

# DXC Global Reporting Initiative (GRI) Report FY 2024

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# **General Disclosures**

# **GRI 2: General Disclosures**

# 2.1 The Organization and Its Reporting Practices

# **Disclosure 2-1: Organizational Details**

- a. Report its legal name: DXC Technology Company; https://www.dxc.com/
- b. Report its nature of ownership and legal form: Please refer to DXC Technology's 2024 Annual Report: <a href="https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/annual-report/DXC-Annual-Report-2024.pdf">https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/annual-report/DXC-Annual-Report-2024.pdf</a>
- **c. Report the location of its headquarters:** DXC Technology Corporate Office, 20408 Bashan Drive, Suite 231, Ashburn, Virginia (VA) 20147, USA
- d. Report its countries of operation: Argentina, Australia, Austria, Belgium, Brazil, Brunei Darussalam, Bulgaria, Canada, Chile, China, Colombia, Costa Rica, Czech Republic, Denmark, Egypt, Fiji, Finland, France, Georgia, Germany, Hong Kong, Hungary, India, Indonesia, Ireland, Israel, Italy, Japan, Kazakhstan, Korea, Luxembourg, Malaysia, Mexico, Morocco, Netherlands, New Zealand, Nigeria, Norway, Panama, Peru, Philippines, Poland, Portugal, Qatar, Republic of Lithuania, Romania, Saudi Arabia, Serbia, Singapore, Slovakia, South Africa, Spain, Sweden, Switzerland, Taiwan, Thailand, Tunisia, Turkey, Ukraine, United Arab Emirates, United Kingdom, United States of America, and Vietnam.

# Disclosure 2-2: Entities Included in the Organization's Sustainability Reporting

- a. List all its entities included in its sustainability reporting: The financial statements include the accounts of DXC, its consolidated subsidiaries, and those business entities in which DXC maintains a controlling interest.
- b. If the organization has audited or consolidated financial statements or financial information filed on public record, specify the differences between the list of entities included in its financial reporting and the list included in its sustainability reporting:

  Not applicable
- c. If the organization consists of multiple entities, explain the approach used for consolidating the information, including:
  - i. Whether the approach involves adjustments to information for minority interests: Where data is available for minority interests, it is included in our aggregated reporting.
  - ii. How the approach takes into account mergers, acquisitions, and disposal of entities or parts of entities: All disposals and acquisitions are included.
  - iii. Whether and how the approach differs across the disclosures in this Standard and across material topics: We apply a consistent approach across all disclosures.

# Disclosure 2-3: Reporting Period, Frequency, and Contact Point

- a. Specify the reporting period for, and the frequency of, its sustainability reporting: DXC reports annually in accordance with the latest Global Reporting Initiative (GRI) Standards, core options.
- b. Specify the reporting period for its financial reporting, and, if it does not align with the period for its sustainability reporting, explain the reason for this: DXC Technology's Fiscal Year 2024 (FY24): April 1, 2023 March 31, 2024



- c. Report the publication date of the report or reported information: December 2024
- d. Specify the contact point for questions about the report or reported information: Sue Ann Averitte, Vice President, Environmental, Social and Governance (ESG), DXC Technology

# **Disclosure 2-4: Restatements of Information**

a. Report restatements of information made from previous reporting periods and explain: We have not issued any restatements.

## **Disclosure 2-5: External Assurance**

a. Describe its policy and practice for seeking external assurance, including whether and how the highest governance body and senior executives are involved: Our Scope 1, 2, and 3 emissions have been externally assured to ISO 14064-3:2019 or ISO 14064-3:2006 since 2017. We seek external assurance for our emissions to ensure accuracy and continuous improvement against our targets.

The DXC Board of Directors and ESG Executive Steering Committee provide oversight for DXC's ESG strategy and climate-related matters. Disclosures are reviewed with the board of directors and key senior executives prior to publishing.

- b. If the organization's sustainability reporting has been externally assured:
  - i. Link to our external assurance statement for FY24: <a href="https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-ISO-14064-3-Verification-Statement.pdf">https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-ISO-14064-3-Verification-Statement.pdf</a>
  - ii. Our Scope 1, 2, and 3 emissions have been externally assured to ISO 14064-3:2019 or ISO 14064-3:2006 since 2017. In FY24, external verification of DXC's greenhouse gas (GHG) emissions to limited assurance was provided by SGS United Kingdom Ltd.: <a href="https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-ISO-14064-3-Verification-Statement.pdf">https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-ISO-14064-3-Verification-Statement.pdf</a>. We seek external assurance for our emissions to ensure accuracy and continuous improvement against our targets.
  - iii. DXC seeks assurance only from non-affiliated third parties to ensure no conflicts of interest.

# 2.2 Activities and Workers

# Disclosure 2-6: Activities, Value Chain, and Other Business Relationships

- a. Report the sector(s) in which it is active: We serve government and business customers only (not individuals), from across multiple sectors globally. DXC Technology (NYSE: DXC) helps global companies run their mission-critical systems and operations while modernizing IT, optimizing data architectures, and ensuring security and scalability across public, private and hybrid clouds. The world's largest companies and public sector organizations trust DXC to deploy services to drive new levels of performance, competitiveness, and customer experience across their IT estates. Learn more about how we deliver excellence for our customers and colleagues at DXC.com.
- b. Describe its value chain: As an IT services company DXC thrives on a robust value chain, meticulously designed to deliver value to our customers. Our core operations, driven by cutting-edge technology and skilled professionals, transform resources into innovative IT solutions. Our dynamic marketing and sales strategies effectively communicate our offerings. Support activities, including firm infrastructure, human resource management, technology development, and procurement, underpin and enhance our primary operations, fostering a culture of excellence and innovation. Together, these activities create a cohesive and efficient value chain, positioning us as a leader in the IT services industry.

The supply chain management function plays an important role in developing and implementing global and regional supplier management strategies that aim to form strong partner relationships



and continuous improvement in the areas of price, quality, service, and supplier diversity. Key spend areas include software, hardware, services, and labor.

**c. Report other relevant business relationships:** Our partner ecosystem enables our customers to harness the power of technology at scale and transform their businesses through joint business objectives, investments, innovation, and co-development with our partners.

DXC partners with Amazon Web Services (AWS), Microsoft Azure, Google Cloud, Oracle Cloud Infrastructure, VMware, Red Hat, Dynatrace, and ServiceNow for cloud infrastructure; and with SAP, Oracle, and Salesforce for cloud platforms. DXC also partners with storage and hardware vendors, Dell, HP Inc., IBM, Hewlett Packard Enterprise, Veritas, Pure Storage, and Hitachi Vantara.

DXC and AWS expanded their existing strategic partnership to accelerate cloud adoption and digital transformation, and upskill DXC professionals with role-based AWS certifications. This has created an industry-leading talent pool for cloud transformation capability, and transformed DXC's service delivery into a cloud-centric and asset-light model.

DXC's partnerships help our customers meet their sustainability objectives. For example, collaborating with partners and enabling customers to transition workloads from on-premises data center or storage solutions to the cloud can result in more energy efficient outcomes. Cloud solutions require fewer servers, which allows for less energy consumption. DXC's cloud partners are pursuing aggressive decarbonization targets. For example, Microsoft has committed to being carbon negative by 2030 and to supporting data centers with 100% renewable energy by 2025. Transferring customers to efficient partner data centers can enable lower Scope 3 emissions for customers. Analysis has shown that the DXC Cloud Right™ approach can have an important impact on supporting sustainability goals, reducing CO₂ emissions by as much as 37% compared to on-premises estates. By working with partners that offer decarbonization pathways, DXC can provide value to customers beyond price reductions by aligning with their decarbonization goals and ensuring that the carbon reductions associated with DXC's offerings and services are factored into decision-making processes.

For more information, please visit our Partner Ecosystem web page at https://dxc.com/us/en/about-us/partner-ecosystem.

d. Describe significant changes in 2-6-a, 2-6-b, and 2-6-c compared to the previous reporting period: DXC has had no significant changes compared to the previous reporting period.

# **Disclosure 2-7: Employees**

 Report the total number of employees and a breakdown of this total by gender and by region

# **DXC Global Head Count by Gender: FY24**

Head Count by Gender	Female	Male	Not Declared	Total
Americas	6,452	13,367	89	19,908
APJ-MEA*	24,536	40,872	50	65,458
Europe	13,356	28,433	121	41,910
Global Total	44,344	82,672	260	127,276

<sup>\*</sup> Asia Pacific, Japan, Middle East and Africa



# b. Report the total number of:

- i. Permanent employees, and a breakdown by gender and by region
- ii. Temporary employees, and a breakdown by gender and by region
- iii. Nonguaranteed hours employees, and a breakdown by gender and by region: Not applicable
- iv. Full-time employees, and a breakdown by gender and by region
- v. Part-time employees, and a breakdown by gender and by region

Head Count by Position Type	Female	Male	Not Declared	Total
Americas				
Casual	26	43	1	70
International Assignee	68	379		447
Regular	6,331	12,899	87	19,317
Temporary/Fixed Term	27	46	1	74
Americas Total	6,452	13,367	89	19,908
APJ-MEA*				
Casual	10	26		36
Fixed Term	21	58		79
International Assignee	3	12		15
Regular	24,460	40,687	50	65,197
Temporary/Fixed Term	42	89		131
APJ-MEA* Total	24,536	40,872	50	65,458
Europe				
Casual		1		1
Fixed Term		10		10
International Assignee	13	70		83
Regular	13,322	28,320	121	41,763
Temporary/Fixed Term	10	19		29
Not categorized	11	13		24
Europe Total	13,356	28,433	121	41,910
Global				
Casual	36	70	1	107
Fixed Term	21	68		89
International Assignee	84	461		545
Regular	44,113	81,906	257	126,277
Temporary/Fixed Term	79	154	1	234
Not categorized	11	13	1	24
Global Total	44,344	82,672	260	127,276

<sup>\*</sup> Asia Pacific, Japan, Middle East and Africa



Work Location Region by Time Type	Female	Male	Not Declared	Total
Americas				
Full time	6,421	13,335	88	19,844
Part time	31	32	1	64
Americas Total	6,452	13,367	89	19,908
APJ-MEA*				
Full time	24,374	40,823	50	65,247
Part time	162	49		211
APJ-MEA Total	24,536	40,872	50	65,458
Europe				
Full time	12,038	27,045	117	39,200
Part time	1,318	1,388	4	2,710
Europe Total	13,356	28,433	121	41,910
Global				
Full time	42,833	81,203	255	124,291
Part time	1,511	1,469	5	2,985
Global Total	44,344	82,672	260	127,276

<sup>\*</sup> Asia Pacific, Japan, Middle East and Africa

- c. Describe the methodologies and assumptions used to compile the data, including whether the numbers are reported: Data is collected and reported by our Human Resources (HR) analytics team. Data shared is based on head count as of March 31, 2024, the last day of our fiscal year 2024.
- d. Report contextual information necessary to understand the data reported under 2-7-a and 2-7-b: Data represents employee head count for the global DXC and its subsidiaries as of March 31, 2024.
- e. Describe significant fluctuations in the number of employees during the reporting period and between reporting periods: We have temporary/fixed-term employees, but they do not work in seasonal variances.

# **Disclosure 2-8: Workers Who Are Not Employees**

- a. Report the total number of workers who are not employees and whose work is controlled by the organization and describe: Contractor head count as of March 31, 2024, was 12,728.
- b. Describe the methodologies and assumptions used to compile the data, including whether the number of workers who are not employees is reported: DXC reports total contractors working on behalf of DXC. We define contractors in accordance with the Internal Revenue Service (IRS) definition of independent contractors.
- c. Describe significant fluctuations in the number of workers who are not employees during the reporting period and between reporting periods: From March 31, 2023, to March 31, 2024, DXC reduced the number of contractors by 17.9%. The reduction is a result of initiatives to reduce the number of contractors in favor of full-time employees.

	Q4 FY23	Q1 FY24	Q2 FY24	Q3 FY24	Q4 FY24
Total Contractors	15,507	14,465	13,772	13,427	12,728



# 2.3 Governance

# **Disclosure 2-9: Governance Structure and Composition**

- a. Describe its governance structure, including committees of the highest governance body: For information on the governance structure of our organization, including committees of the highest governance body, please see <a href="https://investors.dxc.com/governance/board-of-directors/default.aspx">https://investors.dxc.com/governance/board-of-directors/default.aspx</a>.
- b. List the committees of the highest governance body that are responsible for decision making on and overseeing the management of the organization's impacts on the economy, environment, and people: The DXC Board of Directors has three standing committees: the Audit Committee, the Compensation Committee, and the Nominating/Corporate Governance Committee.
- c. Describe the composition of the highest governance body and its committees by:
  - i. Executive and nonexecutive members: Our board of directors leadership structure consists of an independent chairman of the board, a chief executive officer (CEO) and eight (8) independent and nonexecutive members.
  - ii. Independence: Our board of directors' leadership structure consists of an independent chairman, and independent chairs for our Audit Committee, Compensation Committee, and Nominating/Corporate Governance Committee. DXC is committed to maintaining the highest standards of corporate governance. The board adheres to governance principles designed to ensure excellence in the execution of its duties and regularly reviews the company's governance policies and practices. These principles are outlined in DXC's guidelines, which, in conjunction with our articles of incorporation, bylaws, Code of Conduct, board committee charters, and related policies, form the framework for the effective governance of DXC.

The DXC Board of Directors has determined that our current leadership structure, which separates the chairman and CEO roles, provides the most effective leadership structure for the company at this time and is appropriate considering the evolution of DXC's business strategy and operating environment. In particular, the board believes that this structure clarifies the individual roles and responsibilities of CEO and chairman and enhances accountability. The board also believes that the separation of roles allows our chairman to focus on setting board and committee agendas and ensuring the proper flow of information to the board by maintaining close contact with the CEO and other members of senior management, while our CEO focuses on execution of our strategy and management of the company's day-to-day operations. The board regularly reviews its leadership structure to determine the most beneficial arrangement based on the company's unique individual circumstances.

The board has determined that, except for Raul J. Fernandez, who is the company's president and CEO, all of the company's directors, namely David A. Barnes, Anthony Gonzalez, David L. Herzog, Pinkie D. Mayfield, Karl Racine, Dawn Rogers, Carrie W. Teffner, Akihiko Washington, and Robert F. Woods, are independent for the purposes of DXC's guidelines. The board also determined that, except for Raul J. Fernandez, the company's president and CEO, all of the company's directors during FY24 were independent.

- iii. Tenure of members on the governance body: Average tenure is 3.3 years.
- iv. Number of other significant positions and commitments held by each member, and the nature of the commitments: We have a highly effective and engaged board, and we believe that our directors' outside directorships enable them to contribute valuable knowledge and experience to our board. At the same time, the board is sensitive to the external obligations of its directors and the potential for over-boarding. Our guidelines provide that directors should not serve as a director of another company if doing so would create actual or potential conflicts, or interfere with their ability to devote sufficient time and



effort to their duties as a director of DXC. Directors who have a full-time job should not serve on the boards of more than three other public companies, and directors who do not have a full-time job should not serve on the board of more than four other public companies.

Name	Principal Occupation	Other Public Company Boards
David A. Barnes	Former SVP and Chief Information and Global Business Services Officer of UPS	_
Raul J. Fernandez President and CEO	President and Chief Executive Officer of DXC Technology	_
Anthony Gonzalez	Former U.S. Congressman in the United States House of Representatives and current Executive-in- Residence for Alpine Investors	_
David L. Herzog Independent Chairman of the Board	Former CFO and EVP of AIG and current member of MetLife board	1
Pinkie D. Mayfield	Chief Communications Officer and VP of Corporate Affairs at Graham Holdings Company and current member of Broadmark Realty Capital board	1
Karl Racine	Former Attorney General of the District of Columbia, current Partner at Hogan Lovells and current member of SHF Holdings, Inc. board	1
Dawn Rogers	Director of Human Capital at American Securities LLC and former EVP and Chief Human Resources Officer at Pfizer	<u>—</u>
Carrie Teffner	Former Interim Executive Chair of the Board of the Ascena Retail Group and former CFO of Crocs	2
Akihiko Washington	Former EVP of Worldwide Human Resources for Warner Bros. Entertainment	_



Inc.	Robert F. Woods	Former SVP and CFO at SunGard Data Systems Inc.	<del>_</del>
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- v. Gender: 30% of our board members are female.
- vi. Underrepresented social groups: 50% of our board members are from traditionally underrepresented racial/ethnic groups.
- vii. Competencies relevant to the impacts of the organization:

Top Skills	Leadership and Management	Public Company Governance	Industry	Audit and Financial Expertise	Enterprise Transformation and Culture Building	Capital Markets and Treasury	Technology and Information Security	Government/Regulatory and Public Policy	ESC
David A. Barnes	•	•	•	•			•		
Raul J. Fernandez	•	•	•	•	•	•	•		
Anthony Gonzalez	•			•		•		•	•
David L. Herzog	•	•	•	•	•	•			
Pinkie D. Mayfield	•	•		•	•	•			
Karl Racine	•				•			•	•
Dawn Rogers	•	•			•				•
Carrie W. Teffner	•	•		•	•	•	•		
Akihiko Washington	•	•	•		•				•
Robert F. Woods	•	•	•	•		•			

viii. Stakeholder representation: We recognize that engaging with external and internal stakeholders is an essential part of responsible business practice, as it helps us define our sustainability strategy, share our progress, and improve our reporting. We do this in a variety of ways, including annual customer surveys, collaboration websites, committee memberships, and face-to-face dialogue.

