

**TECH MAHINDRA LIMITED**

**MODERN SLAVERY POLICY**

**FY 2023-24**

Tech Mahindra Limited (hereinafter referred to as “We” or “Tech Mahindra”), along with its subsidiaries, associates and joint ventures (“collectively referred to as “group companies”) is publishing this Statement to disclose publicly the steps taken to tackle slavery, servitude, forced or compulsory labour and human trafficking.

We are committed to exhibiting zero tolerance towards all facets of modern slavery, as elaborated under the UK Modern Slavery Act 2015 (“**UK Act**”) and Australian *Modern Slavery Act 2018* (Cth) (“**Australian Act**”) guided by the UN Declaration of Human Rights and the conventions of the International Labour Organizations specified to forced or compulsory labour.

Tech Mahindra is a voluntary participant of the UN Global Compact.

Tech Mahindra provides this joint statement for itself and on behalf of its group companies directly covered by a disclosure obligation in their respective jurisdictions to elucidate the initiatives undertaken to eradicate the slavery and/or human trafficking from our supply chain or in any part of our organization.

Currently this includes Tech Mahindra Limited in UK pursuant to the UK regulations, and Tech Mahindra Limited, Australia pursuant to the Australian regulations. Tech Mahindra and its group companies, share the same core business operations and supply chains as well as modern slavery policies, processes, and risks further described in this statement.

### **Our Structure, Business and Supply Chains**

Tech Mahindra is an Indian public limited company, listed on the Stock Exchanges in India, and has its branches and group companies across 90+ countries with a workforce of around 145000+ employees.

Tech Mahindra is in the business of providing information technology services and solutions. Our consulting, enterprise and communications solutions, platforms and reusable assets connect across a range of technologies to deliver tangible business value to all our stakeholders.

We offer a bouquet of services which includes IT Outsourcing Services, ADMS, BPS, Cloud and Infra, Design, Engineering Services, Enterprise Applications, Network Services and Next Gen Services. Our business is primarily service based and very client centric. Tech Mahindra is not in the business of manufacturing products.

Tech Mahindra’s supply chain is global and is primarily made up of service suppliers, rather than products. Our suppliers and partners are engaged to specifically meet client requirements and are primarily global IT product suppliers.

Tech Mahindra obtains IT services and IT skilled resources from certain suppliers, and these suppliers work directly with Tech Mahindra and Tech Mahindra's clients for developing Software and IT solutions.

## Risks in the supply chain

We are committed to eradicating modern slavery, and we continuously assess and monitor our supply chain to identify and mitigate any potential risks. We actively collaborate with our suppliers to promote ethical labor practices, ensuring that they share our commitment to eradicating modern slavery from the supply chain.

Our thorough due diligence processes and ongoing supplier audits enable us to maintain a low risk of modern slavery across our Global operations.

## Modern Slavery Risk Approach, Assessment and Remediation

### **1. Policy and due diligence**

Tech Mahindra associates and suppliers are expected to meet the standards set by us in our Code of Ethical Business Conduct ("CEBC") and Diversity and Inclusion Policy ("D&I Policy"). These policies are overseen by the Board of Directors and are publicly available. Tech Mahindra's policy relating to Modern Slavery is captured in the Code of Ethical Business Conduct, which reflects our unwavering commitment towards effective implementation of human integrity and to achieve complete eradication of slavery and human trafficking.

We have an extensive training program for CEBC which covers various topics including modern-day slavery. It is mandatory for all associates of Tech Mahindra to undergo the CEBC training program on periodic basis.

To further increase awareness on modern slavery issues, we run additional campaigns throughout the organization to ensure that this information is readily available for all associates. Reporting Managers are responsible for ensuring that associates who report to them, directly or indirectly, comply with this Policy and complete certification and training required of them.

We have effective policies in place which ensure that no young person below the legal age will be hired by Tech Mahindra for any work to prevent any circumstances of child labor.

Associate performance is appraised in a transparent manner and all associates are given opportunities to grow in their respective careers. Tech Mahindra undertakes several associate benefit and welfare initiatives for example, health awareness and entertainment to ensure that associates work in conducive and exploitation-free environment. By implementing comprehensive associate policies and process, Tech Mahindra has ensured there is no scope for any instance of slavery, servitude or human trafficking.

### **2. Risk assessment**

Regular audits are conducted by Tech Mahindra's internal audit team to ensure the identification and removal of any instances of slavery. By having regular set audits Tech Mahindra aims to ensure it is always

improving its understanding of where the potential risks are within the business and prioritizing our activity to address and prevent any circumstances of modern slavery that may arise.

Tech Mahindra being a law-abiding organization, strictly adheres to and complies with all applicable laws, including without limit, employment related laws, laws related to working hours, wages, welfare and human rights. All policies are transparent and available for viewing on the intranet to all our associates. We continually update and amend our policies to align them with global best practices and any changes in relevant laws and regulations.

Tech Mahindra provides multiple channels to all associates to provide their feedback on any practice compromising our commitment towards eradicating modern slavery.

