

# Modern Slavery Statement

U

FY: 2023-24

### **Table of Contents**

1.	LTIMindtree modern slavery statement	3
2.	Our organisation, operations, and supply chain	3
3.	Our business	4
4.	Reporting entity's structure, operations, and supply chain	4
5.	Due diligence, risk assessment and risk mitigation processes for modern slavery & human trafficking	5
6.	Training and awareness	7
7.	Measuring effectiveness in combating slavery and human trafficking	7
8.	Remedies for breach	7
9.	Consultations	7
10.	Further steps	8
11.	Declarations	8
12.	Statement annexure	9

# 01.

### LTIMindtree Modern Slavery Statement

This annual statement is published in accordance with Modern Slavery Act 2018, Australia and Modern Slavery Act 2015, United Kingdom (UK) for Financial Year 2023-24 and sets out the actions we have taken to assess and address modern slavery and human trafficking risks in our operations and supply chains.

This statement is made on behalf of LTIMindtree Limited, for its below entities –

Country	Name of the entity	Type of the entity	Registration number
	LTIMindtree Ltd	Branch	ABN 34 091 100 159
Australia	Nielsen& Partner Pty Ltd	Subsidiary	ACN 624 699 627
	LTIMindtree Ltd	Branch	FC020383
UK	LTIMindtree UK Ltd	Subsidiary	12817556
	Syncordis Ltd	Subsidiary	10045506

### 02.

### Our Organisation, Operations, And Supply Chain

#### 2.1 Company Overview and Operations

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 81,000+ talented and entrepreneurial professionals across more than 30 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. Our annual report for the FY 2023-24 can be accessed at

https://www.ltimindtree.com/wp-content/ uploads/2024/06/Integrated-Annual-Report-FY-2023-24.pdf?pdf=download

#### 2.2 Our Supply Chain

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



# 03.

### **Our Business**

As a socially and environmentally responsible business, we are focused on sustainable growth and building long-term stakeholder value. Our sustainability framework is based on environmental stewardship, diverse and inclusive talent pool, employee engagement, community care, robust policies, strict adherence to code of conduct, a strong risk management and compliance framework, highest governance standards, transparent and accountable reporting and disclosures. The Sustainability report of LTIMindtree for financial year 2023-24 can be accessed at our website

https://www.ltimindtree.com/socialresponsibility/

## 04.

### **Reporting Entity's Structure, Operations, And Supply Chain**

#### 4.1 Company Overview and Operations

LTIMindtree supports the elimination of all forms of forced and compulsory labour to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking. We are committed to addressing the modern slavery risks in our business and supply chain and ensuring that we have effective systems and practices in place to combat slavery and human trafficking. This statement highlights the key activities we have undertaken during this financial year to combat modern slavery in our organisation and supply chain.

#### 4.2 Complaint Mechanism



We have systems to encourage the reporting of

concerns and protection of whistleblower. All our employees including sub-contracted employees have access to 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. Our whistleblower policy can be accessed at

https://www.ltimindtree.com/wp-content/ uploads/2023/11/Whistleblower-Policy. pdf?pdf=download

#### 4.3 Periodic Review

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

# 05.

### Due Diligence, Risk Assessment And Risk Mitigation Processes For Modern Slavery & Human Trafficking

#### 5.1 Due Diligence Process

We undertake due-diligence procedures before onboarding new suppliers and all suppliers are contractually required to comply with applicable laws, regulations, and accept our supplier code of conduct.

#### 5.2 Risk Mitigation Process

Our procurement agreements and supplier purchase orders cover the modern slavery related risks. We have carried out annual risk assessment of global supply chain of our company, overseas branches, and subsidiaries to assess, identify and address modern slavery related risks.