# Disclosure 2-10: Nomination and Selection of the Highest Governance Body

- a. Describe the nomination and selection processes for the highest governance body and its committees: The Nominating/Corporate Governance Committee is responsible for reviewing and assessing with the board the appropriate skills, experience, and background sought for board members in the context of our business and the then-current board membership. (Source: <a href="https://d18rn0p25nwr6d.cloudfront.net/CIK-0001688568/024a8fec-1f9e-4d95-8742-0f988b4fdda3.pdf">https://d18rn0p25nwr6d.cloudfront.net/CIK-0001688568/024a8fec-1f9e-4d95-8742-0f988b4fdda3.pdf</a>)
- b. Describe the criteria used for nominating and selecting highest governance body members: The assessment of board skills, experience, and background involves considering numerous factors, including independence, experience, professional and personal ethics and values, age, gender, and ethnic diversity, as well as skills and attributes. The board seeks directors whose expertise achieves a balance across the following skills and attributes:
  Leadership and Management: Includes experience as a senior executive in a global or large public or private organization, with practical skills and insights around setting business strategy, overseeing operations, driving cost leadership, facilitating change management, leading transformation, and driving results.

Public Company Governance: Experience with corporate and board governance, including



oversight of compliance, risk, regulatory requirements, executive compensation practices, and policies and processes to effectively manage and monitor these in support of the stockholders' interests.

**Industry:** Experience in the professional services industry with a good understanding of DXC's strategy, offerings, digital transformation, innovation, customers, marketplace dynamics, and success drivers.

**Audit and Financial Expertise:** Experience and understanding of areas such as accounting policies and standards, financial reporting, disclosure requirements, financial statements, internal controls, audit (internal and external), complex financial transactions, capital allocation, and mergers and acquisitions.

**Enterprise Transformation and Culture Building:** Experience in workforce transformation, restructuring, and building a high-performance culture in a complex global or large environment as the landscape for technology services embraces marketplace-led disruption. Experience aligning HR policies and practices to attract, onboard, develop, and retain top talent in support of DXC's strategic talent plan.

**Capital Markets and Treasury:** Experience globally in raising funds in the debt and equity markets; managing liquidity; and managing the complex interplay of operational performance, rating agencies, and stockholder relationships.

**Technology and Information Security:** Experience in senior leadership roles at companies in the technology landscape and an understanding of DXC's enabling technologies. Experience managing information security risks, including an understanding of the information security threat landscape.

**Government/Regulatory and Public Policy:** Broad regulatory or policymaking experience in business, government, technology, or public service. Experience in government positions or through extensive interactions with the government, policymakers, and government agencies. **Environmental, Social, and Governance (ESG):** Experience related to ESG matters.

In addition to the skills and expertise listed above, the Nominating/Corporate Governance Committee and the board also believe that the following key attributes are important to an effective board:

- Integrity and demonstrated high ethical standards
- Sound judgment
- Analytical skills
- Ability to engage management and each other in a constructive and collaborative fashion
- Commitment to devoting significant time and energy to service on the board and its committees

In evaluating potential director nominees, the Nominating/Corporate Governance Committee considers the applicable qualifications. The committee then considers the contribution they would make to the quality of the board's decision making and effectiveness. The Nominating/Corporate Governance Committee will also consider potential director candidates recommended by stockholders in the same manner as other candidates. The shareholder nomination process is described under Business for 2025 Annual Meeting in DXC's FY24 Proxy Statement. This committee may retain from time to time third-party search firms to identify qualified director candidates and to assist the Nominating/Corporate Governance Committee in evaluating candidates identified by others. (Source: <a href="https://d18rn0p25nwr6d.cloudfront.net/CIK-0001688568/024a8fec-1f9e-4d95-8742-0f988b4fdda3.pdf">https://d18rn0p25nwr6d.cloudfront.net/CIK-0001688568/024a8fec-1f9e-4d95-8742-0f988b4fdda3.pdf</a>)



# **Disclosure 2-11: Chair of the Highest Governance Body**

- a. Reporting whether the chair of the highest governance body is also a senior executive in the organization: Currently, our board leadership structure consists of an independent chairman of the board, a chief executive officer (CEO), and independent committee chairs. On December 19, 2023, David Herzog, at the time a member of the DXC Board of Directors and the lead independent director, was appointed to serve as independent chairman of the board.
- b. If the chair is also a senior executive, explain their function within the organization's management, the reasons for this arrangement, and how conflicts of interest are prevented and mitigated: Not applicable

# Disclosure 2-12: Role of the Highest Governance Body in Overseeing the Management of Impacts

a. Describe the role of the highest governance body and of senior executives in developing, approving, and updating the organization's purpose, value or mission statements, strategies, policies, and goals related to sustainable development:

The governance of DXC's ESG program is a multitiered process involving the board, members of our executive staff, and internal leadership.

- Our board provides oversight of our ESG program, enabling us to have the governance, longterm strategy, and processes to manage ESG outcomes and meet the needs of our stakeholders.
- The Nominating/Corporate Governance Committee has specific oversight of ESG.
- The Nominating/Corporate Governance Committee reviews ESG matters, including climaterelated impacts, risks, opportunities and issues, and information security matters at each quarterly committee meeting and subsequently shares this information with members of the full board.
- An ESG update is provided to the full board annually. (Source: <a href="https://d18rn0p25nwr6d.cloudfront.net/CIK-0001688568/024a8fec-1f9e-4d95-8742-0f988b4fdda3.pdf">https://d18rn0p25nwr6d.cloudfront.net/CIK-0001688568/024a8fec-1f9e-4d95-8742-0f988b4fdda3.pdf</a>)
- b. Describe the role of the highest governance body in overseeing the organization's due diligence and other processes to identify and manage the organization's impacts on the economy, environment, and people:

We are committed to maintaining the highest standards of corporate governance. The board's responsibilities include, but are not limited to:

- · Overseeing the management of our business and the assessment of our business risks
- Overseeing the processes for maintaining integrity of our financial statements and other public disclosures, and compliance with law and ethics
- Reviewing and approving our major financial objectives and strategic and operating plans, and other significant actions
- Overseeing our talent management and succession planning

The board discharges its responsibilities through regularly scheduled meetings as well as telephonic meetings, action by written consent, and other communications with management, as appropriate. DXC expects directors to attend all meetings of the board and the board committees upon which they serve, and all annual meetings of DXC's stockholders at which the directors are standing for election or reelection as directors.

We are committed to providing transparency about our board and committee evaluation process. Our board uses a multipart process for its ongoing self-evaluation to ensure that the board is operating effectively and that its processes reflect best practices:

• **Annual self-evaluations:** The Nominating/Corporate Governance Committee oversees the annual evaluation of the board and each committee. Each director completes a



comprehensive questionnaire evaluating the performance of the board as a whole and of the committees on which the director serves. The directors' responses are aggregated and anonymized to encourage the directors to respond candidly and to maintain the confidentiality of their responses. The chairman, together with the chair of the Nominating/Corporate Governance Committee, summarizes the directors' responses about the performance of the board as a whole and the committees and shares the findings with the board. The annual evaluation process provides the board with valuable insight regarding areas where the board believes it functions effectively and, more importantly, areas where the board believes it can improve.

- External evaluator: From time to time, our board evaluation process includes an external
  evaluator.
- **Individual director assessments:** From time to time, the board conducts individual assessments on a rotating basis, whereby up to four directors are evaluated for purposes of providing individual developmental feedback.

In addition, the Nominating/Corporate Governance Committee periodically assesses the collective skills and experiences of our board, comparing them to the company's long-term strategy.

The board of directors provides oversight on DXC's ESG issues, including climate-related risks, opportunities, and concerns, and ensures we have the governance, long-term strategy, and processes to manage ESG outcomes that meet the needs of stakeholders.

Within the DXC Board of Directors, the Nominating/Corporate Governance Committee has specific oversight of ESG and climate-related matters. The Nominating/Corporate Governance Committee charter, last reviewed in October 2024, outlines the oversight responsibility for ESG issues. The committee reviews ESG matters, including climate-related risks, opportunities, and issues, at each quarterly committee meeting and subsequently shares this information with members of the full board. An ESG update to the full board is provided annually. All directors have access to the committee materials posted to the board portal.

c. Describe the role of the highest governance body in reviewing the effectiveness of the organization's processes as described in 2-12-b, and report the frequency of this review: The board discharges its responsibilities through regularly scheduled meetings as well as telephonic meetings, action by written consent, and other communications with management, as appropriate. DXC expects directors to attend all meetings of the board and the board committees upon which they serve, and all annual meetings of DXC's stockholders at which they are standing for election or reelection as directors. (Source: SEC filing — 10-K 2024)

During the fiscal year ended March 31, 2024, the full DXC Board of Directors held 12 meetings, the Audit Committee held 9 meetings, the Compensation Committee held 6 meetings, and the Nominating/Corporate Governance Committee held 5 meetings. No DXC director on the board as of March 31, 2024, attended fewer than 96% of the aggregate of (1) the total number of board meetings that occurred while they were a member of the board, and (2) the meetings held by each board committee while they served as a member. Each of the DXC directors then serving, except for Mukesh Aghi and Amy Alving who were not standing for re-election, attended the 2023 Annual Meeting of Stockholders, as consistent with our Guidelines. (Source: SEC filing — 10-K 2024)

# Disclosure 2-13: Delegation of Responsibility for Managing Impacts

a. Describe how the highest governance body delegates responsibility for managing the organization's impacts on the economy, environment, and people:

The governance of DXC's ESG program is based on a multitiered process involving the DXC Board of Directors, the ESG Executive Steering Committee and the ESG Working Group. Each of these governing bodies performs a critical role in ensuring our approach incorporates broad perspectives to address our stakeholder needs while delivering on our commitment to sustainable business.



The board of directors provides oversight on DXC's ESG issues, including climate-related risks, opportunities and concerns, and ensures we have the governance, long-term strategy, and processes to manage ESG outcomes that meet the needs of stakeholders.

Within the DXC Board of Directors, the Nominating/Corporate Governance Committee has specific oversight of ESG and climate-related matters. The Nominating/Corporate Governance Committee charter outlines the oversight responsibility for ESG issues. The committee reviews ESG matters, including climate-related impacts, risks, opportunities, and issues, at each quarterly committee meeting and subsequently shares this information with members of the full board. An ESG update to the full board is provided annually.

The president and CEO is the senior-most executive at DXC. The CEO drives the organization's overall business strategy, setting the tone and direction for all ESG matters, including climate-related objectives. The CEO is regularly briefed on ESG matters as they pertain to strategic objectives and decisions, and provides high-level direction to ensure alignment across the organization.

The CEO has delegated the execution of DXC's ESG program to the chief operating officer (COO), who is responsible for overseeing initiatives, programs, and policies related to the company's ESG and climate strategy. The COO influences related initiatives that have a significant impact on the company's overall carbon footprint; these include DXC's data center optimization program, shifting our colleagues to a largely virtual business model, and advancing our circular economy engagement through optimization of IT asset refurbishment and recycling programs. Together, these programs will reduce DXC employees' daily work commutes, business travel, and overall energy consumption, thereby reducing GHG emissions. (Source: FY24 DXC TCFD Report)

b. Describe the process and frequency for senior executives or other employees to report back to the highest governance body on the management of the organization's impacts on the economy, environment, and people:

DXC's global leadership team, which comprises members of the C-suite and regional business executives, ensures that ESG outcomes are aligned with stakeholder needs. The global leadership team is updated regularly on the broad ESG issues affecting the business. They provide input on the long-term strategy and drive initiatives in the various business areas they oversee.

DXC's ESG Executive Steering Committee is the primary governance body guiding DXC's cross-functional ESG strategy. Committee members include the executive vice president and chief operating officer, executive vice president and chief human resources officer, executive vice president and chief financial officer, executive vice president and general counsel, the vice president of ESG, and P&L leaders, as issues dictate. The majority of the ESG Executive Steering Committee members report directly to the CEO. The committee meets quarterly to discuss ESG commitments, strategies and goals.

#### Responsibilities include:

- Supporting DXC's ongoing commitment to ESG matters
- Promoting ESG program alignment with business processes and decisions
- Guiding the development of ESG program strategy, risks, and goals
- Setting and overseeing corporate targets
- Monitoring and anticipating evolving ESG requirements and appropriate responses
- Providing disclosure guidance

For additional information, please see the FY24 DXC TCFD Report.



# Disclosure 2-14: Role of the Highest Governance Body in Sustainability Reporting

- a. Report whether the highest governance body is responsible for reviewing and approving the reported information, including the organization's material topics, and if so, describe the process for reviewing and approving the information:
  - The DXC Board of Directors Nominating/Corporate Governance Committee receives updates at each meeting from the COO or other C-level executives on ESG matters impacting the business, including investor-related issues and ESG ratings, risks, and opportunities. At the beginning of each fiscal year, ESG strategy and priorities are discussed and confirmed with the committee. Within the year, the committee receives regular updates on the most pressing risks and issues facing the business, including climate-related matters. These updates are subsequently shared with the full board after each committee meeting. All targets are approved by the committee, and progress against the targets and priorities is reviewed throughout the year.
- b. If the highest governance body is not responsible for reviewing and approving the reported information, including the organization's material topics, explain the reason for this: This is not applicable, as the highest governance body is responsible for reviewing and approving the reported information.

# **Disclosure 2-15: Conflicts of Interest**

- a. Describe the processes for the highest governance body to ensure that conflicts of interest are prevented and mitigated: The DXC Code of Conduct, Conflicts of Interest (COI) Policy, and our DXC Values require our directors, officers, executives, employees, and representatives to disclose all known, apparent, or potential conflicts of interest to DXC, as they arise. Conflict disclosures must be notified to line management and to DXC Integrity (the Ethics and Compliance function). Additionally, DXC requires employees to complete an annual COI Disclosure Questionnaire, which helps to highlight any situations that may present an actual or potential COI. Once they are disclosed, COI disclosures are evaluated and dispositioned in a timely manner. This allows DXC employees to proactively communicate any actual or perceived COI, but also facilitates DXC taking appropriate measures to mitigate risk.
- b. Report whether conflicts of interest are disclosed to stakeholders: Aggregated investigation case metrics (which may include cases regarding conflicts of interest) and aggregated data from the COI Disclosure Questionnaire responses are provided periodically to the board of directors. Additionally, our Integrity Committee, composed of senior leadership, provides oversight for the Investigations and COI Disclosure Questionnaire process, receiving periodic updates.

# **Disclosure 2-16: Communication of Critical Concerns**

- Describe whether and how critical concerns are communicated to the highest governance a. body: DXC Integrity reports on the implementation and effectiveness of DXC's Ethics and Compliance and Global Data Protection programs to the board of directors and senior leadership. DXC Integrity, under the authority of the chief ethics and compliance officer, is chartered by the board of directors to promote an organizational culture that encourages ethical conduct and a commitment to compliance with the DXC Code of Conduct, with internal company policies, and with the law, wherever DXC conducts business. DXC Integrity is also chartered to exercise due diligence to prevent and detect criminal and unethical conduct and to coordinate investigations of known or suspected criminal and unethical conduct globally, through the promotion and use of DXC's always-available, confidential, anonymous, toll-free, and web-enabled advice and reporting channel, called the SpeakUp Line. This channel is available to all directors, officers/executives, managers, employees, and representatives of DXC (including external contractors, suppliers, and their employees) around the world to report known or suspected violations of the Code of Conduct, DXC policies, and the law and/or to seek ethical advice and quidance, as described at www.speakupdxc.com.
- b. Report the total number and nature of critical concerns that were communicated to the highest governance body during the reporting period: DXC Technology is a publicly traded



U.S. corporation. Any material incidents, investigations, proceedings, complaints, or lawsuits have been notified, as required, to the U.S. SEC. Those filings are publicly available on the SEC website.

# Disclosure 2-17: Collective Knowledge of the Highest Governance Body

a. Report measures taken to advance the collective knowledge, skills, and experience of the highest governance body on sustainable development: The board recognizes the importance of its members keeping current on DXC and industry issues and of their responsibilities as directors. All new directors attend orientation training soon after being elected to the board. Also, the board encourages attendance at continuing education programs, which may include internal strategy or topical meetings, third-party presentations, and externally offered programs. (Source: SEC filing — 10-K 2024)

# Disclosure 2-18: Evaluation of the Performance of the Highest Governance Body

- a. Describe the processes for evaluating the performance of the highest governance body in overseeing the management of the organization's impacts on the economy, environment, and people: We are committed to providing transparency about our board and committee evaluation process. Our board uses a multipart process for its ongoing self-evaluation to ensure that the board is operating effectively and that its processes reflect best practices:
  - Annual self-evaluations: The Nominating/Corporate Governance Committee oversees the annual evaluation of the board and each committee. Each director completes a comprehensive questionnaire evaluating the performance of the board as a whole and of the committees on which the director serves. The directors' responses are aggregated and anonymized to encourage the directors to respond candidly and to maintain the confidentiality of their responses. The chairman, together with the chair of the Nominating/Corporate Governance Committee, summarizes the directors' responses about the performance of the board as a whole and the committees and shares the findings with the board. The annual evaluation process provides the board with valuable insight regarding areas where the board believes it functions effectively and, more importantly, areas where the board believes it can improve.
  - External evaluator: From time to time, our board evaluation process includes an external evaluator.
  - **Individual director assessments:** From time to time, the board conducts individual assessments on a rotating basis, whereby up to four directors are evaluated for the purposes of providing individual developmental feedback.

In addition, the Nominating/Corporate Governance Committee periodically assesses the collective skills and experiences of our board, aligning them to the company's long-term strategy.

