

## **MINDTREE'S MODERN SLAVERY STATEMENT**

This second 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 of Australia in respect of the **Financial Year 2020-2021**.

### **INTRODUCTION**

Mindtree values comprise of principles of honesty, integrity, fairness and transparency. Mindtree’s sustainability framework is based on diverse workforce, inclusive workspace, applicable regulations, employee engagement, robust policies, strict adherence to code of conduct, risk management framework, reporting and disclosure.

### **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 260 enterprise client engagements to break down silos, make sense of digital complexity and bring new initiatives to market faster. We enable Information Technology (IT) to move at the speed of business, leveraging emerging technologies and the efficiencies of continuous delivery to spur business innovation. Operating in 24 countries across the world, we are consistently regarded as one of the best places to work, embodied every day by our winning culture made up of over 23800 entrepreneurial, collaborative and dedicated “Mindtree Minds”.

Mindtree is committed to the highest standards of integrity and professionalism in everything we do. Mindtree has zero tolerance to Modern Slavery and Human Trafficking. Larsen & Toubro Limited (L&T) is Mindtree’s Holding Company and majority shareholder.

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, except 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.

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

Mindtree delivers digital transformation and technology services from ideation to execution, enabling global clients to outperform the competition. Mindtree provides Digital, Internet of Things (IOT), Enterprise Resource Planning (ERP), Engineering, Independent testing, Infrastructure management, Data warehouse, Analytics and related services to industry groups like Banking Financial Services and Insurance ( BFSI), Retail, Consumer Packed Goods ( CPG), Manufacturing, Communication Media & Technology (CMT), Travel Transportation & Hospitality (TTH). “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 IT into a strategic asset. Collaborative Spirit, Expert Thinking and Unrelenting Dedication are our values and our mission for FY 2020-2021 at Mindtree was “Technology Solutions to help businesses and societies flourish.” Mindtree’s revenue was around \$1 Billion+ with a headcount of 23800+ in FY 2020-2021, which also happens to be our 21<sup>st</sup> 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 Modern 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:

- Transparency, Accountability, Integrity and Independence;
- Act in the Spirit of Law and not just the Letter of Law;
- Do what is right and not what is convenient, and
- 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 vendor onboarding process which is validated before adding a new vendor in our vendor master. As the first step in this program, it is mandatory for all suppliers and vendors to accept our supplier 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 Modern 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 Human rights policy, Whistle Blower Policy, Supplier Code of Conduct, Integrity policy, Code of conduct policy, Non-discrimination policy Anti-Slavery, Anti-Human Trafficking, Anti-Bribery and Anti-Corruption, etc. Mindtree has zero tolerance on compliance matters and Suppliers are required to comply with all applicable laws and produce supporting evidence of statutory records during compliance audits.

Our suppliers are spread across the globe where Mindtree procures services from multiple categories of suppliers. 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 and employee travel related services.

Mindtree's Global suppliers are located in over 30 major countries and sub regions such as Asia pacific, Americas, Europe and Middle East.

## **2. MINDTREE POLICIES IN RELATION TO MODERN SLAVERY AND HUMAN TRAFFICKING**

Mindtree is committed to ensure that there is no Modern slavery or human trafficking in any part of our business including our supply chain. Mindtree has formulated various policies and practices which focuses 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. The internal committees to identify, 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](http://www.mindtree.com).

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 Request for information (RFI) & Request for proposal (RFP) etc.

Our policy proactively prevents workplace bullying. Our employees and sub-contractor employees are encouraged to promptly report the alleged bullying behaviors.

In order to create awareness and promote best practices, we have mandatory e-Learning

training courses relating to Integrity, Prevention of Sexual Harassment, etc. 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 not limited to use of Child Labor, Modern Slavery, Forced, bonded or indentured labor or involuntary prison labor, Human trafficking etc., which helps us to proactively identify such cases relating to coercion, threats or deception.

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

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 appropriate services agreement. Additionally, while onboarding new suppliers we obtain applicable registration and license confirmations. We periodically audit our suppliers to ensure they comply with applicable laws and regulations.

As per Mindtree's Suppliers Risk Framework, suppliers are assessed and tagged as Low/Medium/High risk.

As part of Mindtree's initiative to further enhance and 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 for certain geographies which will be extended to all geographies with additional functionalities by June 2022.
- c) Supplier surveys will be put in place, and supplier declarations obtained proactively to identify Modern slavery related concerns.
- d) Policies are in place to tackle any Modern slavery concerns which will be periodically reviewed and updated.
- e) We have included 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.
- f) If we identify suppliers with lower score on supplier risk rating, we initiate corrective measures.

- g) We have a risk framework for tracking risk related to Modern Slavery and link the same with the vendor on-boarding process.

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

- a) We will prepare a supplier awareness training on Modern Slavery Act, Australia and upload it in our supplier portal. Suppliers shall be assessed for compliance and appropriate training shall be provided to personnel engaging with suppliers.
- 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 Modern slavery, coercion, and/or debt bondage.
- c) We will create an oversight mechanism in our talent acquisition process to proactively ensure that we identify Modern slavery related concerns. 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 ensure our compliance framework, including our policies, procedures, training modules, employee code of conduct and supplier code of conduct relating to Modern Slavery Act 2018 are 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.
- e) We will design employee mailers to create awareness of the Modern Slavery Act 2018.
- f) We will also include the review of our Supply chain for Modern Slavery Act as a part of our scope for internal audit.
- g) We will 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.
- h) We will include Modern Slavery as a Key Performance Indicator for our employees dealing with Supply chain.

#### **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 team. Mindtree expects that these steps will encourage responsible behavior from our partners.

## **5. 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.

## **6. MEASURING EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

Mindtree uses the following Key Performance Indicators to measure how effective we have been on ensuring that slavery and human trafficking are not taking place in any part of our business or supply chains:

- a) Periodic in-house audits;
- 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.

## **7. REMEDIES FOR BREACH**

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

## **8. 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.

## **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 our supply chains. We will continue to improve our process 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, Modern slavery, child labour and human trafficking, 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 statement has been prepared for Mindtree Limited pursuant to section 13 of the Modern Slavery Act 2018 of Australia in respect of the financial year 2020-2021. 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 Mindtree Limited on September 28, 2021.

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

**MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE**

<b>S. No</b>	<b>Mandatory criteria</b>	<b>Page number/s</b>
a)	Identify the reporting entity	1
b)	Describe the reporting entity's structure, operations and supply chains.	1
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.	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
e)	Describe how the reporting entity assesses the effectiveness of these actions.	6
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).	6
g)	Any other information that the reporting entity, or the entity giving the statement, considers relevant.	7

**DEBASHIS CHATTERJEE**  
**CEO & MANAGING DIRECTOR**  
**MINDTREE LIMITED**  
**September 29, 2021.**