

Australia Modern Slavery Statement: FY 2021-22

LTIMindtree's Australia Modern Slavery Statement

This annual statement is published on behalf of LTIMindtree Limited, a company incorporated under the laws of India, having its registered office situated at L&T House, Ballard Estate, Mumbai, India 400 001 (Company) pursuant to Section 13 and section 16 of the Modern Slavery Act 2018, Australia in respect of the Financial Year 2021-2022.

INTRODUCTION

Our values comprise principles of honesty, integrity, fairness, and transparency. Our sustainability framework is based on a diverse workforce, an inclusive workspace, employee engagement, robust policies, strict adherence to code of conduct, a strong risk management and compliance framework, reporting and disclosure. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour 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. LTIMindtree is committed to improving our practices to combat slavery and human trafficking in our business and supply chain to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. This statement highlights the key activities we have undertaken during this financial year to combat modern slavery in our organisation and supply chain.

1. OUR ORGANISATION STRUCTURE, OPERATIONS AND SUPPLY CHAIN

a. About Our Structure and Operations:

We are a global technology consulting and Information Technology (IT) services company that enables enterprises across industries to drive superior competitive advantage, customer experiences and business outcomes by harnessing digital and cloud technologies. As a socially and environmentally responsible business, we are focused on growth as well as sustainability in building long-term stakeholder value.

Our company is committed to the highest standards of integrity and professionalism in everything we do. We are consistently recognized among the best places to work. Larsen & Toubro Limited (L&T) is our holding company, majority shareholder and has been at the forefront for eight decades. Sustainability report of erstwhile Mindtree for financial year 2021-22 can be accessed for more details at our website <https://www.ltimindtree.com/social-responsibility/> and the annual report of erstwhile LTI can be accessed at <https://www.ltimindtree.com/wp-content/uploads/2022/06/LTI-Annual-Report-2021-22.pdf?pdf=download> and annual report of erstwhile Mindtree at <https://investorsarchive.ltimindtree.com/sites/default/files/2022-06/Annual-Report-FY-2021-22.pdf>.

Our company operates as a branch of a foreign company in Australia having registration number ABN 34 091 100 159 and a Subsidiary (Nielsen & Partner Pvt. Ltd.) having registration number ACN 624 699 627.

b. Company Overview:

LTIMindtree is a global technology consulting and digital solutions company that enables enterprises across industries to reimagine business models, accelerate innovation, and maximize growth by harnessing digital technologies. As a digital transformation partner to more than 700 clients, LTIMindtree brings extensive domain and technology expertise to help drive superior competitive differentiation, customer experiences, and business outcomes in a converging world. Powered by nearly 85,000 talented and entrepreneurial professionals across more than 33 countries, LTIMindtree — a Larsen & Toubro Group company — combines the industry-acclaimed strengths of erstwhile Larsen and Toubro Infotech and Mindtree in solving the most complex business challenges and delivering transformation at scale.

c. Born with Integrity:

We strongly believe that integrity and transparency are key governance pillars. Our company is committed to the highest standards of integrity, professionalism, and compliance with laws.

d. Corporate Governance Philosophy:

The corporate governance is not a mere legal obligation, and our governance practices are designed to act in the best interests of its stakeholders, by acting in the spirit of law and not just the letter of law, doing what is right and not what is convenient and providing complete transparency on our operations and following openness in our communication to all our stakeholders.

e. Supply Chain Overview:

Our supply chain is integrally linked to its successful growth, supported by vendor onboarding process, and supplier code of conduct principles. Our supplier code of conduct which can be accessed at <https://www.ltimindtree.com/investors/corporate-governance/>. The Modern Slavery risk is integrated as part of vendor onboarding process; our suppliers are required to comply with all applicable laws.

Our suppliers are spread in 33 countries across the globe where we procure services from multiple categories of suppliers. Most of our global suppliers are engaged in supplying hardware, software, cloud services, networking equipment's, talent management, office space lease and employee travel related services.

2. OUR POLICIES IN RELATION TO MODERN SLAVERY AND HUMAN TRAFFICKING

Our company is committed to ensure that there is no modern slavery or human trafficking in any part of our business including our supply chain. We have formulated various policies and practices given below which focuses on anti-slavery and anti-human trafficking, which also proactively prevents workplace bullying and is part of a larger effort to supply chain transparency and accountability and respect for human rights. Our human rights policy acknowledges the importance of human rights and strongly advocates upholding the fundamental principles of human rights. The current procurement related process is very transparent and includes best practices in relation to awarding of contracts.

