raises a concern in good faith.

If the complainant raising a concern requests that his/her identity should not be disclosed, the Company will not disclose. However, please note that to conduct effective investigation complainant’s identity may be required in certain cases and in its absence, Company may be unable to resolve the complainant’s concern. In such situation, complainant shall be informed that his/her identity is required to be revealed and only upon the complainant’s consent his/her identity shall be revealed and investigation will be initiated.

However, under any circumstance if a complainant believes that he/she has been retaliated against for disclosing any concern, he/she may file a written complaint to the Chief Ombudsperson to seek remedy.

#### **4. POLICY AND PROCEDURE FOR DISCLOSURE, ENQUIRY AND DISCIPLINARY ACTION**

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##### **4.1 What constitutes malpractice, impropriety, abuse or wrongdoing?**

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Concerns can be raised on Ombuds platform in respect of a variety of issues and some are listed below. This list is intended to illustrate the types of issues that may be raised under this Policy:

- Any unlawful act, whether criminal (e.g. theft) or a breach of the civil law (e.g. slander or libel).
- Breach of any Policy of Code of Business Conduct and Ethics (“COBCE”) adopted by the Company from time to time.
- Breach of Company’s Code of conduct to regulate, monitor and report trading by designated persons and their immediate relatives (“Code”), including any incident involving leak or suspected leak of unpublished price sensitive information.
- Health and safety risk observed, including risk to the public as well as other persons (e.g. faulty electrical equipment).
- Abuse including physical, sexual, psychological or financial abuse, exploitation or neglect.
- Damage to the environment (e.g. pollution).
- Fraud and corruption (e.g. to solicit or receive or offer or promise any gift/reward as a bribe).
- Any instance of failure to comply with legal or statutory obligation either for and on behalf of the Company or in any personal capacity in the course of discharging duties of the Company.
- Any instance of any sort of financial malpractice or wrongful accounting practice.
- Conflict of interest.
- Abuse of power (e.g. bullying or workplace harassment).
- Any other unethical or improper conduct or a conduct that is in violation of any Policy of the Company.
- Social Media misuse.

##### **4.2 Limitation of time to raise a concern**

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A complainant raising a concern is required to share all available and relevant information regarding the concern at the earliest from the date of his/her knowledge of the concern. Please note that sharing of complainant’s personal information shall be considered as a consent from the complainant to process such information if required unless the complainant has specifically requested that the details should not be disclosed without his/her specific consent.

### 4.3 To whom should a concern be raised?

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The concern may be raised through e-mail [ombuds.person@wipro.com](mailto:ombuds.person@wipro.com), or through intranet “MyWipro →App Store →Information →Ombuds” or through this link <https://wipro.i-sight.com/landing-page>

### 4.4 Who will investigate into the concern?

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The concern shall be investigated by the Designated Ombudsperson and or the committee constituted for this purpose.

### 4.5 Procedure for handling concerns raised

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- Once a concern is raised by a complainant, the same is taken up for inquiry.
- The complainant may be contacted for more details.
- The investigation is neutral and the report contains facts, evidences and context of the investigation.
- A decision is made by the appropriate authority on the action to be taken basis the findings of the investigation.

The complainant raising the concern must provide sufficient and relevant information to start the investigation. In case the complainant is non-responsive in providing adequate information and data for more than 15 days, the complaint may be concluded on the basis of available facts and information.

The Company will keep the complainant informed on the conclusion and findings of the inquiry process

All discussions and information associated with the Ombuds process must be kept confidential by the individuals associated with the concern. Breach of this will result in disciplinary action against the individual, which may lead to termination

**Compliance with Local Laws:** In certain countries, local law may mandate that investigation must be carried out by a specific department in an organization present in that country. In such situations, Ombudsperson will assign the investigation to that specific department.

### 4.6 Appeal

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If the complainant or the person complained against is not satisfied with the decision taken on a concern, he/she can file an appeal with the Chief Ombudsperson and the same needs to be reviewed by a member of the compliance committee, other than the Chief Ombudsperson.

Please note that investigation which lead to a decision of termination are reviewed and approved by the Compliance Committee as part of the completion of the inquiry process and hence are not subject to further appeal.

### 4.7 Anonymous complaints

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The Ombudspersons will take into consideration all anonymous complaints for appropriate investigation based on the following factors:

- The seriousness of the concern raised;
- The credibility of the concern;
- The likelihood of confirming that the allegation is raised through reliable sources; and
- The ability to investigate into anonymous complaints.

However, the Company encourages complainants raising a concern to provide his/her name to facilitate addressing the concern more effectively and expeditiously.

#### **4.8 Untrue allegations**

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If a complainant makes an allegation in good faith, which is not confirmed by subsequent investigation, no adverse action will be taken against that complainant. In making a disclosure the complainant should exercise due care to verify the accuracy of the information provided in the complaint. Disciplinary action may be taken against an employee who makes *mala fide* or frivolous allegations.

#### **4.9 Maintaining confidentiality of the concern as well as the disclosure**

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The complainant raising a concern or the persons to whom the concern is made or any person involved in the investigation including witnesses shall maintain confidentiality and shall not disclose / discuss the concern or the internal proceedings with any third party.

The obligation of confidentiality does not however restrain an individual from disclosing the information as part of legal proceedings initiated by the individual or in response to any statutory or judicial process in accordance with the law.

### **5. PENALTIES UNDER POLICY**

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If a person, against whom the concern is raised, is found guilty, then the Company shall take appropriate action as per the Company's disciplinary policy.