- b. Report whether the evaluations are independent and on the frequency of the evaluations: The Nominating/Corporate Governance Committee oversees the annual evaluation of the board and each committee. Each director completes a comprehensive questionnaire evaluating the performance of the board as a whole and of the committees on which the director serves. The directors' responses are aggregated and anonymized to encourage the directors to respond candidly and to maintain the confidentiality of their responses. The chairman, together with the chair of the Nominating/Corporate Governance Committee, summarizes the directors' responses about the performance of the board as a whole and the committees and shares the findings with the board. The annual evaluation process provides the board with valuable insight regarding areas where the board believes it functions effectively and, more importantly, areas where the board believes it can improve. Our board evaluation process includes an external evaluator from time to time.
- c. Describe actions taken in response to the evaluations, including changes to the composition of the highest governance body and organizational practices: The Nominating/Corporate Governance Committee periodically assesses the collective skills and



experiences of our board, aligning them to our long-term strategy. (Source: <u>SEC filing — 10-K</u> 2024)

#### **Disclosure 2-19: Remuneration Policies**

- a. Describe the remuneration policies for members of the highest governance body and senior executives: Please see our FY24 Proxy for further details: SEC Filing Definitive Proxy Statement 2024.
- b. Describe how the remuneration policies for members of the highest governance body and senior executives relate to their objectives and performance in relation to the management of the organization's impacts on the economy, environment, and people: Please see our FY24 Proxy for further details: SEC Filing Definitive Proxy Statement 2024.

#### Disclosure 2-20: Process to Determine Remuneration

- a. Describe the process for designing its remuneration policies and for determining remuneration: Please see our most recent 10-K statement for further details: <u>SEC Filing Definitive Proxy Statement 2024.</u>
- b. Report the results of votes of stakeholders (including shareholders) on remuneration policies and proposals, if applicable: Please find this information here: <u>2024 SEC Form 8-K.</u>

# **Disclosure 2-21: Annual Total Compensation Ratio**

- a. Report the ratio of the annual total compensation for the organization's highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual): Please find more information here: SEC Filing Definitive Proxy Statement 2024.
- b. Report the ratio of the percentage increase in annual total compensation for the organization's highest-paid individual to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual): Please find more information here: SEC Filing Definitive Proxy Statement 2024.
- c. Report contextual information necessary to understand the data and how the data has been compiled: Please find more information here: <u>SEC Filing Definitive Proxy Statement</u> 2024.

# 2.4 Strategy, Policies, and Practices

# **Disclosure 2-22: Statement on Sustainable Development Strategy**

a. Report a statement from the highest governance body or most senior executive of the organization about the relevance of sustainable development to the organization and its strategy for contributing to sustainable development: Please see DXC's Commitment to the Paris Agreement (<a href="https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Paris-Agreement-commitment.pdf">https://dxc.com/content/dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Paris-Agreement-commitment.pdf</a>) and our UN Global Compact Letter (<a href="https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/UN\_Compact\_Letter\_Signed.pdf">https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/UN\_Compact\_Letter\_Signed.pdf</a>).

# **Disclosure 2-23: Policy Commitments**

- a. Describe its policy commitments for responsible business conduct: The DXC Code of Conduct reflects our values and identity and sets expectations and requirements for ethical and legally compliant conduct. Our values are the fabric of DXC. They bind us together, regardless of where or how we work, and they position us to succeed.
  - **Deliver:** We do what we say we are going to do.
  - Do the right thing: We act with integrity.



- Care: We take care of each other and foster a culture of inclusion and belonging.
- Collaborate: We work as a team globally and locally.
- **Community:** We believe in stewardship and building a sustainable company that supports our communities.

As we deliver excellence for our customers and colleagues around the world, our ability to serve them depends on an uncompromising commitment to doing the right thing and acting with integrity. The Code of Conduct applies equally to everyone working at, with, or on behalf of DXC. Underpinned by specific policies, the Code of Conduct provides detailed guidance to help our colleagues identify and safely navigate areas of potential risk, make responsible decisions, and conduct themselves ethically: <a href="https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/leadership-and-governance/Code%20of%20Conduct%20English%20(American).pdf">https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/leadership-and-governance/Code%20of%20Conduct%20English%20(American).pdf</a>.

DXC maintains numerous policies that focus on responsible business conduct. DXC annually publishes a Modern Slavery Statement and a Human Rights Statement. The DXC Human Rights Statement was developed in accordance with the tenets of the United Nations (UN) Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the UN Universal Declaration of Human Rights. DXC is a member of the UN Global Compact. In their own terms, the commitments stated in these instruments refer to both conducting due diligence and respecting human rights. DXC's approach to human rights encourages our colleagues, business partners, and suppliers to go beyond legal compliance, drawing on internationally recognized standards to advance social and environmental responsibility and business ethics. Please see our Human Rights Statement and our Modern Slavery Statement for further details:

- DXC Human Rights Statement: <a href="https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Human-rights-statement.pdf">https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Human-rights-statement.pdf</a>
- DXC Modern Slavery Statement: <a href="https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Modern-slavery-statement.pdf">https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Modern-slavery-statement.pdf</a>
- b. Describe its specific policy commitment to respect human rights: The DXC Board of Directors is committed to the protection and advancement of human rights and ensuring that our operations in communities around the world function with integrity. This commitment is provided through DXC's Human Rights Statement: <a href="https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Human-rights-statement.pdf">https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Human-rights-statement.pdf</a>.

DXC is committed to minimizing the risk of all forms of forced labor and human trafficking within our global business and supply chain. DXC forbids any form of slavery, human trafficking, forced labor, or child labor, and we comply with applicable laws prohibiting such exploitation, as outlined in the DXC Modern Slavery Statement: <a href="https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Modern-slavery-statement.pdf">https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Modern-slavery-statement.pdf</a>.

The DXC Code of Conduct includes our commitment to human rights through respect, inclusion, and belonging: <a href="https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/leadership-and-governance/Code%20of%20Conduct%20English%20(American).pdf">https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/leadership-and-governance/Code%20of%20Conduct%20English%20(American).pdf</a>.

- c. Provide links to the policy commitments if publicly available, or, if the policy commitments are not publicly available, explain the reason for this: Please see the following statements for more information:
  - DXC Human Rights Statement: <a href="https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Human-rights-statement.pdf">https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Human-rights-statement.pdf</a>
  - DXC Modern Slavery Statement: <a href="https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Modern-slavery-statement.pdf">https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Modern-slavery-statement.pdf</a>
  - DXC Code of Conduct: <a href="https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/leadership-and-governance/Code%20of%20Conduct%20English%20(American).pdf">https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/leadership-and-governance/Code%20of%20Conduct%20English%20(American).pdf</a>
  - DXC's Commitment to the Paris Agreement: <a href="https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Paris-Agreement-commitment.pdf">https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Paris-Agreement-commitment.pdf</a>



• DXC Environmental Policy: <a href="https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC%20Environmental%20Policy%202024.pdf">https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC%20Environmental%20Policy%202024.pdf</a>

We publish our disclosures on our ESG web page: <a href="https://dxc.com/us/en/about-us/corporate-responsibility/disclosures">https://dxc.com/us/en/about-us/corporate-responsibility/disclosures</a>.

- d. Report the level at which each of the policy commitments was approved within the organization, including whether this is the most senior level: Approval for all aspects of our Code of Conduct is provided by the board's Audit Committee. Any material changes to the Code of Conduct must be reviewed and approved by the Audit committee. Our Modern Slavery Statement is approved by the director and chair of the Nominating/Corporate Governance Committee of the DXC Board of Directors.
- e. Report the extent to which the policy commitments apply to the organization's activities and to its business relationships: Our global master services agreements and contracts include our Responsible Supply Chain Principles, which reference human rights, modern slavery/human trafficking, ethical business practices, and environmental stewardship. Our purchase order terms and conditions (POTAC) also include these important fundamental business practices. The DXC Responsible Supply Chain Principles align with our Code of Conduct and drive our commitment to fostering sustainable business practices across our global network. We are serious about our environmental, social, and financial responsibilities, and we strive to develop good relationships with suppliers who also take them seriously. The DXC Responsible Supply Chain Principles cover six main categories:
  - Respecting the basic human rights of employees
  - Enforcing labor standards and prohibiting child labor
  - Prohibiting corruption and bribery
  - Environmental protection
  - Anti-discrimination and inclusion
  - · Systems and processes to ensure success in these areas

Our suppliers are required to adhere to the DXC Responsible Supply Chain Principles. DXC also expects its suppliers to adhere to relevant national, regional, and international laws and standards. These cover human rights, health and safety, fair labor practices, conflict minerals, the environment and biodiversity, bribery and corruption, and equality.

Our global policies and processes are applicable to all DXC entities. We have well-defined policies and processes at every stage of source-to-settle in the supply chain, which includes supplier contracting and purchasing policy, supplier data management, sourcing, and contracting processes for engaging a vendor.

f. Describe how the policy commitments are communicated to workers, business partners, and other relevant parties: The DXC Code of Conduct — published in 24 languages — and our policies and statements are available 24x7 to employees on our internal information channels. Many of these documents are publicly available to customers and stakeholders on our external ESG web page (please see response to Disclosure 2-23-c): <a href="https://dxc.com/us/en/about-us/corporate-responsibility/disclosures">https://dxc.com/us/en/about-us/corporate-responsibility/disclosures</a>.

DXC requires all employees to complete the company's annual Code of Conduct training. As of August 2024, 100% of active DXC employees had completed the training. DXC also offers training on supply chain transparency to employees through our online learning portal, DXC Learning. To foster education on social topics, we have established two academies on DXC Learning. Our ESG academy includes general training on modern slavery and country-specific training (e.g., Australia and UK). The DXC Academy for Inclusion and Belonging offers courses on behaviors that create an inclusive culture and also sensitizes people to modern slavery issues. Other topics, such as mental health awareness and wellbeing, are also included. DXC employees completed more than 4 million hours of learning through instructor-led training, virtual instructor-led training, and web-based training in FY24.



# **Disclosure 2-24: Embedding Policy Commitments**

a. Describe how it embeds each of its policy commitments for responsible business conduct throughout its activities and business relationships: We recognize the importance of providing our employees and business partners with resources and tools that help them do the right thing. To help guide decisions and achieve desirable outcomes, DXC's Code of Conduct establishes the policies by which we conduct business. They provide a framework for ethical behavior in complex situations. These policies are cascaded throughout our framework of policies governing individual subject matter areas.

The DXC Responsible Supply Chain Principles speak to the commitments we make to our customers and our business relationships built on trust and personal responsibility. They establish the standards required for conducting business with DXC. DXC's Human Rights Statement was developed in accordance with the tenets of the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Universal Declaration of Human Rights:

https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Supply-chain-principles.pdf.

DXC is committed to minimizing the risk of all forms of forced labor and human trafficking within our global business and supply chain. DXC forbids any form of slavery, human trafficking, forced labor, or child labor, and we comply with applicable laws prohibiting such exploitation, as outlined in the DXC Modern Slavery Statement: <a href="https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Modern-slavery-statement.pdf">https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Modern-slavery-statement.pdf</a>.

DXC Integrity conducts ethics and compliance-related training for all active employees around the globe, with a completion rate of 100% in FY24. All new hires are required to take the training within 30 days of onboarding.

# **Disclosure 2-25: Processes to Remediate Negative Impacts**

- a. Describe its commitments to provide for or cooperate in the remediation of negative impacts that the organization identifies it has caused or contributed to: We are committed to operating in a manner that protects the environment and the health and safety of our employees, contractors, customers, and the communities in which we conduct business. DXC meets or exceeds applicable compliance obligations, customer commitments, and environmental requirements to which we subscribe.
- b. Describe its approach to identify and address grievances, including the grievance mechanisms that the organization has established or participates in: The DXC Values, Code of Conduct, and policies set the expectation that employees, and anyone working with or on behalf of DXC, should seek advice and report misconduct. We strive to create an inclusive, supportive culture that encourages speaking up without fear of retaliation. DXC does not tolerate direct or indirect retaliation against anyone seeking advice or reporting a concern. DXC provides several channels for people to seek advice or report concerns. These channels include:
  - The relevant employee's supervisor, their supervisor's manager, or any other individual in the management chain
  - SpeakUp Line at www.speakupdxc.com
  - SpeakUp mailbox at speakup@dxc.com
  - Human Resources Employee Connect
  - DXC Response Operations Center (DROC)
  - DXC Legal

The DXC SpeakUp Line allows individuals to report without revealing their identity (subject to local law). The option to remain anonymous using the SpeakUp Line is available by phone, web portal, or mobile app. The DXC SpeakUp Line is also open to our suppliers, contractors, and their employees. DXC Integrity oversees these various platforms and channels to help DXC



employees, contractors, and others raise questions or concerns, and help with the early identification and management of issues.

c. Describe other processes by which the organization provides for or cooperates in the remediation of negative impacts that it identifies it has caused or contributed to: DXC has reaffirmed its commitment to the Ten Principles of the UN Global Compact on human rights, labor standards, protection of the environment, and anti-corruption. DXC is focused on delivering excellence for our customers and colleagues, and we are committed to improving the communities in which we live and work. We express our ongoing support to advance the Ten Principles within our company and those we influence.

Confidentiality, anonymity, and DXC's stance on retaliation: We know there may be some reluctance to ask questions or report misconduct. For this reason, we offer multiple channels to increase people's comfort with asking questions or reporting misconduct. Where permitted by law, a report can be made anonymously. Also, in our efforts to resolve reported issues, DXC controls access to reported information, allowing its distribution only to those who need it to properly investigate misconduct. DXC expressly forbids retaliation, direct or indirect, against any employee who in good faith reports misconduct or participates in a company investigation of misconduct. DXC conducts a fair and thorough review of all actionable concerns, while maintaining employee confidence and confidentiality to the extent the law permits, and protecting employee personal data, as appropriate and in accordance with the DXC Privacy Policy and the SpeakUp Line guidelines.

- d. Describe how the stakeholders who are the intended users of the grievance mechanisms are involved in the design, review, operation, and improvement of these mechanisms: DXC strives for continuous improvement in our support programs, processes, and communications. Our DXC intranet contains numerous contacts for a variety of inquiries where suggestions, issues, or concerns can be addressed.
- e. Describe how the organization tracks the effectiveness of the grievance mechanisms and other remediation processes, and report examples of their effectiveness, including stakeholder feedback: DXC conducts various benchmarking studies by tracking data points related to employee survey feedback, integrity investigations (which leads to targeted training activities), customer surveys, and partner surveys. This allows for trend analysis as a means of continuous improvement as it relates to a variety of grievances or issues. Input is continually solicited as to the grievance mechanism's accessibility and ease of use. DXC Integrity also manages a standard and formalized issue management and remediation process that is grounded in root cause analysis and drives actions for required mitigation. Metrics related to this process are tracked and reported to senior executives.

# Disclosure 2-26: Mechanisms for Seeking Advice and Raising Concerns

- a. Describe the mechanisms for individuals to:
  - i. seek advice on implementing the organization's policies and practices for responsible business conduct
  - ii. raise concerns about the organization's business conduct

The DXC Values, Code of Conduct, and policies set the expectation that employees, and anyone working with or on behalf of DXC, should seek advice and report misconduct — whether witnessed or suspected.

We strive to create an inclusive, supportive culture that encourages speaking up without fear of retaliation. DXC does not tolerate direct or indirect retaliation against anyone seeking advice or reporting a concern. DXC provides several channels for people to seek advice or report concerns. These channels include:

• The relevant employee's supervisor, their supervisor's manager, or any other individual in the management chain



- SpeakUp Line at <a href="https://www.speakupdxc.com">www.speakupdxc.com</a>
- SpeakUp mailbox at <a href="mailto:speakup@dxc.com">speakup@dxc.com</a>
- Human Resources Employee Connect
- DXC Response Operations Center (DROC)
- DXC Legal

The SpeakUp Line allows individuals to report without revealing their identity (subject to local law). The option to remain anonymous using the SpeakUp Line is available by phone, web portal, or mobile app. The DXC SpeakUp Line is also open to our suppliers, contractors, and their employees.

DXC Integrity oversees these various platforms and channels to help DXC employees, contractors, and others with raising questions or concerns, and help with the early identification and management of issues.

# **Disclosure 2-27: Compliance with Laws and Regulations**

- a. Report the total number of significant instances of noncompliance with laws and regulations during the reporting period, and a breakdown of this total by:
  - i. instances for which fines were incurred
  - ii. instances for which nonmonetary sanctions were incurred

DXC Technology is a publicly traded U.S. corporation. Any material incidents, investigations, proceedings, complaints, or lawsuits have been notified, as required, to the U.S. SEC. Those filings are publicly available on the SEC website.

- b. Report the total number and the monetary value of fines for instances of noncompliance with laws and regulations that were paid during the reporting period, and a breakdown of this total by:
  - i. fines for instances of noncompliance with laws and regulations that occurred in the current reporting period: DXC had no material fines for noncompliance with laws and regulations in FY24.
  - ii. fines for instances of noncompliance with laws and regulations that occurred in previous reporting periods: DXC had no material fines for noncompliance with laws and regulations in FY24.