We assess risks related to Human Rights across the value chain. Employment contracts and policy documents go through periodic reviews to ensure that there are no human rights violations. This review is conducted across all our facilities globally. While reviewing such agreements and policies, significant effort and time is invested along with incidental costs needed for reviews. Such periodic reviews are proactive and designed to identify any risk of Human Rights violations or gaps in any of our own operations and in the supply chain across the globe.

### **3. Awareness and collaboration**

We have developed internal programs to raise awareness of issues such as slavery, forced or compulsory labor, exploitative practices by labor providers and human trafficking. This includes conducting campaigns throughout the year to ensure that the information is available to all the associates.

A responsive and sustainable supply chain is a priority for the organization. We operate in the core areas of quality, timeliness, sustainability and supplier risk management and business continuity management in our supply chain with capacity building, audits, training and awards. We engage with our suppliers and support them to develop their capabilities based on sustainable practices and business ethics. We have audited and assessed our key suppliers on ESG aspects till FY2023-24.

### **4. Building a strong supply chain**

We require our suppliers to ensure they work in alignment with applicable policies, laws and the Tech Mahindra values. We expect our suppliers to comply with all applicable regulations and legislation including without limit relating to working hours, wages, welfare, human rights. We make available to the suppliers, our policies such as Code of Ethical Business Conduct and D&I Policy, data privacy etc., which are implemented to lay foundation for strong corporate governance and ensure that our suppliers operate consistently with our company values. We insist, in our agreement, that our suppliers comply with all the applicable laws and instructions towards modern slavery and human trafficking. At the time of onboarding our suppliers are required to sign the Supplier Code of Ethical Business Conduct. The Suppliers Code of Ethical Business Conduct is available on our corporate website, [www.techmahindra.com](http://www.techmahindra.com).

All our suppliers are expected to work in accordance with our ethos and approach with regards to health, safety, environmental and people development objectives and as informed by Tech Mahindra from time to time We work to achieve this by supporting our suppliers through providing training, knowledge-sharing

campaigns and hold regular forums to communicate clear expectations as to the operational standards that are expected at Tech Mahindra.

## 5. Corporate governance framework

Tech Mahindra is dedicated to creating a fair and transparent work environment with mutual respect for all. We operate within an established and externally benchmarked corporate governance framework that is underpinned by our vision and values. A key function of our corporate governance framework is the identification, management and mitigation of risks within the current working environment of Tech Mahindra.

Our Corporate governance framework reflects our commitment to transparency, accountability and ethical conduct. The framework is aligned with global regulatory standards and has been designed to uphold the highest levels of integrity and to safeguard the interests of our stakeholders. It outlines the roles, responsibilities, and relationships between our Board of Directors, Leadership team and other stakeholders emphasizing the importance of informed decision-making, risk management, and compliance with legal and ethical standards.

The COREPORATE OMBUDSMAN leads an independent management function and is primarily responsible for investigation and redressal of concerns about Integrity and non-compliance with Tech Mahindra Code of Ethical Business Conduct.

An associate can raise a concern with the Corporate Ombudsman by:

- a. Sending an e-mail to [CorporateOmbudsman@techmahindra.com](mailto:CorporateOmbudsman@techmahindra.com); or
- b. In person complaints can also be reported verbally on telephone no. +91 120- 488- 4450. Verbal reports will normally be documented by the Corporate Ombudsman by a written transcription of the verbal report.

## 6. Remediation

We are committed to provide for or cooperate in the fair and equitable remediation process, if any violations are caused by Tech Mahindra, or through our relationships with third parties.

### Assessing the effectiveness of the approach

Tracking effectiveness is integrated into our relevant internal reporting processes. We may employ tools, review of performance contracts as well as surveys and audits, using gender-disaggregated data where relevant. Operational-level grievance mechanisms can also provide important feedback on the effectiveness of our organization's human rights program through our effective process.

Tech Mahindra conducts training to strengthen in-house awareness and education on the practice of human rights. Tech Mahindra believes that an empowered workforce is the best way to receive feedback and identify improvement areas. Tech Mahindra's Whistle-blower Policy is a critical means through which stakeholders can raise actual or suspected violations. The Corporate Ombudsman oversees investigative procedures laid

down and defined under the whistle blower policy. Tech Mahindra reviews issues reported and implemented corrective actions where required.

Tech Mahindra has a formal mechanism which takes place on a yearly basis by collecting the feedback in the following categories: career, alignment, recognition, empowerment and strive. Analysis of the data is done on a business unit level and a plan of action is implemented to improve the score and participation.

## Conclusion

Business must play its part to combat modern slavery. To do so effectively requires improved traceability, increased transparency and collaboration between statutory agencies, civil society organizations and the private sector.

Together, we can make an even bigger difference in upholding human rights!

This statement was approved by the Board of Tech Mahindra Limited on 18 October 2024, for and on behalf of the Tech Mahindra, and its group companies for the financial year ending March 31, 2024.

**Mohit Joshi**  
**CEO and Managing Director**