We have systems to encourage the reporting of concerns and protection of whistle-blowers and all employees have access to Whistleblower complaint mechanism, where they can lodge complaints on various concerns not limited to use of child Labour, modern slavery, forced, bonded, or indentured labour or involuntary prison labour, human trafficking etc., in order to help us proactively identify such cases relating to coercion, threats, or deception. Our Whistleblower policy can be accessed at <https://www.ltimindtree.com/investors/corporate-governance/>

3. DUE DILIGENCE AND RISK MITIGATION PROCESSES FOR MODERN SLAVERY AND HUMAN TRAFFICKING

As mentioned above, we undertake due-diligence procedures before onboarding new suppliers. Our suppliers are contractually required to comply with our policies, as well as applicable laws and regulations. We have a detailed onboarding process for our suppliers, and we obtain applicable registration and license confirmations. Our procurement agreements and supplier purchase orders also include the Anti-Slavery and Human Trafficking clause. We have carried out risk assessments in approx. 50% of the operations and we are working towards covering the remaining areas in our annual risk assessment of our supply chain to assess, identify and address modern slavery related risks. We are also investigating establishing a risk framework for tracking risk related to Modern Slavery. We are in the process of obtaining declaration from our suppliers in Australia for compliance with Modern Slavery Act and are looking into how we can undertake controls like supplier awareness, oversight mechanism in our procurement and talent acquisition process for mitigating modern slavery risk.

Our compliance framework, including our policies, procedures, code of conduct training modules, employee code of conduct and supplier code of conduct relating to modern slavery are reviewed periodically for any changes and updates from time to time in compliance with applicable laws.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. As such, we are looking into initiatives to raise employee awareness on modern slavery.

4. RISK ASSESSMENT AND MANAGEMENT

Our 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. As part of this, we intend to consider any modern slavery risks that may be present anywhere in the global and domestic operations and supply chains of the reporting entity and subsidiaries. We expect that these steps will encourage responsible behaviour from our partners.

5. TRAINING AND AWARENESS

To create awareness and promote best practices, we have mandatory e-Learning training courses relating to code of conduct to bring about a common understanding across all employees including sub-contracted employees. Going forward, we intend to include modern slavery module in the code of conduct training to our employees.

We also intend to upload training on modern slavery onto our supplier portal to encourage and provide access to our suppliers to undergo this important training.

6. MEASURING EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

Whilst we have no formal key performance indicators in place to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains, we exercise oversight on supplier onboarding and carryout supplier performance evaluation. We use measures like periodic audits, labour monitoring and payroll systems for ensuring that slavery and human trafficking are not taking place in any part of our business or supply chains. As referenced above, any breaches of our policies or other areas of concern with regards to modern slavery can be reported directly through common email ID of Whistleblower as per the Whistleblower policy.

7. REMEDIES FOR BREACH

In the event of failure to comply with the above-mentioned policies, disciplinary action including termination of contract between the parties and/or further legal action may be initiated against the offending party. The action we take will be dependent on the circumstances of the breach.

8. CONSULTATION

We have taken the steps to consult with the subsidiary "Nielsen & Partner Pvt. Ltd.", Australia in relation to matters set out in this statement.

9. FURTHER STEPS

We are committed to comply with the highest standards of ethical, moral, professional, and legal conduct in our business operations. To maintain these standards, the Whistleblower policy provides a platform that encourages whistle-blowers, having complaints of actual or suspected incidents of unethical practices, violation of applicable laws and regulations including categories relating to supply chain, modern slavery, child labour and human trafficking, the Integrity Code, to promptly come forward and express the same without any fear of retaliation.

Declaration: This statement has been prepared by our company pursuant to section 13 of the Modern Slavery Act 2018, Australia in respect of the financial year 2021-2022. It sets the new and ongoing steps we are taking to address and prevent modern slavery taking place, both within our business and our supply chain. The Statement has been approved by the Board of Directors of our company on Jan 20, 2023.

Other Relevant Information: Mandatory criteria Page number/s of our statement that addresses each of the mandatory criteria in section 16 of the Modern Slavery Act 2018, Australia is summarised below:

MODERN SLAVERY ACT 2018, Australia (CTH) – STATEMENT ANNEXURE

S. No.	Mandatory criteria	Page Number/s
a)	Identify the reporting entity	2
b)	Describe the reporting entity's structure, operations and supply chain	2-3
c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	4-5
d)	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	4-5
e)	Describe how the reporting entity assesses the effectiveness of these actions	5
f)	Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement)	5
g)	Any other information that the reporting entity, or the entity giving the statement, considers relevant	6

Debashis Chatterjee
 CEO & Managing Director
 LTIMindtree Limited
 Date: 23-January-2023



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