# **Disclosure 2-28: Membership Associations**

a. Report industry associations, other membership associations, and national or international advocacy organizations in which it plays a significant role:

DXC maintains memberships with or otherwise engages with the following organizations (note: AmCham, listed for several regions, refers to the American Chamber of Commerce):

#### **DXC Global**

- The Open Group
- Signatory of Cybersecurity Tech Accord
- UN Global Compact Network Inc.
- SustainableIT.org

#### **DXC America**

- APQC (American Productivity & Quality Center)
- Cornell University
- Disability:IN
- Stanford University
- Where Women Work



# **DXC Australia/New Zealand**

- Australian Information Industry Association (AIIA)
- Australian Network on Disability
- Business Council of Australia (BCA)
- Committee for Economic Development of Australia (CEDA)
- CEDA ESG Community of Best Practice
- Diversity Council of Australia
- Supply Nation
- Trans-Tasman Business Circle
- The National Press Club

### **Project specific Member- and Partnerships**

# DXC Dandelion Program

- Autism Australia
- Autism NZ
- Autism SA
- Autism WA
- Autism Queensland

# DXC First Nations Program (Australia)

- Kinaway (Victorian Indigenous Business Chamber of Commerce) Platinum Partner
- Reconciliation Australia
- NSW Indigenous Chamber of Commerce

# DXC Veterans Program

- Platinum partner, Soldier On
- Signed the pledge with AmCham's "Give a vet a go" program
- Signed on for the Prime Minister's Veteran Employment Program
- Signed the Fortem First Responders Pledge

### DXC Māori and Pacific Peoples Program

- Te Matarau The Māori Tech Association
- Te Mana Raraunga Māori Data Sovereignty Network (in the process of registration)

# **DXC** Austria

- AmCham in Austria
- Austrian Digital Value (ADV)

# **DXC Belgium**

- Agoria
- Attentia VZW
- DXC Digital masterclass (Antwerp University and Ghent University)
- · Plug and Play Maritime

#### **DXC Brazil**

Girls in IT

#### **DXC Denmark**

- AmCham in Denmark
- Dansk Erhverv



# **DXC France**

- Agefiph
- FITEC
- IDATE DigiWorld
- Ivy Club

# **DXC Germany**

- Initiative D21 e.V.
- Plug&Play StartUp Autobahn
- Plug&Play Retail

# **DXC Hungary**

- Business Council for Sustainable Development in Hungary (BCSDH)
- National Association of Managers
- The John von Neumann Computer Society

## **DXC** Italy

- Ambrosetti
- Anitec-Assinform Italy
- CEOforLIFE
- CoderDojo Association
- Member of Confindustria

#### **DXC** Lithuania

AmCham in Lithuania

## **DXC Netherlands**

- Allemaal Digitaal
- Digital Ecosystem Institute
- Opnieuw
- Werkwaardig

#### **DXC Poland**

- Association of Business Service Leaders (ABSL)
- Bird & Bird
- Husarski Michalski Tax Consultancy
- UnitedLEX

# **DXC Portugal**

- Associação Portuguesa para o Desenvolvimento das Comunicações (APDC)
- Associação Portuguesa para a Promoção da Segurança da Informaçã (AP2SI)
- Câmara do Comércio Americana em Portugal (AmCham)
- Forum de Administradores e Gestores de Empresas (FAE)
- Fundação EDP
- Global Enabling Sustainability Initiative (Digital with Purpose) (GeSI)
- Happy Code collaboration agreement for programing scholarships
- Instituto Politécnico de Setúbal (IPS) collaboration agreement for scholarships

# **DXC Romania**

- AmCham in Romania
- Association of Business Service Leaders (ABSL)



#### **DXC Serbia**

- AmCham in Serbia
- Chamber of Commerce and Industry of Serbia

# DXC Slovakia

- AHK Slovakia an open case, potentially removed for next calendar year
- AmCham in Slovakia
- IT Asociácia Slovenska (ITAS)
- Nadácia Pontis
- Slovak Compliance Circle (SCC)
- Partnerstvá Pre Prosperitu (PPP)

### **DXC Spain**

- @ASLAN
- Asociación de Usuarios de SAP España (AUSAPE)
- Asociación Española de Usuarios de Telecomunicaciones y de la Sociedad de la Información (AUTELSI)
- Asociación Española de Directivos de Sostenibilidad (DIRSE)
- Asociación Española de Empresas de Consultoría (AEC)
- Asociación de Directivos de Comunicación (DIRCOM)
- Asociación para el Progreso de la Dirección (APD)
- Asociación de Compañías de Experiencia con Cliente (CEX)
- Barcelona global
- Cercle Tecnològic de Catalunya
- Club de Calidad de Asturias
- Fundación Integralia DKV
- Fundación Adecco
- Fundación ONCE
- Fundación Diversidad
- Festibity
- Human Age Institute

#### **DXC Sweden**

Jobbsprånget

#### **DXC Switzerland**

- AmCham in Switzerland
- eCH Verein eGovernment Standards
- Swiss IT Intelligence Communities (SITIC)
- Swico

#### **DXC United Kingdom**

- ADS Group (Aerospace, Defence, Security and Space) industry body
- Armed Forces Covenant/ERS
- Chatham House
- Disability Confident
- Green Software Foundation
- Royal United Services Institute (RUSI)
- Founding member of Government Digital Sustainability Alliance (GDSA) Charter; member of the GDSA Circular Economy Working Group
- techUK



#### **DXC Vietnam**

AmCham in Ho Chi Minh City

# 2.5 Stakeholder Engagement

# Disclosure 2-29: Approach to Stakeholder Engagement

**Describe its approach to engaging with stakeholders:** DXC engages in business-to-business and business-to-government commerce. Our key stakeholders include customers, suppliers, investors, employees, and the communities in which we conduct business. We engage with these stakeholders in the following ways.

**Customers:** Customer engagement occurs formally through customer satisfaction surveys and informally through daily work discussions. We participate in customer-sponsored conferences and events, and respond to regular information requests. We continually monitor these information sources to align services, delivery models, and solutions to customer needs.

**Suppliers:** We engage with suppliers strategically and transactionally depending on the needs of the business. We establish working relationship expectations through the DXC Responsible Supply Chain Principles, monitor compliance through risk-specific due diligence programs, and partner with critical suppliers to align specific business outcomes for the needs of our customers.

**Investors:** As a publicly held company, DXC conducts quarterly earnings calls and publishes financial and ESG disclosures in accordance with mandatory regulatory requirements and voluntary frameworks. DXC executives regularly hold meetings with investors to discuss a variety of topics, which may include business strategy, business structure, and financial performance. As investor interests dictate, ESG topics may also be discussed. At any time, investors or the general public may email inquiries about DXC's commitments and performance to <a href="mailto:lnvestor-Relations@DXC.com">lnvestor-Relations@DXC.com</a>.

**Employees:** We seek to maintain ongoing transparent and open communications with our employees by using various internal communication channels. We conduct employee surveys and use feedback to identify key trends, successes, and opportunities for improvement.

**Communities:** We engage in numerous community outreach efforts to contribute beneficial outcomes for the communities in which we live and work. Our programs include innovative technology solutions, youth and adult educational programs, and region-specific volunteerism. We have long-term partnerships with nonprofit organizations, and for over 10 years, our award-winning DXC Dandelion Program has connected neurodiverse people with meaningful employment.

# **Disclosure 2-30: Collective Bargaining Agreements**

- a. Report the percentage of total employees covered by collective bargaining agreements (CBAs): We do not report on the percentage of employees who are covered by CBAs (or on those who are covered by other forms of employee representation).
- b. For employees not covered by CBAs, report whether the organization determines their working conditions and terms of employment based on CBAs that cover its other employees or based on CBAs from other organizations: Terms of employment for employees who are not covered by CBAs are based on individual negotiations and the local legal framework.



# **GRI 201: Economic Performance**

# Disclosure 201-1: Direct Economic Value Generated and Distributed

Please see DXC's 2024 Annual Report:

https://s27.q4cdn.com/120381974/files/doc financials/2024/ar/dxc-annual-report-2024.pdf.

# Disclosure 201-2: Financial Implications and Other Risks and Opportunities Caused by Climate Change

DXC recognizes the need to measure, interpret, and analyze climate risks and opportunities to inform our efforts internally and for our customers to combat environmental degradation. For details on DXC's climate-related risks, opportunities, and financial implications, please see our 2024 CDP Climate Change Questionnaire report: <a href="https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/Environmental-Social-and-Governance-CDP-Report.pdf">https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/Environmental-Social-and-Governance-CDP-Report.pdf</a>.

# Disclosure 201-3: Defined Benefit Plan Obligations and Other Retirement Plans

This information varies by country. For a description of the company's pension and other benefit plans, please refer to DXC's 2024 Annual Report:

https://s27.q4cdn.com/120381974/files/doc\_financials/2024/ar/dxc-annual-report-2024.pdf.

# Disclosure 201-4: Financial Assistance Received from the Government

We are currently the beneficiary of state and local government incentives in New Orleans, Louisiana (USA), related to our Digital Transformation Center located there; these incentives expire in various fiscal years through 2028.

# **GRI 204: Procurement Practices**

#### **Management Approach Disclosures for Procurement Practices**

DXC Technology's suppliers form an integral part of our sustainability strategy, which is why the <a href="DXC">DXC</a> Responsible Supply Chain Principles were established. The principles cover six categories: human rights; labor conditions; anti-corruption concerns; environmental protection; equality, inclusion and belonging; and systems and processes. These principles speak to the commitments we make to our customers and the relationships we build, based on trust and personal responsibility. They establish the standards required for conducting business with DXC.

Accordingly, our goal is to work with our suppliers to ensure their full compliance with these principles as they in turn apply the principles to suppliers with whom they work to deliver goods and services for DXC. We consider these principles during contract negotiation with suppliers, and DXC reserves the right to monitor supplier processes and procedures against these principles as part of DXC's ongoing Responsible Supply Chain Program.

DXC engages small businesses in the spirit of good citizenship and growing the global economy. The result is a win for all involved and adds value for our customers.

DXC's procurement management system enables us to manage spending with our suppliers, including small and minority-owned businesses globally.

# **Disclosure 204-1 Proportion of Spending on Local Suppliers**

DXC procures goods and services from suppliers in more than 70 countries. Our sourcing strategies incorporate a combination of global, regional, and local suppliers to meet the needs of our customers most effectively. We do not have a preference for local suppliers; instead, we look at our business needs to optimize supplier selection. Our supply chain mirrors our customers and colleagues: global, diverse, and inclusive. DXC engages small businesses in the spirit of good citizenship and growing the global economy.



# **GRI 205: Anti-Corruption**

# **Management Approach Disclosures for Anti-Corruption**

DXC Technology has an anti-corruption program with a dedicated global team, under the leadership of the chief ethics and compliance officer and director of regulatory compliance. The program includes policies, procedures, and training on applicable anti-bribery and anti-corruption laws, third-party risk management, gifts and hospitality disclosure requirements, and the conflicts-of-interest reporting process. The elements of this program are stated in the DXC Code of Conduct and Code of Conduct training, which all employees are required to complete annually. Additional training in anti-corruption, gifts and hospitality, and third-party risk management is given to employees and business partners who work in high-risk regions and/or hold certain roles within the organization.

Our policy on anti-corruption states that we will compete fairly for business solely on the merits of our competitive offerings. Employees are prohibited from bribing anyone to obtain, retain, or direct business, or to secure any other improper advantage. Neither DXC nor any of its associated persons, commercial intermediaries, or other third parties will make or be a party to any improper payments. Third-party commercial intermediaries will be engaged only with a written agreement and only after a satisfactory evaluation of a comprehensive, risk-based, independent due diligence inquiry regarding business integrity. DXC policy requires that all business development gift and/or hospitality expenditures be recorded accurately and completely in DXC's books and records, where no false, misleading, incomplete, inaccurate, or artificial entries are to be knowingly made for any reason.

# Disclosure 205-1: Operations Assessed for Risks Related to Corruption

DXC takes practical actions to assess risk in our operations, including risks related to corruption in third-party relationships, gifts and hospitality provided or received by employees, and conflicts of interest. DXC complies with the U.S. Foreign Corrupt Practices Act (FCPA) and the United Kingdom Bribery Act (UKBA). Beyond the transnational reach of the FCPA and UKBA, DXC also abides by the local anti-bribery and anti-corruption statutes of other nations, almost all of which have some form of anti-bribery law to prohibit improper payments to government officials of any payment amount. DXC maintains policies and process controls for risk areas such as business amenities and contributions, use of third parties, facilitation payments, and money laundering.

DXC's Third-Party Risk Management processes for anti-corruption require that certain categories of third parties undergo continuous risk assessment to identify corruption risks and risk mitigation activities. DXC uses various factors in our risk assessment, including Corruption Perceptions Index (CPI) scores, size of the business, use of third parties, the type of business, and public sector involvement.

DXC's Gifts and Hospitality process requires the disclosure of certain gifts received and provided by DXC employees and contractors. The policy establishes limits where certain gifts, including meals for customers, etc., are prohibited or must be disclosed to DXC Integrity.

DXC's Code of Conduct, company policies, and our values require DXC directors, officers, executives, employees, and representatives to disclose all known or potential conflicts of interest to DXC as they arise. Conflict disclosures must be notified to line management and DXC Integrity. Once they are disclosed, conflicts are evaluated and dispositioned in a timely manner. Agreements to eliminate, avoid, or otherwise mitigate conflicts of interest shall be well documented. DXC competes vigorously and fairly for business solely on the merits of our competitive offerings. DXC shall not offer, promise, give, or accept money or anything of value to or from government officials, political parties, or commercial-sector parties to improperly obtain or retain business, secure an improper advantage, or otherwise influence improper action.

# Disclosure 205-2: Communication and Training About Anti-Corruption Policies and Procedures

DXC requires all employees to complete our annual mandatory Code of Conduct training, which includes a segment on anti-corruption. For FY24, 100% of active DXC colleagues completed the annual training. Additional live training in anti-corruption, gifts and hospitality, and third-party risk management was given



to employees and business partners who work in DXC-perceived high-risk regions in FY24. DXC also offers optional training on supply chain transparency to employees through our online learning portal, DXC Learning.

# **Disclosure 205-3: Confirmed Incidents of Corruption and Actions Taken**

It is DXC's policy not to disclose information on investigations of suspected cases of corruption. DXC's policy on anti-corruption can be summarized as follows: DXC has zero tolerance for bribery, kickbacks, and other improper payments. We are committed to succeeding on the merits of our competitive offerings and the value we bring to customers. For this reason, we do not make bribes or kickbacks or take these from anyone to obtain, retain, or direct business, or to secure any other business advantage — nor does the company permit any other person or entity to do so on our behalf — at any time, in any public or private sector market, or in any circumstance.

# **GRI 206: Anticompetitive Behavior**

# Management Approach Disclosures for Anti-Competitive Behavior

As a large multinational corporation doing business across the globe, from time to time DXC may be involved in various legal proceedings in the ordinary course of business. As a U.S. public company, DXC discloses any material legal matters in its corporate filings, as required by U.S. regulations. During the reporting period for FY24, DXC did not have any material legal actions regarding anti-competitive behavior or violations of anti-trust and monopoly legislation in which the organization has been identified as a participant. The DXC Anti-Trust & Competition Compliance Policy covers anti-competitive behavior, anti-trust, and monopoly practices. We are committed to the principles of fair competition and the regulation of activities to ensure compliance with anti-trust protections. As such, our policy requires compliance with laws governing economic regulation in the countries in which we operate, and the preservation of a competitive and free enterprise system.

# Disclosure 206-1: Legal Actions for Anticompetitive Behavior, Antitrust, and Monopoly Practices

Number of legal actions pending or completed during the reporting period regarding anticompetitive behavior and violations of antitrust and monopoly: DXC had no pending or completed material legal actions relating to anti-competitive or anti-trust behavior in FY24.

Main outcomes of completed legal actions, including any decisions or judgments: Not applicable

# GRI 207: Tax 2019

#### **Management Approach Disclosures for Tax**

For information on how DXC manages tax, please see our 2024 Annual Report.

# Disclosure 207-1: Approach to Tax

As a multinational corporation doing business in more than 70 countries, our approach to tax includes our commitment to being compliant with numerous, complex, and ever-changing tax rules and reporting requirements while maintaining a tax-efficient profile in a manner that also contributes to the communities in which we operate. We use a combination of in-house and external resources based in several countries to operate our tax function.

# Disclosure 207-2: Tax Governance, Control, and Risk Management

DXC Technology assesses tax risk based on both local country and U.S. tax reporting and accounting standards (e.g., ASC 740, ASC 450, International Financial Reporting Standards [IFRS], Organization for Economic Co-operation and Development [OECD]) and various guidelines prescribed by various government or regulatory agencies for internal controls (e.g., Sarbanes-Oxley [SOX], Committee of



Sponsoring Organizations [COSO] framework, or similar local country guidelines), including testing of controls and reporting through our internal audit and SOX functions.

For detailed information on DXC Technology's policies and provision for income taxes and internal controls, see various references in our 2024 Annual Report.

# Disclosure 207-3: Stakeholder Engagement and Management Concerns Related to Tax

See Item 1A, "Risk Factors," in <u>SEC filing — 10-K 2024</u>, filed with the U.S. Securities and Exchange Commission.

# **Disclosure 207-4: Country-by-Country Reporting**

We comply with U.S. and OECD guidelines for reporting financial, economic, and tax-related information in the jurisdictions in which we operate.

# **Environmental Disclosures**

# **GRI 3: Disclosures on Material Topics**

# 3-1: Process to Determine Material Topics

- a. Describe the process followed to determine material topics, including:
  - i. How it has identified actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights, across its activities and business relationships;

In 2024 DXC undertook its first Double Materiality Assessment (DMA), aligned to the European Union (EU) Corporate Sustainability Reporting Directive (CSRD) European Sustainability Reporting Standards (ESRS), namely the double materiality principles in ESRS 1 and European Financial Reporting Advisory Group (EFRAG) implementation guidance.

As a starting point for DXC's DMA, we used the comprehensive list of sustainability matters listed in ESRS AR16, which consists of 10 topics, 37 sub-topics and sub-sub-topics related to select sub-topics. We also referenced other sources to identify entity-specific matters, which included the Sustainability Accounting Standards Board (SASB) standards for the Software & IT Services Industry, the Global Reporting Initiative (GRI) sector-specific standards for Group 3: Transport infrastructure, tourism, and software sub-sector, DXC's 2023 United Nations Sustainable Development Goals, and sector-specific peer benchmarking.

