

MINDTREE’S ANTI-SLAVERY AND ANTI-HUMAN TRAFFICKING STATEMENT

This Annual statement is published on behalf of Mindtree Limited (“Mindtree”) pursuant to Section 13 and prepared in accordance with section 16 (Mandatory criteria for modern slavery statements) of the Modern Slavery Act 2018 in respect of the **Financial Year 2019-2020**.

INTRODUCTION

Mindtree values comprise of principles of honesty, integrity, fairness and transparency. Our sustainability framework is based on diverse workforce, inclusive workspace, applicable regulations, employee engagement, robust policies, and strict adherence to code of conduct, risk management framework, reporting and disclosure. Our governance philosophy requires each of us to act in the spirit of law and not just letter of law, do what is right and not what is convenient, provide complete transparency and follow openness in our communication with our stakeholders.

1. OUR ORGANISATION STRUCTURE, OPERATIONS AND SUPPLY CHAIN

(a) About Mindtree: Structure and Operations

Mindtree [NSE: MINDTREE] is a global technology consulting and services company, helping enterprises marry scale with agility to achieve competitive advantage. “Born digital,” in 1999 and now a Larsen & Toubro Group Company, Mindtree applies its deep domain knowledge to 280+ enterprise client engagements to break down silos, make sense of digital complexity and bring new initiatives to market faster. We enable IT to move at the speed of business, leveraging emerging technologies and the efficiencies of continuous delivery to spur business innovation. Operating in 17 countries and over 40 offices across the world, we’re consistently regarded as one of the best places to work, embodied every day by our winning culture made up of over 21,800 entrepreneurial, collaborative and dedicated employees.

Mindtree is incorporated in India and has headquarters in Bangalore, India and listed in National and Bombay Stock exchanges in India with key operational hubs in Australia, India, United Kingdom, Singapore and United States of America.

In Australia, our company operates as a branch of a foreign subsidiary and has an **Australian Business Number 24 125 171 155**. Our company operates a similar branch model in other key operational hubs, other than China where it has a subsidiary, Mindtree Software (Shanghai) Co. Ltd which is an ‘entity’ that Mindtree owns/controls, for the purposes of the Modern Slavery Act 2018.

Larsen & Toubro Limited (L&T) is Mindtree's Holding Company and majority shareholder. L&T is an Engineering & Construction company ranked 6th among the top 10 most attractive employer brands in India in 2019 (Randstad Employer Brand Research).

b) Company Overview: Technology Solutions to help businesses and societies flourish

Mindtree delivers digital transformation and technology services from ideation to execution, enabling Global 2000 clients to outperform the competition. Mindtree provides Digital, IOT, ERP, Engineering, Independent Testing, Infrastructure management, Data warehouse and analytics and related services to Industry groups like Banking Financial services and Insurance, Retail, Consumer packed goods and Manufacturing, Communication, Media and Technology, and Travel, Transportation, Logistics and Hospitality. "Born digital," Mindtree takes an agile, collaborative approach to creating customized solutions across the digital value chain. Our deep expertise in infrastructure and applications management turns Information Technology (IT) into a strategic asset. Collaborative Spirit, Expert Thinking and Unrelenting Dedication are our values and the mission for FY 2019-20 at Mindtree is "Technology Solutions to help businesses and societies flourish." Mindtree recently achieved a milestone of \$1 billion revenue with a headcount of over 20,000 in FY 19-20 which also happens to be our 20th year since inception.

c) Born with Integrity

Mindtree is committed to the highest standards of integrity and professionalism in everything we do. Mindtree has zero tolerance to Slavery and Human Trafficking. Mindtree does not tolerate it either within our business itself or within our supply chain. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

d) Corporate Governance Philosophy

We strongly believe in integrity and transparency as key governance pillars. At Mindtree, Corporate Governance is not a mere legal obligation as the Company provides utmost importance to best governance practices designed to act in the best interests of its stakeholders. The Fundamentals of the governance at Mindtree includes a) Transparency, Accountability, Integrity and Independence, b) Act in the Spirit of Law and not just the Letter of Law, c) Do what is right and not what is convenient, and d) Provide complete transparency on our operations and follow openness in our communication to all our stakeholders.

e) Supply Chain Overview

Mindtree is committed to the highest standards of integrity, professionalism and compliance with laws and expects the same from all its suppliers, contractors, vendors and other business partners.

Mindtree's supply chain is integrally linked to its successful growth and works end-to-end to bring specific industry experience as well as a cross-industry perspective to help seed innovation. We have automated ERP System with vendor masters. We have vendor onboarding process which is verified before adding in vendor master. As the first step in this program, it is mandatory for all to accept our code of conduct principles.

