

MINDTREE'S ANTI SLAVERY AND ANTI HUMAN TRAFFICKING STATEMENT

This statement is published on behalf of Mindtree Limited ("Mindtree") pursuant to Section 54(1) of the Modern Slavery Act 2015 in respect of the **financial year ended 31 March 2020**.

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. Mindtree's governance philosophy requires each of us to act in the spirit of law and not just letter of law, do what is right and not what is convenient, provide complete transparency and follow openness in our communication with our stakeholders.

1. OUR ORGANISATION STRUCTURE AND SUPPLY CHAIN

(a) About Mindtree:

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 300+ enterprise client engagements to break down silos, make sense of digital complexity and bring new initiatives to market faster. We enable IT to move at the speed of business, leveraging emerging technologies and the efficiencies of Continuous Delivery to spur business innovation. Operating in 18 countries and over 40 offices across the world, we're consistently regarded as one of the best places to work, embodied every day by our winning culture made up of over 21,000 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 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.

(b) Supply Chain Overview

Mindtree is committed to the highest standards of integrity and professionalism and expects the same from its supply chain. Mindtree expects the highest standards of integrity and compliance with laws 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 automated ERP System with vendor masters. We have vendor onboarding process which is verified before adding in vendor master. As the first step in this program, it is mandatory for all suppliers and vendors to confirm the acceptance of code of conduct principles.

2. MINDTREE POLICIES IN RELATION TO 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 chains. Mindtree has formulated various policies and practices such as whistleblower policy, integrity policy, code of conduct policy, non-discrimination policy, which focus on slavery and human trafficking and is part of a larger effort of supply chain transparency and accountability and respect for human rights.

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.

3. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of Mindtree’s initiative to identify and mitigate risk –

- a) Mindtree does periodic audits to ensure optimum controls in the work environment;
- b) Mindtree has in place systems to encourage the reporting of concerns and the protection of whistleblowers.

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 labor practices and regulatory compliance through ongoing periodic assessments done by both external consultants and review by Internal Audit team. Mindtree’s expect that these steps will encourage responsible behavior from our partners.

5. ADHERENCE TO MINDTREE’S VALUES

Like any other critical topics like Anti-discrimination, Sexual Harassment or Conflict of Interest Mindtree has zero tolerance to slavery and human trafficking. Mindtree expects all of those associated with Mindtree including its employees, supply chain and contractors to adhere and strictly comply with Mindtree’s values. Mindtree expects its stakeholders including its internal departments such as human resources and central procurement teams for ensuring compliance across the organization.

6. 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.

7. OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

Mindtree uses the following key performance indicators (KPIs) 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 by internal audit team;
- b) Use of labor monitoring and payroll systems; and

- c) Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, Mindtree's expectations.

8. REMEDIES FOR BREACH

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

9. FURTHER STEPS

Following a review of the effectiveness of the steps, we have taken this year to ensure that there is no slavery or human trafficking in our supply chains. We will continue to improve our process, 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, 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 Policy statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement of Mindtree Limited for the **financial year ended 31 March 2020**.

DEBASHIS CHATTERJEE

CEO & MANAGING DIRECTOR

MINDTREE LIMITED

March 31, 2020