As part of our DMA approach, we developed a value chain map consisting of DXC's business activities, partners, and stakeholders to capture the full spectrum of activities, resources, and relationships integral to DXC's business model and the external environment in which it operates. This mapping included:

- Documentation Review: Internal and external documents were reviewed to identify relevant business activities and stakeholder interactions.
- Activity Mapping: The activities involved in creating products or services were mapped out, from conception through delivery, consumption, and end-of-life. This mapping provides a clear visual representation of the value chain.



- **Resource Identification:** Resources utilized in each stage of the value chain were identified. This includes both tangible and intangible assets that support the business processes.
- **Relationship Analysis:** The relationships between various stakeholders, including suppliers, partners, and customers, were analyzed to understand how these interactions contribute to the overall value chain.
- Reporting for Completeness and Consistency: The conclusions were documented and reviewed by the DMA working group to check the value chain mapping is both complete and consistent with DXC's operations.

By following this structured approach, the analysis not only highlights the essential activities and resources but also clarifies the interconnectedness of various stakeholders in the value creation process.

Key stakeholders and subject matter experts were engaged to provide input based on topical expertise, market location, knowledge of the business, and engagement with external stakeholders. These internal stakeholders were mapped to specific topics and provided information throughout the assessment based on their area of expertise.

For each sub-topic and key sub-sub-topics, impact, risk, and opportunity statements (IROs) were crafted with consideration given to short-, medium, and long-term horizons.

IROs were subsequently rated on a predefined scale for impact and financial materiality, and the results were vetted with key executives.

# ii. How it has prioritized the impacts for reporting based on their significance;

For this most recent fiscal year, those IROs (and associated sub-topics) ranking in the top 20th percentile were selected as material topics.

# b. Specify the stakeholders and experts whose views have informed the process of determining its material topics.

DXC's ESG and Enterprise Risk Management (ERM) leaders led the DMA process. Key stakeholders and subject matter experts from HR, Facilities Management, Data Center, Legal, Health & Safety, Information Security, Data Protection, Supply Chain, and Community Outreach were engaged to provide input based on topical expertise, market location, knowledge of the business and engagement with external stakeholders. These internal stakeholders were mapped to specific topics and provided information throughout the assessment based on their area of expertise.

# 3-2: List of Material Topics

#### a. List of material topics:

DXC's identified material topics align with the topics and sub-topics identified in the CSRD ESRS guidance on materiality and include climate matters, own-workforce working conditions, own-workforce equal treatment, own-workforce work-related rights, the working conditions of workers in our value chain, and data privacy. Double materiality topics are reviewed annually and may change if business conditions change.

# b. Changes to the list of material topics compared to the previous reporting period.

DXC undertook its first Double Materiality Assessment in 2024, which changed the approach used to determine material topics. DXC now identifies material topics based on the topics and sub-topics defined by the CSRD ESRS guidance.

# 3-3: Management of Material Topics

DXC's Double Materiality process and identified material topics will be reviewed annually.



# **GRI 300: GRI Environmental Topics**

# **Management Approach Disclosures for Energy and Emissions**

As a global IT services leader, DXC has both an opportunity and a duty to provide our customers, colleagues, and communities with solutions that address the global climate crisis. We are stewards of the world we live in and strive to create a livable legacy for generations to come. We see technology as a tool for enabling the lasting change and radical transformation needed to create a climate-secure future. Our environmental strategy focuses firstly on reducing emissions related to our operations, secondly on reducing emissions related to the services we provide, and thirdly on helping our customers reduce their emissions.

DXC's most significant environmental impacts relate to carbon emissions associated with energy consumption from our facilities. Management of these environmental impacts is done in accordance with our environmental policy, ISO 14001, and ISO 50001. DXC is committed to responsible consumption and production and, accordingly, has set ambitious targets to reduce our climate change impacts. These include a 65% reduction of Scope 1 and 2 emissions by 2030 against our FY19 baseline, which has been validated by the Science Based Targets initiative (SBTi), and a recently added target to achieve net zero emissions for direct operations by 2050. We have also set a target for 75% of our suppliers by spend (covering purchased goods and services and capital goods) to commit to or set their own science-based targets by the end of 2027. (Source: DXC SBTi certification:

https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC\_Certificate\_SBTi.pdf)

Energy and emissions disclosures are calculated using the Greenhouse Gas Protocol and disclosed in alignment to the CDP, TCFD, SASB, and GRI frameworks. DXC's annual GHG inventory is third-party validated for limited assurance against the ISO 14064-3:2019 standard.

(https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-ISO-14064-3-Verification-Statement.pdf)

# **GRI 301: Materials**

# Management Approach Disclosures for Materials — ITAD

While DXC is an IT services provider, provision of electronic hardware and infrastructure equipment (desktop computers, laptop computers, printers, monitors, and servers) is sometimes included in the services we provide. As part of DXC's Environmental Strategy, we aim to minimize electronic waste. We partner with global IT asset refurbishers/recyclers to maximize the life of IT equipment and minimize electronic waste for our customers and for DXC. When IT assets have met their useful life, they are sent to a refurbish/recycle partner for assessment. After assessment, our partners employ a three-stage approach:

- 1. Where assets meet certain specifications, equipment is refurbished and redeployed to extend its useful life.
- 2. Where items are below the specification, items are sold.
- 3. If refurbishment or resale is not feasible, equipment is broken down and recycled.

DXC has multiple approved global partners to manage the collection and recycling of e-waste from DXC and customer operations around the world. These suppliers apply the highest standards for the secure and environmentally compliant disposition of DXC's retired IT assets as well as the assets of DXC's customers.

As part of our social value program, and often in partnership with customers, DXC also donates refurbished hardware to schools and charities around the world. These donations are instrumental in enabling digital literacy in the communities in which we live and work.



# **Disclosure 301-1: Materials Used by Weight or Volume**

DXC is an IT services provider and does not manufacture or package materials.

# **Disclosure 301-2: Recycled Input Materials Used**

DXC is an IT services provider and does not manufacture or package materials.

# **Disclosure 301-3: Reclaimed Products and Their Packaging**

# Percentage of Reclaimed Products and Their Packaging Materials for Each Product Category

In FY24, approximately 225,000 pieces of IT equipment were refurbished or recycled. Of these units, approximately 156,000 pieces (approximately 70%) were refurbished to extend the useful life. The remaining units were recycled (approximately 30%).

**a. How the data for this disclosure has been collected:** Data has been reported to us from our IT asset disposition (ITAD) providers.

# **GRI 302: Energy**

# **Management Approach Disclosures for Energy**

DXC's primary consumption of energy is related to offices and data centers. Management of energy is done in accordance with our environmental policy, ISO 14001, and ISO 50001.

Energy and emissions disclosures are calculated using the Greenhouse Gas Protocol and disclosed in alignment to the CDP, TCFD, SASB, and GRI frameworks. DXC's annual GHG inventory (which includes energy consumption) is third-party validated for limited assurance against the ISO 14064-3:2019 standard.

# **Disclosure 302-1: Energy Consumption Within the Organization**

- a. Total FY24 fuel consumption within DXC from non-renewable sources, in joules or multiples, including fuel types used:
- b. Total FY24 fuel consumption within DXC from renewable sources, in joules or multiples, including fuel types used:
- c. Total joules, watt-hours, or multiples (consumed):

## **FY24 Energy Consumption**

	MWh from renewable sources	MWh from nonrenewable sources	Total MWh (renewable and nonrenewable sources)
Consumption of fuel (excluding feedstock)	0	59,544	59,544
Consumption of purchased or acquired electricity	449,680	337,711	787,391
Consumption of purchased or acquired steam	0	5,385	5,385
Consumption of purchased or acquired cooling	0	466	466
Consumption of self-generated non-fuel renewable energy	647	0	647
Total energy consumption MWh	450,327	403,106	853,433
Total energy consumption Gigajoules (GJ)	1,621,177	1,451,183	3,072,360



## **FY24 Renewable Energy**

MWh
263,459
181,431
4,790
647
450,327
1,621,177

- d. Total joules, watt-hours, or multiples (energy sold):
  - i. electricity sold none
  - ii. heating sold none
  - iii. cooling sold none
  - iv. steam sold none
- e. Total energy consumption within DXC, in joules or multiples: 853,433 MWh/3,072,360 GJ
- f. Standards, methodologies, assumptions, and/or calculation tools used:

DXC's energy and emissions are reported in accordance with the Greenhouse Gas Protocol and are third-party verified for limited assurance to the ISO 14064-3:2019 standard. Sites over which we have operational control and that are larger than 2,000 square feet are within the scope of Scope 1 and 2 reporting. Energy consumption is determined by supplier invoices wherever possible. Where utility invoices are not available (e.g., when billed to the landlord for smaller sites), DXC estimates consumption based on average consumption per square foot for like facility types (e.g., data center or office) within the same country.

# g. Source of the conversion factors used:

DXC uses the carbon accounting system Persefoni to calculate energy and emissions from fuel and electricity invoice level data. Where energy consumption is not provided by the supplier, Persefoni conversion tables are automatically applied to calculate energy consumption from fuel quantity.

# Disclosure 302-2: Energy Consumption Outside the Organization

We are not able to convert some of our emissions data to energy (e.g., where we use a spend-based methodology). We have instead provided here our Scope 3 emissions data:

**FY24 Scope 3 Emissions** 

Scope	Emissions in tCO2e
Scope 3 Total	972,464
Cat 1 – Purchased goods & services	594,010
Cat 2 – Capital goods	211,164
Cat 3 – Fuel and energy-related activities	86,106
Cat 4 – Upstream transportation & distribution	12,758
Cat 5 – Waste generated in operations	3,976
Cat 6 – Business travel	22,884
Cat 7 – Commuting & remote working	39,674
Cat 8 – Upstream leased assets	263
Cat 13 – Downstream leased assets	1.628



# **Disclosure 302-3: Energy Intensity**

- **a. Energy intensity ratio for the organization:** FY24 energy intensity was 62.43 MWh/revenue (\$millions)
- b. Organization-specific metric (the denominator) chosen to calculate the ratio: \$13,670 revenue (\$millions)
- c. Types of energy included in the intensity ratio; whether fuel, electricity, heating, cooling, steam, or all: Fuels, electricity, heating, and cooling consumed in DXC operated facilities or fleet vehicles
- d. Whether the ratio uses energy consumption within the organization, outside of it, or both: Within the organization

# **Disclosure 302-4: Reduction of Energy Consumption**

- a. Amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples: 4,075,335 GJ since our FY19 baseline
- b. Types of energy included in the reductions; whether fuel, electricity, heating, cooling, steam, or all: Fuels, electricity, heating, and cooling consumed in DXC-operated facilities or fleet vehicles
- c. Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it: DXC uses FY19 as the baseline for energy and emissions reporting.
- **d. Standards, Methodologies, Assumptions, and/or Calculation Tools Used:** We align our reporting to the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard.

# Disclosure 302-5: Reductions in Energy Requirements of Products or Services Not applicable

# **GRI 303: Water and Effluents**

#### **Management Approach Disclosures for Water and Effluents**

As DXC is an IT services company, our primary use of water is related to kitchen and bathroom use in office facilities and related to cooling for some of our data centers. Management of energy is done in accordance with our environmental policy. Water withdrawal is disclosed in alignment to the SASB and GRI frameworks.

Many of the facilities DXC occupies are leased facilities, where access to water meters is not under our control. Water is consumed from mains water systems, with wastewater returning to the sewerage network. Where DXC has direct responsibility for site water management, consumption is regularly analyzed and managed. We aim to minimize our withdrawal of water and implement actions to improve efficiency, which include equipment upgrades, timely maintenance, and employee education on water conservation.

# Disclosure 303-1: Interactions with Water as a Shared Resource

Water is consumed as a resource procured from third-party water companies globally and provided via a mains water supply. DXC employees use water as part of their day-to-day activities, and some of our data centers use water for cooling.

# **Disclosure 303-2: Management of Water Discharge-Related Impacts**

Not applicable



# **Disclosure 303-3: Water Withdrawal**

a. Total water withdrawal from all areas in ML and a breakdown of this total by the following sources, if applicable:

i. Surface water: 0 MLii. Groundwater: 0 MLiii. Seawater: 0 ML

iv. Produced water: 0 ML

v. Third-party water: 408 ML, from mains suppliers

b. Total water withdrawal from all areas with water stress in ML and a breakdown of this total by the following sources, if applicable:

i. Surface water: 0ii. Groundwater: 0iii. Seawater: 0

iv. Produced water: 0

v. Third-party water: 139 ML, from mains suppliers

# Disclosure 303-4: Water discharge

a. Total water discharge from all areas in megaliters, and a breakdown of this total by the following sources, if applicable:

i. Surface water: 0 megalitersii. Groundwater: 0 megalitersiii. Seawater: 0 megaliters

iv. Produced water: 0 megaliters

v. Third-party water: 408 ML to sewerage network

b. Total water discharge to all areas with water stress in megaliters: 139 ML

No chemicals or substances of concern are contained within the discharged water and for which DXC requires any permits.

# **Disclosure 303-5: Water Consumption**

- a. Total water consumption from all areas in ML: 0 ML
- b. Total water consumption from all areas with water stress in ML: Not applicable
- c. Change in water storage in ML, if water storage has been identified as having a significant water-related impact: Not applicable

# **GRI 305: Emissions**

# **Disclosure 305-1: Direct (Scope 1) GHG Emissions**

- a. Scope 1 emissions: FY24 Scope 1 emissions were 18,018 tCO<sub>2</sub>e
- b. Gases included in the calculation; whether  $CO_2$ ,  $CH_4$ ,  $N_2O$ , hydrofluorocarbons (HFCs), PFCs, SF<sub>6</sub>, NF<sub>3</sub>, or all:  $CO_2$ ,  $CH_4$ ,  $N_2O$ , and HFCs



- c. Biogenic CO<sub>2</sub> emissions in metric tons of CO<sub>2</sub> equivalent: Not applicable
- d. Base year for the calculation, if applicable:
  - i. DXC Technology's baseline year for carbon emissions reporting and target setting is FY19.
  - ii. Scope 1 emissions in the base year FY19: 70,222 tCO<sub>2</sub>e
- e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source: Scope 1 emissions were calculated using UK DEFRA emission factors. In FY24, the Intergovernmental Panel on Climate Change (IPCC) (AR5 100 year) warming potential was used.
- f. Consolidation approach for emissions; whether equity share, financial control, or operational control: Operational control
- g. Standards, methodologies, assumptions, and/or calculation tools used: We align our reporting to the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard. Emissions are third-party verified in accordance with ISO 14064-3:2019. Sites over which we have operational control and that are larger than 2,000 square feet are within the scope of Scope 1 and 2 reporting. Consumption of fuels is determined by supplier invoices.

#### Disclosure 305-2: Energy Indirect (Scope 2) GHG Emissions

- a. Gross location-based energy indirect (Scope 2) GHG emissions in metric tons of CO<sub>2</sub> equivalent: In FY24, Scope 2 location-based emissions were 260,582 tCO<sub>2</sub>e.
- b. If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO<sub>2</sub> equivalent: In FY24, Scope 2 market-based emissions were 125,889 tCO<sub>2</sub>e.
- c. If available, the gases included in the calculation; whether CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub>, or all: CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O
- d. Base year for the calculation, if applicable:
  - DXC Technology's baseline year for carbon emissions reporting and target setting is FY19.
  - ii. Scope 2 emissions in base year FY19: Location based 806,180 tCO<sub>2</sub>e; market based 609.839 tCO<sub>2</sub>e
- e. Source of the emission factors and the GWP rates used, or a reference to the GWP source: Scope 2 emissions were calculated using U.S. EPA eGRID Sub Region emission factors for electricity consumed by U.S.-based facilities, UK DEFRA emission factors for electricity consumed by UK-based facilities, and IEA International Electricity Factors for electricity consumed in all other regions. In FY24, the Intergovernmental Panel on Climate Change (IPCC) (AR5 100 year) warming potential was used.
- f. Consolidation approach for emissions; whether equity share, financial control, or operational control: Operational control
- g. Standards, methodologies, assumptions, and/or calculation tools used: We align our reporting to the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard. Emissions are third-party verified in accordance with ISO 14064-3:2019. Sites over which we have operational control and that are larger than 2,000 square feet are within the scope of Scope 1 and 2 reporting. Electricity consumption is determined by supplier invoices wherever possible. Where utility invoices are not available (e.g., when billed to the landlord for smaller sites), DXC estimates consumption based on average consumption per square foot for like facility types (e.g., data center or office) within the same country.

#### Disclosure 305-3: Other Indirect (Scope 3) GHG Emissions

a. Gross other indirect (Scope 3) GHG emissions in metric tons of CO<sub>2</sub> equivalent: In FY24 Scope 3 emissions were 972,464 tCO<sub>2</sub>e.



- b. If available, the gases included in the calculation; whether CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub>: CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O
- c. Biogenic CO<sub>2</sub> emissions in metric tons of CO<sub>2</sub> equivalent: Not applicable
- d. Other indirect (Scope 3) GHG emissions categories and activities included in the calculation: For FY24 we are reporting Purchased Goods and Services, Capital Goods, Fuel and Energy-Related Activities not included in Scope 1 or Scope 2 (FERA), Upstream Transportation & Distribution, Waste Generated in Operations, Business Travel, Employee Commuting and Remote Working, Upstream Leased Assets, and Downstream Leased Assets. Scope 3 reporting for prior years can be found in our TCFD report: <u>DXC Task Force on Climate-related Financial Disclosures</u> (TCFD) Report Environmental-Social-and-Governance-TCFD-Report.pdf.
- e. Base year for the calculation:
  - i. DXC Technology's baseline year for carbon emissions reporting and target setting is FY19.
  - ii. Scope 3 emissions in the base year FY19: 2,243,200 tCO2e
- f. Source of the emission factors and the GWP rates used, or a reference to the GWP source: DXC uses various emission factors depending on the category of emissions being calculated. U.S. Environmental Protection Agency (EPA) EEIO factors are used for purchased goods and services, capital goods, and upstream transportation. Most remaining Scope 3 categories are calculated using UK DEFRA emission factors. In FY24, the Intergovernmental Panel on Climate Change (IPCC) (AR5 100 year) warming potential was used.
- g. Standards, methodologies, assumptions, and/or calculation tools used: We align our reporting to the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard. Emissions are third-party verified in accordance with ISO 14064-3:2019. Various methodologies are used to determine Scope 3 emissions by category. Details on our methodologies can be found in DXC's FY24 CDP Climate Change Questionnaire Report.