Our Supply chain process is robust. While onboarding suppliers it is ensured that the suppliers familiarize themselves with policies and processes which are followed at Mindtree. The slavery risk is integrated as part of vendor onboarding process. We have a policy to ensure that we do not engage Child labor. We ensure that the suppliers of Mindtree adhere at all times, to all policies including but not limited to the Non-Discrimination policy, Whistle Blower Policy, Supplier code of conduct, Anti-Slavery, Anti-Human Trafficking, Anti-Bribery and Anti-Corruption, Code of Conduct etc. Mindtree has zero tolerance on compliance matters and Suppliers are required to comply with all applicable laws and produce statutory records during Compliance Audits.

Suppliers at Mindtree, have been broadly segregated into 4 major segments based on the Goods & Services procured:

- a) IT Related – Hardware, Software & network;
- b) Admin Related - Facility, Security, Health, and Safety etc.;
- c) Talent (People) Related- Manpower, Background verifications service providers etc.; and
- d) Corporate Activity Related- Accounting, Consulting, Training, Immigrations, etc.

Active vendors are spread across the globe where Mindtree procures services from multiple categories of suppliers from various countries/regions like Cloud Subscription Services, Immigration services, Laptop & their peripherals, Payroll Services, Marketing related services like advertisement, printing, graphical & design services etc. The majority of Mindtree's global suppliers are engaged in supplying hardware, software, cloud services, networking equipment's and talent management, office space lease & maintenance expenses and employee travel related expenses. Mindtree's current global suppliers are located in over 30 major countries and sub regions of this countries like Australia, Austria, Belgium, Bulgaria, Bahrain, Canada, Switzerland, China, Germany, Denmark, Spain, Finland, France, United Kingdom, Hong Kong, Ireland, Israel, India, Japan, South Korea, Luxembourg, Mexico, Malaysia, Netherlands, Norway, Philippines, Poland, Saudi Arabia, Sweden, Singapore, UAE & USA.

f) Risk Evaluation Process

We would be considering Modern Slavery risks that may be present anywhere in the global and domestic operations and supply chains of the reporting entity and subsidiaries. This would be conducted by an analysis into the: -

- a. *Broad operations and overall supply chain structure of the entity.*

Mindtree operates in the IT/ITES sector that employs highly trained technical staff to efficiently cater to the customers deliverables. The type of suppliers and their locations are mentioned in the above paragraph. Such vendors are located in a number of countries

that are included in the Global Slavery Index 2018.

- b. *Analyze which of the sectors, types of products and services, countries and entities identified may involve high Modern Slavery risks.*
- c. *Identify the parts of supply chains that you do not have visibility over and consider if they may involve modern slavery risks.*

Adherence to all compliance related requirements and to perform their task, is mandatory and non-negotiable. All vendors who are not active are blocked as per established system. There is visibility to all the active vendors in the system.

All Commercial Agreement and Purchase Order terms address the Anti-Slavery compliance as part of Mindtree's supplier Code of Conduct.

As per Mindtree's Supplier Risk Framework, assessment is being done independently by enterprise risk team and tagged for Low/Medium/High Risk and monitoring the mitigation.

g) Vendors at Risk – Geographic related

Mindtree understands that certain geographical locations and industries present greater risks of modern slavery. These risks include the use of child labour and other forced, bonded or indentured labour.

Mapping for the Mindtree locational presence to the Global Slavery index 2018 has been completed. Assessments are regularly carried out to ensure that none of the identified vendors are from manual labor-intensive sectors.

h) Current Controls

The current procurement related process is **very transparent and includes best practices** in relation to awarding of contracts with multiple vendors involved in the process such as RFI & RFP, bidding, etc.

Mindtree ensures minimum wage rates are paid contractually to the suppliers. Given all the above risk observations and the current controls and the controls that have been proposed to strengthen the process, the current risk level for Modern Slavery Risk would be Low.

Adequate due-diligence procedures are implemented before onboarding new Suppliers. Suppliers are also contractually required to comply with Mindtree policies, applicable laws and regulations. For example:

- (a) We have a detailed Onboarding process for our Suppliers. Our suppliers are required to sign Master services agreement (MSA) and while onboarding new suppliers we obtain applicable Registration / Licenses. We issue Purchase Orders to our suppliers which have clauses which prevent the use of Child Labour, Forced, bonded or indentured labour or Involuntary Prison

Labour. We effectively oversee our suppliers to ensure they comply with applicable laws.

