

MINDTREE'S MODERN SLAVERY STATEMENT

This annual statement is published on behalf of Mindtree Limited, a company incorporated under the laws of India, having its registered office situated at Global Village, West Campus, RVCE Post, Mysore Road, Bangalore, Karnataka, India- 560059 (Company) pursuant to Section 13 and section 16 of the Modern Slavery Act 2018, Australia and Section 54 of the Modern Slavery Act 2015, United Kingdom in respect of the Financial Year 2021-2022.

INTRODUCTION

Our values comprise of 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.

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 have zero tolerance to modern slavery and human trafficking, and we do not tolerate it either within our business or supply chain. We are consistently recognized among the best places to work. Larsen & Toubro Limited (L&T) is our holding company, majority shareholder and been in business for eight decades. Our Sustainability report and Business responsibility report for financial year 2021-22 can be accessed for more details at our website <https://www.mindtree.com/about/sustainability> and our annual report can be accessed at <https://www.mindtree.com/sites/default/files/2022-06/Annual-Report-FY-2021-22.pdf>

Our company operates as a branch of a foreign company in Australia with ABN 24 125 171 155 and in United Kingdom (UK) with branch number BR006016. A similar branch model in other key operational hubs, except China where we have a subsidiary, Mindtree Software (Shanghai) Co. Ltd, which is an 'entity' that the Company owns/controls, for the purposes of the Modern Slavery Act 2018.

b. Company Overview:

We are a technology and consulting services company. We are supported by over 83 years of engineering and technology leadership of our parent company, L&T, which has over 100,000 employees.

Our expertise is based on a 4x4x4 strategy aimed at ensuring that we engineer cutting-edge solutions to help our clients. The focus of this strategy is to ensure growth across all four service lines, industry groups

(Retail, Consumer Products and Manufacturing; Banking, Financial Services, and Insurance; Travel, Transport, Logistics & Hospitality; and Communication, Media & Technology) and geographies (North America; UK & Ireland; Continental Europe; APAC and Middle east). Our future-ready work ethos is driven by four values: Anchored by Purpose, Caring for People, Learning with Curiosity and Delivering Ambitious Results. Powered by more than 35,000 talented and entrepreneurial professionals across 24 countries, we are consistently recognized among the best places to work

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.mindtree.com/about/investors/policies>. 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 over 30 major 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 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 in place, systems to encourage the reporting of concerns and the protection of whistle-blowers and all employees have access to the 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., which helps us proactively identify such cases relating to coercion, threats, or deception. Our Whistleblower policy can be accessed at https://www.mindtree.com/sites/default/files/2022-04/Mindtree_Whistleblower_Policy.pdf

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

Adequate due-diligence procedures are implemented before onboarding new suppliers. Our suppliers are contractually required to comply with our policies, 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 annual risk assessment of our supply chain to assess, identify and address modern slavery related risks. We have a risk framework for tracking risk related to Modern Slavery with the automated adverse media due diligence system and vendor on-boarding process. We ask our suppliers in Australia and UK to give a declaration that they have complied with Modern Slavery Act.

We will continue to undertake controls like supplier awareness, oversight mechanism in our procurement and talent acquisition process for mitigating modern slavery risk. We will ensure 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 will circulate mailers to create 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. 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. We also offer training on modern slavery to our suppliers and employees who are responsible for supply chain management, specifically regarding how to identify and respond to modern slavery in supply chain in accordance with the applicable laws.

6. MEASURING EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

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. Breach / Incident can be reported through common email ID of Whistleblower as per the Whistleblower policy.

7. REMEDIES FOR BREACH

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

8. CONSULTATION

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

9. FURTHER STEPS

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no Modern slavery or human trafficking in operations and supply chains. 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 and section 54 of the Modern Slavery Act 2015, UK 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 July 13, 2022.

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

Sl. No.	Mandatory criteria	Page number/s
a)	Identify the reporting entity	1
b)	Describe the reporting entity's structure, operations, and supply chains	1-2
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	3
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	2-3
e)	Describe how the reporting entity assesses the effectiveness of these actions	3
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)	3
g)	Any other information that the reporting entity, or the entity giving the statement, considers relevant	4

DEBASHIS CHATTERJEE
CEO & MANAGING DIRECTOR
MINDTREE LIMITED
August 02, 2022