#### **Disclosure 305-4: GHG Emissions Intensity**

- **a. GHG emissions intensity ratio for the organization:** FY24 (including Scope 1 and 2): 20.38 metric tons CO<sub>2</sub>e/revenue (\$millions)
- b. Organization-specific metric (the denominator) chosen to calculate the ratio: \$13,670 revenue (\$millions)
- c. Types of GHG emissions included in the intensity ratio: All Scope 1 and 2 emissions
- d. Gases included in the calculation: CO<sub>2</sub>, N<sub>2</sub>O, and CH<sub>4</sub>

#### Disclosure 305-5: Reduction of GHG Emissions

- a. GHG emissions reduced as a direct result of reduction initiatives, in metric tons of CO<sub>2</sub> equivalent: 1,868,538 tCO<sub>2</sub>e reduction from FY19 to FY24
- b. Gases included in the calculation; whether CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub>, or all: CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, and HFCs
- **c. Base year or baseline, including the rationale for choosing it:** FY19 data has been used as the baseline year for these calculations.
- d. Scopes in which reductions took place; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3): Scope 1, 2, and 3
- e. Standards, methodologies, assumptions, and/or calculation tools used: We align our reporting to the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard.



#### Disclosure 305-6: Emissions of Ozone-Depleting Substances (ODS)

DXC uses refrigerants in data center chillers (also called F-gas) and reports carbon emissions related to refrigerant consumption as part of our Scope 1 emissions reporting (please see **Disclosure 305-1**). Less than 0.1% of consumed refrigerants in FY24 were categorized as ozone depleting.

#### Disclosure 305-7: Nitrogen Oxides (NOx), Sulfur Oxides (SOx), and Other

a. Significant air emissions, in kilograms or multiples, for each of the following:

i. NOx: 6,831 kgii. SOx: 16 kg

- iii. Persistent organic pollutants (POPs): Not applicable
- iv. Volatile organic compounds (VOCs): 1,254 kg
- v. Hazardous air pollutants (HAPs): Not applicable
- vi. Particulate matter (PM): 115 kg
- vii. Other standard categories of air emissions identified in relevant regulations: Not applicable
- **b. Source of the emission factors used:** National Atmospheric Emissions Inventory: Fleet Weighted Road Transport Emission Factor 2021
- **c. Standards, methodologies, assumptions, and/or calculation tools used:** We used the Road Transport Emission Factors: 2021 UK National Atmospheric Emissions Inventory to calculate air emissions from fleet (diesel and petrol vehicles only) based on kilometers traveled.

#### GRI 306: Waste

#### **Management Approach Disclosure for Waste**

DXC's largest waste stream originates from the offices and data centers we operate and consists of general office waste, kitchen waste, and to a lesser degree, the disposal of end-of-life IT equipment (e.g., computers and servers). Where available, DXC uses recycling services from municipal waste management companies and uses IT asset refurbish/recycle partners to extend the life of IT equipment and resell or recycle what cannot be extended.

We disclose waste-related impacts in alignment with CDP, TCFD, and GRI frameworks.

### Disclosure 306-1: Waste Generation and Significant Waste-Related Impacts

DXC's main waste streams are associated with general office-related waste, electronic waste, and surplus office equipment associated with the closure of offices.

DXC is a virtual-first company, meaning we have a largely remote workforce. Our people are enabled with the technology and tools they need to work securely, virtually, and flexibly. Our virtual-first business model has resulted in a space-efficient property portfolio and has reduced office-related waste generation. Since FY19, we have reduced facilities square footage by 52%.

#### **Disclosure 306-2: Management of Significant Waste-Related Impacts**

Where possible, DXC utilizes office waste recycling options provided by municipal waste management companies. In FY24, approximately 17% of office-related waste was collected for recycling.

We apply this approach to the management of IT asset disposal as well, partnering with global refurbishment/recycling suppliers to either extend the life of IT assets, resell equipment to other consumers, or recycle end-of-life equipment. In FY24, approximately 70% of IT equipment was refurbished for extended use and 30% was recycled.



#### **Disclosure 306-3: Waste Generated**

In FY24, DXC generated 7,797 metric tons of solid waste across the global portfolio.

#### **Disclosure 306-4: Waste Diverted from Disposal**

In FY24, DXC diverted 1,934 metric tons of solid waste from disposal.

#### **Disclosure 306-5: Waste Directed to Disposal**

In FY24, DXC directed 5,863 metric tons of solid waste to disposal.

### **GRI 308: Supplier Environmental Assessment**

#### Management Approach Disclosures for Supplier Environmental Assessment

DXC's suppliers form an integral part of our sustainability strategy, which is why we established the DXC Responsible Supply Chain Principles. The principles speak to the commitments we make to our customers and the relationships we build based on trust and personal responsibility. They are part of our framework of standards for conducting business.

The principles underpin our commitment to fostering sustainable business practices across our global network. We are serious about our environmental, social, and financial responsibilities, and we seek relationships with suppliers who also take these issues seriously. DXC expects suppliers to adhere to relevant national, regional, and international laws and standards.

The principles cover six main categories:

- Respecting the basic human rights of our employees
- Enforcing labor standards and prohibiting child labor
- Prohibiting corruption and bribery
- Protecting the environment
- Fostering inclusion and belonging
- Creating systems and processes to ensure success in these areas

Our suppliers are required to adhere to the principles. We expect suppliers to introduce suitable processes and controls within their organizations to support compliance with applicable laws and regulations, and drive continuous improvements related to the requirements laid out in these principles. Our goal is to work with our suppliers to ensure full compliance with these principles, which includes a requirement that they apply the principles to their own suppliers, those with whom they work to deliver goods and services for DXC.

In accordance with applicable laws, we implement annual supplier surveys designed to gather essential information for our risk management evaluation processes. Suppliers are expected to actively engage in programs aimed at continuous improvement, which may include remediation measures if significant issues are identified. We intend to work with suppliers to remediate issues of concern. If remediation is not possible or successful, we may terminate our contractual activities.

For more details, please see the Responsible Supply Chain page on our website.

## Disclosure 308-1: New Suppliers That Were Screened Using Environmental Criteria

DXC conducts supply chain due diligence based on the materiality and risk profile of the supplier. DXC's material suppliers operate mainly in the IT sector, providing services, software, or hardware to DXC and our customers. In FY24, DXC conducted environmental due diligence to understand the climate-related actions of our largest suppliers. 57% of our suppliers by spend have set or have committed to set science-based targets.



#### Disclosure 308-2: Negative Environmental Impacts in the Supply Chain

Through our FY24 due diligence process, we identified no material supplier performance issues related to environmental impacts within our supply chain.

### **Social Disclosures**

## **GRI 400: GRI Social Topics**

### **GRI 401: Employment**

#### **Management Approach Disclosures for Employment**

In the face of a rapidly changing global landscape marked by persistent macroeconomic pressures, concerns about a slowing economy and potential downturn, and the dynamic geopolitical and economic situation influenced by various global conflicts, DXC Technology remains steadfast in our commitment to addressing these multifaceted challenges for our customers worldwide.

To navigate these complexities — in addition to the rapidly shifting employment landscape — we have refined our approach, placing a strong emphasis on bolstering the cost-effectiveness of our business solutions and pivoting toward building strong talent internally. Innovation has become paramount, and we are proactively modernizing our customers' IT ecosystems to empower them with cutting-edge solutions, helping them maintain a competitive edge in an increasingly demanding marketplace.

Our commitment to attracting and retaining top technology talent is unwavering. We continue to make significant investments in our workforce through initiatives such as techno-thons, certification drives, our AI Academy, and dozens of other academies, all of which provide our employees with the latest technology skills and knowledge to thrive in a rapidly evolving landscape.

We are dedicated to fostering inclusion and belonging, with award-winning leadership and talent development programs and initiatives focused on neurodiversity, including the multiple-award-winning DXC Dandelion Program, which celebrates its 10th anniversary this year. We are also actively developing our managers through programs such as IGNITE@DXC that empower them to lead teams effectively.

We are driving hands-on learning and code challenge programs and technical certification programs to equip our workforce with the skills they need to excel in a technology-driven world. These efforts are complemented by the introduction of a DXC-wide new job architecture program that offers growth opportunities for our colleagues.

As we confront the unique challenges posed by the concerns about a slowing economy and potential downturn, and ongoing global conflicts, we remain committed to our colleagues and our values. Our dedication extends to promoting internal talent and fostering growth opportunities. DXC is resolute in navigating the complexities of the ever-changing landscape with resilience, innovation, and a steadfast commitment to our customers and our colleagues.



### Disclosure 401-1: New Employee Hires and Employee Turnover

a. Total number and rate of new employee hires during the reporting period, by age group, gender, and region:

DXC FY 2024 Hires (April 1, 2023 - March 31, 2024)

Work Location Region and Age Group	Female	Male	Not Declared	Grand Total
Americas				
18 – 24	124	330	1	455
25 – 34	298	758	9	1,065
35 – 44	168	479	5	652
45 – 54	96	312	3	411
55+	86	257	1	344
Americas Total	772	2,136	19	2,927
APJ-MEA*				
18 – 24	1,008	1,212	5	2,225
25 – 34	1,388	2,523	5	3,916
35 – 44	443	1,201		1,644
45 – 54	96	362		458
55+	23	69		92
Undisclosed	1	1		2
APJ-MEA Total	2,959	5,368	10	8,337
Europe				
18 – 24	338	897	6	1,241
25 – 34	831	1,696	3	0.500
	001	1,090	3	2,530
35 – 44	531	940	5	2,530 1,476
35 – 44 45 – 54				
	531	940	5	1,476
45 – 54	531 224	940 535	5	1,476 762
45 – 54 55+	531 224	940 535 228	5	1,476 762 306
45 – 54 55+ Undisclosed Europe	531 224 78	940 535 228 9	5 3	1,476 762 306 9
45 – 54 55+ Undisclosed Europe Total	531 224 78	940 535 228 9	5 3	1,476 762 306 9
45 – 54 55+ Undisclosed Europe Total Global	531 224 78 <b>2,002</b>	940 535 228 9 <b>4,305</b>	5 3 17	1,476 762 306 9 <b>6,324</b>
45 – 54 55+ Undisclosed Europe Total Global 18 – 24	531 224 78 <b>2,002</b>	940 535 228 9 <b>4,305</b>	5 3 17	1,476 762 306 9 <b>6,324</b>
45 – 54 55+ Undisclosed Europe Total Global 18 – 24 25 – 34	531 224 78 <b>2,002</b> 1,470 2,517	940 535 228 9 <b>4,305</b> 2,439 4,977	5 3 17 12 17	1,476 762 306 9 <b>6,324</b> 3,921 7,511
45 – 54 55+ Undisclosed Europe Total Global 18 – 24 25 – 34 35 – 44	531 224 78 <b>2,002</b> 1,470 2,517 1,142	940 535 228 9 <b>4,305</b> 2,439 4,977 2,620	5 3 17 12 17 10	1,476 762 306 9 <b>6,324</b> 3,921 7,511 3,772
45 – 54 55+ Undisclosed Europe Total Global 18 – 24 25 – 34 35 – 44 45 – 54	531 224 78 <b>2,002</b> 1,470 2,517 1,142 416	940 535 228 9 <b>4,305</b> 2,439 4,977 2,620 1209	5 3 17 12 17 10 6	1,476 762 306 9 <b>6,324</b> 3,921 7,511 3,772 1,631

<sup>\*</sup> Asia Pacific, Japan, Middle East and Africa



b. Turnover during the reporting period, by age group, gender, and region: DXC does not disclose attrition metrics.

## Disclosure 401-2: Benefits Provided to Full-Time Employees not Provided to Temporary/Part-Time Employees

Benefits are provided to full-time employees in locations where a local market standard exists and in locations with at least 1,000 full-time employees. Benefits may include:

- Retirement
- Life insurance
- Accident and disability insurance
- Healthcare
- Various paid leave (e.g., maternity, sick, bereavement)
- Paid vacation
- Training and development

#### Disclosure 401-3: Parental Leave

This benefit offering varies country by country.

## **GRI 402: Labor Management Relations**

#### **Management Approach Disclosures for Labor Management Relations**

In compliance with our Human Rights Statement, DXC respects the right to form and join trade unions and bargain collectively in accordance with the law. Our Human Rights Statement is available at <a href="https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Human-rights-statement.pdf">https://dxc.com/content/dam/dxc/projects/dxc-com/us/pdfs/about-us/esg/DXC-Human-rights-statement.pdf</a>.

We recognize trade unions and consult with them on issues that affect the workforce. To that end, our employee relations strategy includes early engagement with trade union representatives and works councils as part of new business activities, with a view to forming an effective working relationship. Collective bargaining between DXC and employee representatives relates to working conditions (e.g., remuneration).

In Europe, we have an established European Works Council (EWC) that meets twice each year (e.g., every 6 months), either face to face or virtually. The EWC is competent for transnational topics (more information is available at <a href="https://www.eurofound.europa.eu/observatories/eurwork/industrial-relations-dictionary/european-works-councils">https://www.eurofound.europa.eu/observatories/eurwork/industrial-relations-dictionary/european-works-councils</a>).

#### Disclosure 402-1: Minimum Notice Periods Regarding Operational Changes

Notice periods relating to significant operational changes are agreed at a country/region level in alignment with the local legal framework, HR, management, trade unions, employee representatives, or works councils, where applicable. We do not track this information at a global level.

### **GRI 403: Occupational Health and Safety**

#### Management Approach Disclosures for Occupational Health and Safety

DXC Technology continues to maintain a corporate global Health and Safety Management System that includes:

- The DXC Health and Safety Policy
- Global and local health and safety programs, including global health and safety objectives

DXC seeks to ensure the mitigation and control of health and safety risks to colleagues, customers, and our community as a key business principle.



The objective of DXC's global Health and Safety Program is to provide governance, oversight, and direction for managing health and safety risks posed by our organizational activities.

We take a holistic approach, with a goal of ensuring a standard of excellence across our operations, as evidenced by our ISO 45001 certifications across a number of global locations, including Australia, China, Germany, Italy, Morocco, and Spain. Our Health and Safety Management System demonstrates DXC's commitment to ensuring decent work conditions, good health, well-being, and equality practices.

We measure progress against a set of key performance indicators (KPIs), which include both leading and lagging indicators. These KPIs are aligned with DXC's health and safety goals and objectives. We regularly report on our progress to DXC's global Health and Safety management team and senior leadership.

DXC offers a global Employee Assistance Program that is free, confidential, and available 24x7 and enables employees from each country where DXC operates to seek professional support. The program offers counseling for a wide range of personal, family, and work-related issues, such as:

- Stress and life pressure
- Life changes and events
- Relationships
- Workplace issues
- Parenting
- Coping with the loss of a loved one
- Referrals to local financial or legal resources
- Maintaining emotional, physical, and psychological balance

#### Disclosure 403-1: Occupational Health and Safety Management System

DXC's comprehensive global Health and Safety Management System is aligned with the ISO 45001 standard. The system includes:

- Global health and safety resources: DXC has a team of experienced health and safety professionals who provide support for all locations around the world.
- Global incident reporting platform: DXC has a secure platform where employees can report work-related incidents. This platform helps DXC identify and address safety risks quickly and effectively.
- Global health and safety programs: DXC's health and safety programs are designed to promote a safe and healthy work environment. These programs include training, hazard identification and control, and emergency response planning.

DXC is committed to continually improving its Health and Safety Management System by evaluating its performance, monitoring results, and conducting periodic management system reviews.

## Disclosure 403-2: Hazard Identification, Risk Assessment, and Incident Investigation

We identify, categorize, and evaluate potential hazards and risks associated with our locations, using the following criteria:

- Type of location and performed activity
- Employee head count working at the location
- · Geographical location and potential impact of natural disasters

Risk assessments are performed on work-related tasks conducted by our employees while considering working environments, regardless of location. Likelihood and severity are assessed when identifying suitable and sufficient control measures.

DXC maintains a global incident reporting platform and encourages employees to report incidents, accidents, and near misses. Incidents reported within the platform are assigned to the appropriate Health and Safety team member, who is assigned as the incident manager. Incidents are investigated, a root



cause analysis is performed, and the issue is managed to closure. Findings are reported to in-country local authorities if required.

In addition, DXC encourages employees to report the following serious incidents/situations immediately:

- Work-related death of/injury to any DXC personnel anywhere
- Kidnapping, missing employee, workplace violence, behavioral concerns, radicalization
- Major terrorist incident, CBRN (chemical, biological, radiological, nuclear) event, or natural disaster (earthquake of magnitude 6.5 or above, tsunami, volcanic eruption, tornado impact)
- Any event or incident that could potentially impact DXC colleagues, reputation, information, and physical assets

When an incident occurs, DXC Resiliency follows the 3P&F (People, Processes, Projects, and Facilities) approach to assess the impact of the incident.

#### **Disclosure 403-3: Occupational Health Services**

DXC complies with all local legal requirements to provide occupational health services through internal and/or external resources to support our employees' health and well-being.