- (b) All suppliers that are on-boarded are assigned to internal teams who monitor and assess their performance periodically.
- (c) As per Mindtree's Supplier Risk Framework, an assessment of each supplier is undertaken by Mindtree's enterprise risk team and each supplier is tagged as Low/Medium/High risk.

Our Corporate Anti Bullying Policy proactively prevents workplace bullying. Our employees and sub-contractors are encouraged to promptly report the alleged bullying behaviors on internal portal.

In order to create awareness and promote best practices, we have mandatory e-Learning courses not limited to Integrity, Prevention of Sexual Harassment, to bring about a common understanding across all employees including sub-contracted employees.

Our employees and sub-contracted employees have access to the Whistleblower Complaint mechanism, where they can lodge complaints on various concerns and not limited to use of Child Labor, Slavery, forced, bonded or indentured labor or involuntary prison labor, Human trafficking etc., which helps us to proactively identify any cases relating to coercion, threats or deception.

2. MITIGATION OF MODERN SLAVERY RISK

Mindtree is committed to ensuring that there is no Modern Slavery or Human Trafficking in any part of our business including our supply chains. Mindtree has formulated various policies and practices such as Whistleblower Policy, Integrity Policy, Code of Conduct Policy, Non-Discrimination Policy, which focus on anti-Slavery and anti-Human Trafficking and is part of a larger effort to supply chain transparency and accountability and respect for human rights. Committees to address and resolve the issues are also constituted thereby mitigating the risk of Modern Slavery. The internal policies are available on Mindtree intranet named "People Hub" and policies such as Whistleblower Policy are available on Mindtree's website www.mindtree.com.

We will undertake the below proposed controls for mitigating Modern Slavery Risk:

- (a) We will ask our suppliers to provide a self-declaration that there are no slavery related concerns in their organization and also in their engagement with us. We will also create a Modern Slavery Act Australia - awareness training for all our employees to create awareness and common understanding to ensure awareness. Suppliers shall be assessed for compliance and appropriate training shall be provided to personnel engaging with suppliers. We will include our Modern Slavery statement as a part of our policy section in our Intranet so that it is easily accessible to all employees and subcontract employees. Mindtree has a supplier risk rating framework in place, and is in the process of creating a Risk Assessment Framework to strengthen the Supply chain process, and to carry out periodical risk assessments to identify modern slavery risks periodically and to address any remediation processes.

- (b) We will also design a survey for our employees and sub-contracted employees to proactively obtain their feedback on various concerns associated with and not limited to slavery, coercion, and/or debt bondage.
- (c) We will create an oversight mechanism in our talent acquisition process to proactively ensure that we identify slavery related concerns. The recruited employees will be asked to confirm whether they have paid any recruitment fee to the supplier. Similarly, we will ask suppliers to give a declaration that they have not collected any fees from the candidates placed by the suppliers.
- (d) We will prepare a questionnaire to confirm our suppliers' awareness and compliance with the Modern Slavery Act 2018 of Australia.
- (e) We will include our Modern Slavery statement as a part of our policy section in our Supplier Portal so that it is easily accessible to all employees and subcontract employees.
- (f) We will ensure our compliance framework, including our policies, procedures, training modules, employee code of conduct and supplier code of conduct are aligned to the requirements of the Modern Slavery Act 2018 and also reviewed periodically for any changes and updates from time to time. Mindtree will also create a process for carrying out periodical reviews of its Modern slavery framework.
- (g) We will design employee mailers to create awareness of the Modern Slavery Act 2018.
- (h) We will review and amend our supplier contracts to align them with the requirements of Modern Slavery Act 2018, including by defining modern slavery violations as a material breach.
- (i) We will also include the review of our Supply chain for Modern Slavery Act as a part of our scope for Internal Audit.
- (j) We will include Modern Slavery as a Key performance Indicator (KPI) for our employees dealing with Supply chain.

3. DUE DILIGENCE AND REMEDIATION PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

- I.** As part of Mindtree's initiative to identify and mitigate risk –
 - a) Mindtree does periodic audits to ensure optimum controls in the work environment;
 - b) Mindtree is committed to working with its suppliers/vendors to eradicate modern slavery from its supply chain.