#### 5.3 Risk Assessment

We have carried out risk assessment to assess the modern slavery risks that may be present anywhere in our global, domestic operations and supply chains. The assessment was carried out for the below mentioned areas -

- A. Sector & industry risk assessment
- B. Goods & services category risk assessment
- C. Geographic risk assessment

#### A. Sector & industry risk assessment

Risk assessment was carried out for identifying suppliers at risk for major sectors and risk rating are provided below

Low risk - information technology related (hardware, software, cloud services & network)

**Moderate risk** – admin & facilities related (security, infrastructure, health & safety)

**Low risk** - talent acquisition (manpower, background verifications service providers)

**Low risk** - corporate activities (accounting, consulting, training, immigration)

#### B. Goods & services category risk assessment

We have carried out risk assessment for the goods and services and identified where modern slavery risk is low in areas like hospitality and gardening services and moderate in a few areas like building infrastructure and maintenance, security services, waste management etc. The above risk arises from third party outsourcing.

#### C. Geographic risk assessment

Based on our modern slavery risk assessment, we have reviewed suppliers who are present in countries vulnerable to modern slavery and found it as low / moderate risk. We will continue to identify by way of ongoing periodic assessments, any modern slavery risks that may be present anywhere in our global and domestic operations and supply chains of our company branches and subsidiaries.

The overall risk assessment for all the above categories is low for FY 2023-24.



# 06.

### Training And Awareness

To create awareness and promote best practices, we have mandatory e-Learning training courses relating to code of conduct for all our employees including subcontracted employees. We have enabled access for modern slavery training for all our suppliers in the company's supplier portal to create awareness about modern slavery.

# 07.

### Measuring Effectiveness In Combating Slavery & Human Trafficking

#### 7.1 Supplier Engagement Program

This program integrates a continuing evaluation, capacity building and risk management with a focus on human rights, labour practices and regulatory compliance. Our supply chain is integrally linked to its successful growth, supported by supplier onboarding process which covers modern slavery risks. Our supplier code of conduct can be accessed at

https://www.ltimindtree.com/wp-content/ uploads/2022/12/LTIMindtree-Supplier-Code-Of-Conduct.pdf?pdf=download We expect that the above steps will ensure responsible behaviour from our suppliers.

# 7.2 Prevention of slavery and human trafficking

As per the key performance indicators of our whistleblower mechanism, we did not have any complaints relating to slavery and human trafficking across our company branches and subsidiaries during the FY 2023-24. We use oversight measures like audits and adverse media screening & due diligence tool for all active suppliers to ensure that slavery and human trafficking are not taking place in any part of our business or supply chains.

# 08.

### **Remedies For Breach**

In the event of failure of suppliers to comply with the above-mentioned policies, disciplinary action and/or further legal action may be initiated against the offending suppliers depending on the circumstances of the breach.

### 09. **Consultations**

We have taken the steps to consult with the subsidiary "Nielsen&Partner Pty Ltd", Australia in relation to matters set out in this statement. We have communicated this statement with the subsidiary, and they are subject to the same policies and procedures as set out in this statement.

# 10.

### **Further Steps**

**10.1** We are in the process of obtaining modern slavery declaration from our suppliers in Australia and UK for confirming their compliance with the Act.

**10.2** We will include modern slavery in the scope of supplier audit program for covering suppliers at risk.

**10.3** We will periodically review our modern slavery and human rights policies to align with regulatory requirements and internal policies.

# 11.

### Declarations

This statement has been prepared by our company pursuant to Section 13 of Modern Slavery Act 2018, Australia and Section 54(1) and Modern Slavery Act 2015, UK in respect of the financial year 2023-24. 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 July 17, 2024.

# 12. <sup>s</sup>

### **Statement Annexure**

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	3
b)	Describe the reporting entity's structure, operations, and supply chain	3-4
C)	Describe the risks of modern slavery practices in the operations and sup- ply chains of the reporting entity and any entities it owns or controls	5-6
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 ac- tions	7
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)	7
g)	Any other information that the reporting entity, or the entity giving the statement, considers relevant	8-9

**Debashis Chatterjee** CEO & Managing Director LTIMindtree Limited

Date: July 19, 2024