The DXC Employee Assistance Program (EAP) supports our colleagues worldwide. This program is driven by Human Resources, incorporating Health and Safety, and provides other day-to-day assistance support mechanisms. Details of the EAP are provided in the "Management Approach to Disclosures for Occupational Health and Safety" section of this document.

In addition to the global EAP, DXC supports local initiatives that promote the well-being of our colleagues, as mentioned in Disclosure 403-6.

## Disclosure 403-4: Worker Participation, Consultation, and Communication on Occupational Health and Safety

DXC has several mechanisms in place to enable dissemination of information to employees and, where appropriate, consultation and participation of employees and employees' representatives (including works councils and local Health and Safety committees), where they exist.

Worker participation, consultation, and communication are also facilitated through our internal web pages, town halls, and regional communications, and employees can reach out to management and raise concerns through tools such as the SpeakUp Line, the Health and Safety mailbox, and the DXC Resiliency mailbox.

### Disclosure 403-5: Worker Training on Occupational Health and Safety

Health and safety training is determined based on employee work-related tasks and legal requirements and assigned via the global DXC Learning platform or through internal/external training.

When external health and safety training is required, courses are identified and reviewed by the respective Health and Safety lead.

The global DXC Health and Safety team develops training on relevant topics, including:

- · Safety for all staff
- Psychosocial matters
- Emergency preparedness and response
- Working at a customer site
- Ergonomics training
- Safety inspections for Health and Safety committees

#### Disclosure 403-6: Promotion of Worker Health

DXC supports global and local initiatives that promote worker health, including World Mental Health Day and World Well-being Week.



In addition, DXC supports several local initiatives such as Wellness Month, hosts numerous webinars on well-being, promotes sports initiatives, and more. In some countries, DXC supports vaccination campaigns for its employees.

## Disclosure 403-7: Prevention and Mitigation of Occupational Health and Safety Impacts Directly Linked by Business Relationships

DXC senior management promotes a culture across the organization that supports our Health and Safety Management System. DXC senior management also provides the necessary resources to support appropriate health and safety initiatives and programs that align implementation of the DXC Health and Safety Policy with our business objectives and compliance obligations.

Depending on each country's local requirements for employee medical and occupational health screening, employee participation is encouraged.

DXC has a proactive and robust global Crisis Management Program, with a framework of Crisis Management Teams at the country, regional, and global levels available to respond to incidents that meet predefined crisis thresholds. Senior management has designated a crisis management structure that includes representatives and alternates who serve as incident coordinators/commanders as required (Crisis Management Teams).

The DXC Response Operations Center (DROC) hotline is available to DXC employees 24 hours a day, 365 days a year, for reporting and obtaining assistance with urgent matters concerning our people, reputation, and physical and data assets. DROC supports many major languages and has local numbers to make it easier for our people to access assistance.

The goal of effective emergency preparedness and response is to establish planning, prevention, response, and recovery for emergencies and disasters to protect life and property, and to minimize business disruption.

Each site must maintain emergency preparedness and response procedures to identify and manage health and safety emergencies applicable to their site. Sites prepare to respond by planning actions to prevent or mitigate adverse health and safety risks from emergency situations.

## Disclosure 403-8: Workers Covered by an Occupational Health and Safety Management System

All DXC employees, contingent workers, and contractors who work or provide services within DXC sites are covered by the global Health and Safety Management System and are expected to follow all relevant processes and procedures stipulated.

#### Disclosure 403-9: Work-Related Injuries

At DXC, we prioritize incident management and response to prevent incidents from occurring or recurring. We require employees and contractors to report any incidents that include hazards or unsafe work conditions, near misses, and injuries or illnesses that occur at work, regardless of where we work (at a DXC site, at a customer site, during business travel, or when working from home). To facilitate reporting, we have implemented a global Health and Safety platform that enables employees to report workplace-related incidents.

Although injury rate reporting varies from country to country, DXC uses the U.S. Occupational Safety and Health Administration (OSHA) methodology for collecting data.

We use the Lost Workday Rate (LWR) as a standardized metric to measure the total number of working days lost due to occupational injury or illness. The LWR formula is defined as the total number of workdays lost, multiplied by 200,000 and divided by the total number of hours worked by all employees within a given period.

We use the Total Recordable Incident Rate (TRIR) as a standardized metric to measure the total number of recordable injuries or illnesses. The TRIR formula is defined as the total number of recordable injuries



or illnesses, multiplied by 200,000 and divided by the total number of hours worked by all employees within a given period.

Note: The 200,000 figure in both formulas represents the number of hours 100 employees working 40 hours per week, 50 weeks per year would work, and provides the standard base for calculating the incidence rate for an entire year.

The Lost Workday Rate and Recordable Incident Rate decreased in FY24, showing a positive trend, given an increase in incident reporting in the same period.

#### DXC FY24 Lost Workday Rates (April 1, 2023 - March 31, 2024)

Global	0.35
Olobai	0.00

#### DXC FY24 Recordable Incidence Rate (April 1, 2023 – March 31, 2024)

Global	0.021
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#### DXC FY24 Global Incident Data (April 1, 2023 - March 31, 2024)

Global Incident Data	FY24
Total number of incidents	163
Total number of incidents involving DXC employees	78
Total number of fatalities	0
Total number of lost-time injuries (recordable)	9
Total number of lost workdays	408
Total number of recordable incidents	13
Total number of near-miss incidents	2
Fatal accident rate	0.00
Total number of exposure hours	233,834,653

#### Disclosure 403-10: Work-Related III Health

DXC monitors trends or outbreaks of diseases that could affect DXC colleagues in regions where the company operates.

For pandemic planning and response to health and safety emergencies, DXC receives regular updates from many sources, including the World Health Organization, the U.S. Centers for Disease Control and Prevention, the European Centre for Disease Prevention and Control, and various national public health authorities.

DXC also maintains programs for the prevention of musculoskeletal diseases. We provide employees with a platform for ergonomic training and self-assessment. In addition, in some countries, employees can seek advice on different types of health queries or concerns from occupational health doctors, nurses, and health and safety experts.

DXC also has a mental health program that promotes the well-being of our employees.



## **GRI 404: Training and Education**

#### **Management Approach Disclosures for Training and Education**

We view professional and technical development as a key part of our people-first strategy, a strategic investment in our employees' capabilities and the company's ability to deliver excellence for our customers. We understand that delivering excellence for our customers means identifying and promoting the right skills for our employees to grow themselves, grow their teams, grow their customers, and grow DXC. Through our integrated learning ecosystem, DXC Learning, we offer thousands of programs that help our colleagues reskill, upskill, and cross-skill in technical, leadership, business, and language skills.

Since learning occurs in different ways and varies according to cognitive styles, DXC's learning plans offer varied approaches. A typical DXC learning plan may include a blend of online/web-based courses, instructor-led classes, online learning communities, and special assignments, and may result in technology and other certifications, digital/learning badges, and even job changes for some employees.

DXC employees can use videos, courses, and more to learn anywhere, anytime, and on any device. Virtual practice labs enable them to interact and experiment with technology and solutions in low-risk, exploratory environments. In FY24, we continued learning journeys for various cohorts, including enterprise architects, leaders, managers, and new employees.

DXC's Performance Development Framework incorporates a range of processes and actions that enable our employees to contribute to the organization's success, including goal setting, regular feedback and coaching, career development planning, and ongoing performance discussions. We encourage managers to know their team members, focus on developing each employee, enable their performance and career goals, and develop a coaching mindset.

We empower employees to take control of identifying and achieving their career goals through our development planning process.

#### Disclosure 404-1: Average Hours of Training per Year per Employee

In FY24 DXC colleagues completed more than 3.86 million hours of formal learning through instructor-led, virtual instructor-led, and web-based training in DXC Learning.

The average hours of formal training per employee increased in FY24 to 30.33 hours per employee.

## Disclosure 404-2: Programs for Upgrading Employee Skills and Transition Assistance Programs

#### DXC training program highlights for FY24 include the following:

- 45,570 DXC employees completed instructor-led training on DXC Learning.
- 38,840 DXC employees received professional certifications.
- Additionally, DXC employees earned 94,817 professional certificates issued by our partners AWS, Google Microsoft, and others.
- 23,243 colleagues were certified in 43,017 cloud-related certifications.
- 8,000 employees were trained through three independent DXC Early Career Professional programs: BLOOM, SpeakEasy, and Fluentify.
- 92 business-specific training programs were organized through our partners and vendor training program. 3,624 employees participated in these, with 25% of these employees subsequently deployed to new projects.
- 89,853 custom learning badges have been issued for completing learning collections on DXC Learning.
- DXC subject matter experts created and published 4,188 training content pieces on DXC Learning:
   1,533 new courses and 2,655 learning objects and curations to support new (and existing) courses.
- DXC subject matter experts and guilds organized weekly educational sessions and events to introduce core concepts, processes, practices, and DXC tools and resources on key topics in Agile, Microsoft Power BI, and artificial intelligence. They conducted 74 sessions, with more than 3,800 hours of live learning.



 226 employees from Bulgaria, Poland, and Slovakia successfully completed the ongoing SkillUp Certification Program.

#### **Key DXC learning initiatives:**

- **DXC Techno-thon:** This event aims to promote a spirit of innovation across our organization, recognize talent, and encourage employees to engage and collaborate. In FY24, 740 employees attended the event.
- AWS Cloud Carnival: This week-long AWS skills-building event, a collaboration between DXC and AWS, was attended by over 7,000 employees. They accumulated 59,000 learning hours and earned 900+ certifications.
- Launch of Competency Management Framework: This framework provides a systematic approach to managing the competencies and skills of employees.
- **Architect Community Development Program:** This program resulted in 33 new enterprise architects and 60 SAP technical architects.
- Internal Facilitators: The International Association of Facilitators partnered with DXC to enable Facilitation Week 2024, during which 16 sessions were held across DXC, with close to 460 participants.
- Oracle Cloud Elevate Program: A series of enablement sessions helped build employees' skills in the latest Oracle Cloud technologies: SaaS, PaaS, and IaaS. A total of 770 employees attended, and 150 were certified.

DXC's holistic leadership development framework helps leaders align with DXC business goals and build the skills to execute strategy and demonstrate leadership behaviors. The following programs are active in multiple regions across DXC.

- **IGNITE@DXC:** Launched to provide DXC managers with the tools to build their managerial capabilities and DXC's people-first culture, this program has been completed by 9,000+ participants in India, the Philippines, Vietnam, Europe, and North America.
- Unleash@DXC: This transformational leadership program enables DXC India senior leaders' growth
  in terms of driving performance, aligning short-term actions with long-term direction, and shaping the
  organizational culture for success. Through November 2024, 75+ senior leaders completed the
  program.

#### **Examples of awards received by DXC Learning and Development:**

#### Gold-level awards from Brandon Hall Group:

- Future of Work (APJ-MEA): Best Program for Upskilling Employees Category DXC Career Navigator — Digital Skills Platform
- Leadership Development (Global): Best Senior Manager Development Program Category Projects Achieving Value & Excellence (PAVE)
- Leadership Development (Global): Best Unique or Innovative Leadership Program Category IGNITE@DXC
- Learning and Development (Global): Best Learning Program Supporting a Change Transformation Business Strategy Category ConsultEdge: "Empowering Consulting Excellence"
- Learning and Development (Global): Best Learning Program Supporting a Change Transformation Business Strategy Category — Enterprise Architect for an Agile Business
- Learning and Development (Global): Best Results of a Learning Program Category BRIDGE@DXC: Enhancing Customer Impact

## Disclosure 404-3: Percentage of Employees Receiving Regular Performance and Career Development Reviews

a. Percentage of total employees by gender and by employee category who received a regular performance and career development review during the reporting period:

DXC's FY24 year-end review process achieved a completion rate of 99%.



Employee Type	Male	Female	Prefer Not to Answer	Successfully Completed Total
Regular	67,361	38,522	223	106,106*
Total	99%	99%	99%	99%

<sup>\*</sup>Number as of December 31, 2024, not included are Luxoft and employees in countries with conflicting agreements

DXC's Performance Development Framework incorporates a range of processes and actions that enable our employees to deliver excellence while contributing to the organization's success. Our performance development philosophy:

- Focuses on developing performance, along with reviewing performance
- Encourages frequent and effective performance and career conversations
- Enhances employee impact on business performance

The performance development process includes goal setting, performance development enablers (checkin conversations, coaching, and continuous feedback from customers and colleagues), a mid-year review, and a year-end review.

## **GRI 405: Diversity and Equal Opportunity**

#### Management Approach Disclosures for Diversity and Equal Opportunity

DXC is strongly committed to equal employment opportunity and affirmative action (EEO/AA). We consistently promote this commitment in our overall efforts to support diversity and an inclusive company culture. The more we value our individual differences and nurture our unique strengths, the more we can inspire, innovate, and accomplish as a team. As an integral part of our business strategy, this commitment to EEO/AA and diversity promotes an open environment of tolerance, understanding, and respect. It also serves as both a catalyst and an essential advantage in the success of our global business.

The DXC Global Diversity and Non-Discrimination Policy guides our engagement in management practices, including, e.g., recruitment, selection, job assignment, subcontracting/procurement of goods and services, transfer, promotion/demotion, layoff, return from layoff, discipline — including termination, training, education, tuition, social and recreational programs, compensation, and benefits — without unlawful discrimination on the basis of and without regard to race, ethnicity, color, religion, sex (including pregnancy, childbirth, and related medical conditions), national origin, disability (physical or mental), age, protected veteran status or military service or affiliation, marital status, sexual orientation, gender identity and expression, protected genetic information, political affiliation, or any other basis prohibited by law.

A key component of the company's commitment to equal employment opportunity is zero tolerance for workplace abusive conduct and harassment. Such harassment, whether committed by company personnel or by customers, vendors, or other individuals doing business with DXC Technology, is not tolerated.

As allowable by law, the policy applies worldwide to all directors, officers, executives, employees, and representatives of DXC, its wholly owned subsidiaries, and their affiliates. If any specific provision in this policy directly conflicts with applicable local law, local labor agreement, local collective bargaining agreement, or a local policy rolled out by DXC, the applicable local law, agreement, or policy, as applicable, will supersede that section or provision, and the remainder of this policy will remain in effect.

DXC promotes an organizational culture that encourages ethical conduct and a commitment to compliance with our Code of Conduct, internal company policies, and the law. All employees shall observe and preserve our core corporate values, make decisions and choices that are consistent with these values, and comply with applicable internal policies and the law in the jurisdictions where DXC does or seeks to do business. To learn more about our commitment to a diverse and inclusive corporate



#### Disclosure 405-1: Diversity of Governance Bodies and Employees

a. Percentage of individuals within the organization's governance bodies in each of the following diversity categories (gender, age group, other indicators of diversity):

#### **FY24 DXC Board Diversity**

#### **DXC Board by Gender**

Gender	Sum of Count	%
Female	3	30
Male	7	70
Grand Total	10	100

#### **DXC Board by Age**

Age Group (Years)	Sum of Count	%
41 – 50	1	10
51 – 60	4	40
61 – 64	4	40
65 and above	1	10
Grand Total	10	100

#### **DXC Board by Minority**

Sum of Count
3
1
5
2
10*

<sup>\*</sup> One board member falls into both the African American, and Asian categories.



## b. Percentage of employees per employee category in each of the following diversity categories:

#### Gender:

Gender	%
Male	65.0
Female	34.8
Not declared	0.2
Grand Total	100

#### Age Group: Under 30 Years Old, 31 - 50 Years Old, 51 Years and Over

Age Group (Years)	%
18 – 24	10.5%
25 <b>-</b> 34	32.5%
35 – 44	28.3%
45 – 54	17.2%
55+	11.5%
Undisclosed	0.0%
Grand Total	100%

c. Other indicators of diversity where relevant (such as minority or vulnerable groups): DXC does not disclose this data.

Disclosure 405-2: Ratio of Basic Salary and Remuneration of Women to Men DXC does not disclose the salary ratio of women to men.

### **GRI 406: Non-Discrimination**

**Management Approach Disclosures for Non-Discrimination** 

Same as for GRI 405.

#### Disclosure 406-1: Incidents of Discrimination and Corrective Actions Taken

DXC does not disclose incidents of discrimination and corrective actions taken.

### **GRI 409: Forced or Compulsory Labor**

#### **Management Approach Disclosures for Forced or Compulsory Labor**

DXC is a UN Global Compact signatory and has global policies and procedures in place to prevent human rights violations in our operations, such as child labor or forced labor, and to explicitly address modern slavery and human trafficking risks. These policies apply to all geographies in which we operate. Our local entities are empowered to respond to local risks and issues to further mitigate concerns or risks.



DXC's policies related to preventing modern slavery include the DXC Code of Conduct and accompanying employee training material, the DXC Human Rights Statement, the DXC Modern Slavery Statement, and the DXC Responsible Supply Chain Principles (with accompanying guidance and employee training material). The Code of Conduct, Human Rights Statement, Modern Slavery Statement, and Responsible Supply Chain Principles are published on our website, <a href="DXC.com">DXC.com</a>, and these policies are also made available to our directors, officers, managers, employees, and representatives through awareness and training programs.

## Disclosure 409-1: Operations and Suppliers at Significant Risk for Incidents of Forced or Compulsory Labor

DXC's activities are largely considered low risk for modern slavery and labor violations. DXC does not manufacture any technological hardware, and our core activities are typically performed by a highly skilled and specialized workforce. This applies also to the types of activities that DXC procures, which are predominantly in software and services.