- II.** As part of Mindtree's initiative to remediate concerns-
 - a) We have in place, systems to encourage the reporting of concerns and the protection of Whistleblowers.
 - b) We have a supplier portal in place which will be extended to all geographies with additional functionalities by April 2022.
 - c) A Supplier Risk Assessment will be carried out as a part of supplier Onboarding and also periodic risk assessments will be carried out effectively.
 - d) Supplier and employee surveys will be put in place to proactively identify modern slavery related concerns.
 - e) Policies are in place to tackle any Modern slavery concerns which will be periodically reviewed and updated.
 - f) Identify suppliers with lower score on risk rating and initiate corrective measures.
 - g) Mindtree has also invested in an automated due diligence tool that will strengthen the process to identify any vendor with any type of compliance violations including Modern Slavery.
 - h) The Modern Slavery indicator will also be added to the existing Supplier Risk Framework for greater transparency and tracking.
 - i) We will create a framework for the tracking risk related to Modern Slavery and link the same with the vendor on-boarding process.
 - j) Include checklist from the Modern Slavery Act 2018 in the Vendor Audits for identified suppliers to check and reinforce Mindtree's commitment to this cause.
 - k) Introduce checks for the vendors policy on Anti-Slavery. If that's not present, then acceptance of Mindtree's Supplier Code of Conduct becomes mandatory.

4. RISK ASSESSMENT AND MANAGEMENT

Mindtree's Supplier Engagement Program integrates a program of continuing evaluation, capacity building and risk management with a focus on human rights and labour practices and regulatory compliance through ongoing periodic assessments done by both external consultants and review by the Internal Audit team. Mindtree expects that these steps will encourage responsible behavior from our partners.

5. RESPONSE TO COVID-19

Mindtree understands that the impact of COVID-19 must have increased the vulnerability of workers to modern slavery. Contract terminations, workforce reductions and sudden changes

to supply chain structures may affect some workers and increase their exposure to modern slavery. To combat the above, adoption of measures stated as under-

- a. Honoring the current contracts with Supplies/Vendors.
- b. Paying for completed work.
- c. Collaborating with suppliers, workers, management to identify best-practice approaches to protect and support vulnerable workers in global operations and supply chains.

6. ADHERENCE TO MINDTREE'S VALUES

Like any other critical topic like Anti-discrimination, Sexual Harassment or Conflict of Interest, Mindtree has zero tolerance towards Slavery and Human Trafficking. Mindtree expects all of those associated with Mindtree, including its employees, supply chain and contractors to adhere and strictly comply with Mindtree's values. Mindtree expects its stakeholders including its internal departments such as human resources and central procurement teams for ensuring compliance across the organization.

7. TRAINING AND AWARENESS

Mindtree offers training through forums and workshops to its employees who are responsible for Supply Chain Management and its suppliers on slavery, specifically regarding how to identify and respond to supply chain issues in accordance with the applicable laws. Mindtree also does various whistleblower awareness sessions to speak up and report any non-compliances.

8. MEASURING EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

Mindtree uses the following Key Performance Indicators (KPIs) to measure effectiveness on ensuring that Slavery and Human Trafficking do not take place in any part of our business or supply chains:

- a) Periodic in-house audits and also internal audit every quarter;
- b) Use of labor monitoring and payroll systems;
- c) Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, Mindtree's expectations; and
- d) Breach / Incident can be reported through common email ID like Whistleblower and Risk ID which is mentioned in all our PO terms.

9. REMEDIES FOR BREACH

In case of failure to comply with the policies, disciplinary action including dismissal or termination of the contract between the parties and/or further legal action is initiated against the offending party.

10. CONSULTATION

Mindtree has taken the steps to consult with the subsidiary, Mindtree Software (Shanghai) Co. Ltd, China in relation to matters set out in this statement.

11. FURTHER STEPS

Following a review of the effectiveness of the steps we have undertaken this year, we ensure that there is no slavery or human trafficking in our supply chains. We will continue to improve our processes and continue to encourage our principals and staff to report any concerns they have. Mindtree is committed to comply with the highest standards of ethical, moral, professional and legal conduct in Mindtree's business operations. To maintain these standards, the Whistleblower Policy provides a platform that encourages whistleblowers, having complaints of actual or suspected incidents of unethical practices, violation of applicable laws and regulations including categories relating to Supply Chain, Child Labour and Human Trafficking and the Integrity Code, to promptly come forward and express the same without any fear of retaliation. The Whistleblower policy aims to provide the appropriate platform and protection for whistleblowers to make Protected Disclosures of any actual or suspected incidents of unethical practices.

Declaration:

This Policy statement is made on and behalf of Mindtree Limited pursuant to section 13 of the Modern Slavery Act 2018, Australia and constitutes the slavery and human trafficking statement of Mindtree Limited for the **Financial Year 2019-2020**. The Statement has been approved by the Board of Mindtree Limited on Thursday, 24-December-2020.



DEBASHIS CHATTERJEE
CEO & MANAGING DIRECTOR
MINDTREE LIMITED
December 28, 2020.