As part of our due diligence, we review human rights and modern slavery risks within our operations and within our supply chain annually. In FY24, 218 suppliers were identified for modern slavery due diligence. Key findings include:

- 70%-plus of our suppliers in scope for modern slavery due diligence have a public policy covering human rights and/or modern slavery.
- 80% of our largest suppliers and higher risk suppliers proactively address risks of modern slavery in their operations and supply chains.
- 96% of DXC's IT equipment suppliers with annual spend over \$1 million (DXC suppliers with the
  highest risk for modern slavery) proactively address risks of modern slavery in their operations and
  supply chains.

In FY24 we found no issues of modern slavery within our supply chain.

### **GRI 413: Local Communities**

#### **Management Approach Disclosures for Local Communities**

As a UN Global Compact signatory, we believe in stewardship and building a sustainable company that supports our communities. We are engaged in numerous community outreach efforts and projects to improve the lives of our colleagues and the communities in which we live and work. Our active involvement in our communities yields efficient and beneficial outcomes for society — including innovative technology solutions, youth and adult educational initiatives, and volunteerism across our global workforce.

## Disclosure 413-1: Operations with Local Community Engagement, Impact Assessments, and Development Programs

DXC uses the power of technology to build better futures for our customers, colleagues, environment, and communities. We are committed to living our values: Deliver, Do the right thing, Care, Collaborate, and Community. DXC contributes to charities, nonprofits, and social enterprises and is committed to fostering a diverse and inclusive culture.

We are proud of our extensive and active Employee Resource Groups. More than 20 affinity groups with regional chapters in the Americas, Asia Pacific, and Europe create and nurture a safe and welcoming workplace environment where all employees are valued. These groups bring our values to life and help make DXC an employer of choice.

In partnership with 10 NGOs in India, DXC has implemented 13 social responsibility projects that have positively impacted the lives of approximately 440,000 individuals nationwide. The Skill Development and Employability Program, which serves 33,880 individuals, provides training in the skills critical for today's employment market. The 2023 – 2024 Scholarship Program, which nurtures 310 students in science, technology, engineering, and mathematics (STEM) fields and in sports, both promotes academic and



athletic success and develops future leaders in these disciplines. Initiatives such as the digitalization of 50 government schools, the school transformation program, inclusive education, and career assistance have helped improve the quality of education in government schools. Digital resource centers serve as important hubs for digital literacy and information access. Initiatives in India such as Skill Development of Persons with Disabilities and the Underserved, the Women Entrepreneurship Development Program, residential advanced IT training for girls, and the Assistive Technology Program demonstrate a commitment to inclusivity and empowerment while addressing the unique needs of diverse communities. These collaborative efforts are critical to creating a society in which everyone, regardless of background, has the opportunity to succeed and contribute effectively within their communities and beyond.

2024 marks 10 years since the establishment in Australia of our award-winning DXC Dandelion Program, which has enabled sustainable, long-term careers in information and communications technology for more than 350 neurodivergent people globally. We recruit neurodivergent people for the DXC Dandelion Program and provide them with comprehensive career guidance, onsite support, and training, matching their skills to the needs of DXC's customer organizations. The program helps neurodivergent people build careers while helping our customers meet their IT needs with the support of highly skilled and dedicated team members. The DXC Dandelion Program has grown to more than 26 teams of neurodivergent colleagues in Australia, the UK, Poland, Bulgaria, and the Philippines. In 2024, we launched the program in Italy, and it is under development in the Middle East and the United States.

Our UK Social Value Practice strives to contribute to a better world through impact-driven programs — for people, for our planet, and to protect our supply chains. In FY24, we employed 25 DXC Dandelion Program employees in the UK. We impacted the lives of more than 100 young people via the Digital Futures Academy, a 4-year education program for secondary-school students in the Greater Manchester and Erskine areas. We also employed 222 apprentices, providing young people and current DXC employees with the opportunity to train and upskill. In FY24, we joined the Green Software Foundation, an NGO that provides technology companies with standards and tools for building and delivering more energy-efficient, lower-carbon technology solutions. We support green software by treating it as a core design principle, training our people to be certified Green Software Practitioners, and engaging with the Green Software Foundation's working groups and projects. Finally, 15% of our UK suppliers in FY24 were diverse suppliers.

DXC's First Nations Program envisions an Australia in which First Nations peoples and their communities achieve self-determination and proportional representation in all areas of society; where we practice truth-telling of our history; and where we recognize and appreciate the unique knowledge and views of Australia's First Nations peoples.

The vision of the DXC Asia Pacific Digital Futures Program is a world where all people have access to technology systems, education, and training, so they can participate in the economy and practice self-determination for the sustainability of their cultures, environment, and communities. Working with our customers, our partners, and communities, our mission is to drive technology availability and literacy across the Asia Pacific region, to improve education, employment, and self-determination for underprivileged people, to close the digital divide in a tangible and measurable way, and to support sustainability for all communities.

DXC is proud to be recognized as a leading company for corporate citizenship. Sustainalytics classifies DXC as an ESG Industry Top Rated company, and MSCI rates DXC's ESG performance as AA (on a scale of AAA – CCC). We achieved a top score of 100 for a 6th consecutive year in the 2024 Disability Equality Index and were named the 2024 Autism Inclusion Company of the Year by Disability:IN and SAP. Comparably named DXC a "Best Company for Global Culture in 2024." We are rated A- by CDP and in 2024 were included on Newsweek magazine's list of America's Most Responsible Companies for environmental, social, and corporate governance performance.

## Disclosure 413-2: Operations with Significant Actual and Potential Negative Impacts on Local Communities

We believe that our operations' significant potential negative impact on local communities is zero.



## **GRI 414: Supplier Social Assessment**

#### **Management Approach Disclosures for Supplier Social Assessment**

Our suppliers are an integral part of our sustainability strategy. In our procurement activities, we take into careful consideration a set of economic, process-driven, and technical criteria as well as essential social, environmental, and ethical responsibilities such as human rights, labor conditions, anti-corruption concerns, and environmental protection. This is why we have established the DXC Responsible Supply Chain Principles. These principles speak to the commitments we make to our customers and our relationships built on trust and personal responsibility. They establish the standards required to conduct business with DXC. DXC's Human Rights Statement was developed following the tenets of the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Universal Declaration of Human Rights. We expect our suppliers to introduce suitable processes within their organizations that support compliance with applicable statutes and drive continuous improvements regarding the requirements laid out in the DXC Responsible Supply Chain Principles. Our goal is to work with our suppliers to ensure full compliance with these principles, as they in turn apply them to their own suppliers with whom they work to deliver goods and services for DXC. We routinely assess the performance of our key suppliers and evaluate compliance with the principles as part of DXC's ongoing Responsible Supply Chain Program. Where law permits, suppliers must participate in annual surveys and information gathering. Suppliers are expected to follow programs of improvement, including remediation if required, and must accept, if necessary, the possibility of contract termination.

Our Responsible Supply Chain Principles establish a set of clear, detailed standards across six main categories for doing business with DXC:

- Respect for the basic human rights of employees
- Enforcing labor standards and prohibiting child labor
- Prohibition of corruption and bribery
- Environmental protection
- Inclusion and belonging
- Systems and processes to ensure success in these areas

DXC also expects its suppliers to adhere to relevant national, regional, and international laws and standards. These cover human rights, health and safety, fair labor practices, conflict minerals, the environment, bribery and corruption, and equality. We consider adherence to our Responsible Supply Chain Principles when we select suppliers, and we reserve the right to monitor supplier processes and procedures against these principles as part of our ongoing Responsible Supply Chain Program.

DXC conducts an annual supplier survey of its high-risk suppliers. The survey helps us assess potential risks or instances of modern slavery or environmental issues in our supply chain. In this way, we can evaluate suppliers' compliance with our principles. When we identify gaps in a supplier's compliance, we work with that supplier to fill these gaps.

We are committed to minimizing the risk of all forms of forced labor and human trafficking within our business or supply chain. Our Human Rights Statement sets out the steps we have taken to combat modern slavery and human trafficking at DXC and in our supplier organizations. Through our risk-based approach to eradicating these human rights abuses from our supply chain, we have incorporated specific questions on modern slavery and human trafficking into our screening survey for our largest direct suppliers by spend. When hiring new DXC employees and individual contractors, we check that they are legally eligible to work, ensure that they undertake and pass background checks, and pass our security clearance. We are positive that these multiple checks allow us to identify victims of trafficking or slavery.

For more details, please see the Responsible Supply Chain page on our website.

#### Disclosure 414-1: New Suppliers That Were Screened Using Social Criteria

DXC conducts supply chain due diligence based on the materiality and risk profile of the supplier. DXC monitors our highest risk and largest suppliers for adherence to global human rights and modern slavery



requirements. In FY24, approximately 220 suppliers were selected for due diligence activities. No issues of modern slavery or human rights violations were found during our due diligence review.

#### Disclosure 414-2: Negative Social Impacts in the Supply Chain and Actions Taken

Through our FY24 due diligence process, we identified no material supplier performance issues related to environmental impacts within our supply chain.

### **GRI 418: Customer Privacy**

#### **Management Approach Disclosures for Customer Privacy**

#### **Privacy Imperative**

Global privacy and information management represents an important area for multinational organizations that collect, process, and transfer information, such as confidential employee, customer, and business partner data, including personal data as defined in applicable data protection laws and regulations. The regulatory climate for data privacy and protection continues to grow in scope and complexity, as do the financial, legal, and reputational costs of a potential data breach. There are no boundaries because customer privacy affects DXC inside and out, everywhere in the world. Legislation with an extraterritorial reach and customer contracts with a global scope require us to apply a holistic approach to manage the privacy of customer data that is in our custody in every jurisdiction. We are engaged in all aspects of customer data processing, whether data is stored within customers' networks, hosted in DXC data centers, handled by DXC service personnel, or processed on behalf of DXC by our subcontractors, group companies, and other strategic partners.

#### **Managing Privacy**

DXC's Global Data Protection program aims to foster the protection of confidential information uniformly and cohesively as well as compliance with international regulations on privacy and data protection. Implementing and maintaining this program is a strategic part of achieving consistent data protection across our company worldwide via standardized policies and privacy-aware employees. We designed our data protection and information security policies and procedures to mitigate and minimize vulnerabilities, including loss, misuse, unauthorized access, and unauthorized disclosure of confidential and personal information. Comprehensive and strategic mitigation of the risks associated with a data breach is a top priority for DXC. Our approach includes an in-place crisis management plan to prepare for potential incidents through a response team triaging adequately defined and comprehensive investigation and notification protocols to ensure a coordinated, timely data breach response. This response includes management escalation and reporting actions as well as management of remediation efforts. If a breach occurs, we will duly report the incident to the relevant customers and authorities in accordance with contractual and legal requirements. To ensure that company, customer, and personal information is accessed only to meet business requirements, we train our employees on data protection and security safeguards.

#### **Policies and Commitments**

We have implemented and maintain a company-internal privacy policy as well as a publicly accessible online enterprise privacy statement to reflect the value we place on earning and maintaining the trust of our employees, customers, business partners, and others whose personal data or other confidential information is shared with us and to ensure our commitment and dedication to their privacy. We are committed to the lawful treatment and confidential handling of sensitive information, including personal data. We have therefore adopted a set of global information management policies, including privacy and data protection, security, records and data management, sensitivity labeling, and other relevant policies governing the collection, use, disclosure, transfer, retention, and deletion of information. We confirm that we will process personal data to which we have access in connection with our performance under any service agreement: (1) only on behalf of and for the benefit of the customer; (2) in accordance with the service agreement and contractor's prior written instructions, if any; and (3) as otherwise required or permitted by applicable data protection laws and regulations. We confirm that we will not process any personal data for any other purpose, absent specific written authorization from the contractor.



#### **Security and Confidentiality**

We have implemented a comprehensive suite of technical and organizational security measures and controls enabling us to comply with the requirements of applicable data protection laws regarding the secure and lawful collection, storage, use, transfer, and processing of personal data. These measures include appropriate data processing and data transfer agreements aimed to provide an adequate level of privacy protection by and between DXC service partners. Across our global data security program, we use cybersecurity expertise to deter and mitigate threats, and we maintain ISO 27001 Information Security Management and ISO 27701 Privacy Information Management certifications at key data centers and delivery centers. To adequately address related compliance obligations and requirements, DXC has established a global data protection governance structure supported by an effective data privacy program. We will not disclose personal data to government and law enforcement unless required by law to do so. Where reasonably possible, we will attempt to redirect the requester directly to the customer or promptly notify the contractor and provide a copy of the access request, unless legally prohibited from doing so.

#### **Ongoing Monitoring**

We are committed to implementing "privacy by design" principles, including a privacy-management life cycle across all business areas. As part of this life cycle, we maintain ongoing monitoring of our privacy obligations, policies, and controls, including data protection impact assessments and privacy reviews of internal systems and processes used in the handling of personal data. External business partners, service providers, vendors, and suppliers are obliged to comply with our policies and applicable laws and are subject to due diligence and compliance reviews accordingly. Subject to contractual agreements, customers shall have the right to inspect, with reasonable notice and during normal business hours, our business processes and practices involving the processing of personal data in relation to the services being provided to the customer. Respectively, DXC agrees to provide the customer with the reasonable documentation and information required for the customer to conduct a due diligence audit. We also agree to correct any security deficiencies or vulnerabilities caused by us or our subcontractors, within a time frame mutually agreed to by the parties involved. DXC's security program is a key priority for the board of directors and our executive team. Accordingly, members of the board of directors receive information security updates at least quarterly, either directly from the COO or from the chief information security officer (CISO). Updates reflect security performance, third-party assessments, and ongoing continuous improvement efforts.

#### **Goals and Targets**

DXC strives for best-in-class privacy and data protection and privacy management, which requires a sound data privacy governance structure and an effective data protection compliance program to ensure that we meet our contractual obligations and evolving and increasingly complex regulatory standards. Newer technologies, such as generative artificial intelligence (gen AI) and large language models (LLMs), create business and operational efficiencies but also pose risks to how personal data is processed. DXC is pilot testing several of these technologies while guarding against premature adoption.

#### Resources

With a global lead data protection officer based in the EU and a network of privacy professionals at the corporate and regional levels, DXC Global Data Protection is a qualified strategic compliance function that operates under the authority of our global DXC Integrity Office. Global Data Protection is responsible and accountable for advising our businesses on best practices in privacy and data protection compliance; for developing policies, procedures, training, and risk assessment; and for monitoring programs that enable us to provide adequate levels of personal data protection for our customers, colleagues, and other relevant individuals in all geographies and jurisdictions around the world.

## Disclosure 418-1: Substantiated Complaints Concerning Breaches of Customer Privacy and Losses of Customer Data

Any specific communication about complaints or breaches is deemed "customer confidential" information and cannot be publicly disclosed.



End of Report.



# **Cautionary Statement Regarding Forward-Looking Statements**

All statements in this document that do not directly and exclusively relate to historical facts constitute "forward-looking statements." Forward-looking statements often include words such as "anticipates," "believes," "estimates," "expects," "forecast," "goal," "intends," "objective," "plans," "projects," "strategy," "target," and "will" and words and terms of similar substance. These statements represent current expectations and beliefs, and no assurance can be given that any result, goal or plan set forth in any forward-looking statement can or will be achieved. Such statements are subject to numerous assumptions, risks, uncertainties and other factors that could cause actual results to differ materially from those described in such statements, many of which are outside of our control. For a written description of these factors, see the section titled "Risk Factors" in DXC's Annual Report on Form 10-K for the fiscal year ended March 31, 2024, and any updating information in subsequent SEC filings. Readers are cautioned not to place undue reliance on such statements which speak only as of the date they are made. We do not undertake any obligation to update or release any revisions to any forward-looking statement or to report any events or circumstances after the date of this document or to reflect the occurrence of unanticipated events, except as required by law.

The information we provide herein and on our website, including in our voluntary ESG-related reporting, is not necessarily "material" under the U.S. federal securities laws for Securities and Exchange Commission (the "SEC") reporting purposes, even if we use the term "material" or "materiality" herein, on our website and in our external ESG disclosures, or in other materials that we may release from time to time in connection with our ESG efforts, goals and initiatives. Any such ESG-related information, whether included herein, on our website or otherwise, may be informed by definitions of materiality other than the definition under the U.S. federal securities laws and may be informed by various ESG standards and frameworks and the interests of various stakeholders. Given the inherent uncertainty of such information, estimates, assumptions and timelines contained in our ESG-related disclosures, we may not be able to anticipate in advance whether or the degree to which such matters are "material" under the U.S. federal securities laws or whether we will or will not be able to meet our plans, targets or goals.

Furthermore, much of this information is subject to assumptions, estimates, or third-party information that is still evolving and subject to change. Our disclosures may change due to revisions in framework requirements, availability or quality of information, changes in our business or applicable government policies, changing stakeholder focus, or other factors, some of which may be beyond our control. Given the uncertainties, estimates, and assumptions involved, the materiality of some of this information is inherently difficult to assess far in advance. We may also rely on third-party information, standards, and certifications, which may change over time as methodologies and data availability and quality continue to evolve. These factors, as well as any inaccuracies or methodological concerns with the third-party data and frameworks we use, including in our own estimates or assumptions in response to such frameworks, may cause results to differ materially, and adversely, from estimates and beliefs made by us or third parties, including regarding our ability to achieve our goals. While we are not aware of any material flaws with the third-party information we have used, except to the extent disclosed, we have not undertaken to independently verify this information or the assumptions or other methodological aspects underlying such information.





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#### **About DXC Technology**

DXC Technology (NYSE: DXC) helps global companies run their mission-critical systems and operations while modernizing IT, optimizing data architectures, and ensuring security and scalability across public, private and hybrid clouds. The world's largest companies and public sector organizations trust DXC to deploy services to drive new levels of performance, competitiveness, and customer experience across their IT estates. Learn more about how we deliver excellence for our customers and colleagues at <a href="DXC.com">DXC.com</a>.

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